

Data Protection Policy

Version control

Date	Action	Next review
	New policy	
	Policy reviewed and approved by Board	

Overview

Cresconova Labs is committed to safeguarding personal data in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant guidance. This policy outlines how we handle personal data, including sensitive data such as biometrics, and our use of CCTV in classrooms.

Our goal is to ensure that personal data is processed lawfully, transparently, and securely while respecting the rights and privacy of individuals. This policy should be read alongside our Privacy Policy, as both contain important information about how we use, store and process your data.

Scope

This policy applies to:

- All personal data processed by Cresconova Labs, including data about students, parents, staff, and visitors.
- All staff, contractors, and third parties handling personal data on behalf of Cresconova Labs.

Personal data includes any information that identifies an individual, such as names, contact details, biometric data, and CCTV footage.

Policy Aims

1. **Ensure Compliance:** Adhere to UK GDPR and other legal requirements.
2. **Protect Privacy:** Safeguard the personal data of students, staff, and visitors.
3. **Promote Transparency:** Inform individuals about how their data is collected, stored, and used.

4. **Enable Security:** Implement measures to prevent unauthorized access, loss, or misuse of personal data.

Key Principles

1. Lawful, Fair, and Transparent Processing

- Data will only be collected and used for legitimate purposes related to the operation of Cresconova Labs, such as educational delivery, safety, and administration.

2. Data Minimization and Accuracy

- We will only collect data that is necessary and relevant for the intended purpose.
- Personal data will be kept accurate and up to date.

3. Secure Storage and Retention

- Data will be stored securely using physical and digital safeguards.
- Personal data will only be retained as long as necessary for its purpose, after which it will be securely deleted.

Privacy notice

This Notice sets out important information about how Cresconova Labs collect and use personal data.

What Personal Data do we collect?

Personal data means information which identifies you and relates to you as an individual. Cresconova Labs will collect, use and store personal data for a wide variety of purposes in connection with our relationship. We have set out below the main categories of personal data which we process on a day to day basis:

Categories of Personal Data

The types of personal data we process will include:

1. Names, addresses, telephone numbers, email addresses and other contact details;
2. Date of birth;
3. National insurance, government identification and/or driving license number;
4. Gender;
5. Emergency contact information, including next of kin details;
6. A copy of your passport, driving license or national ID document;
7. Academic records;
8. Child protection records (where applicable);
9. References given or received by Cresconova about pupils;
10. Images captured on the CCTV system;
11. Bank account details;
12. In the case of scholarship applications, information relating to your lifestyle and financial circumstances;

13. Personal characteristics such as your ethnic group, any special educational needs you may have and any relevant medical information;
14. Biometric data for registration, identification and safeguarding purposes; and
15. For employees: documents gathered from the recruitment process (including CV, application form, references, professional memberships and qualifications, background vetting information, general employment records including details of training, disciplinary and grievance matters, start date, location of employment, benefits, holiday and other absences, along with a copy of employment contracts, performance records and compensation history).

Biometric Data

Cresconova Labs may use biometric data for specific purposes, such as student identification or access control. To ensure compliance with UK GDPR:

- **Consent:** Biometric data will only be collected and processed with explicit, informed consent from the individual (or their parent/guardian for under-18s).
- **Purpose Limitation:** Biometric data will only be used for the specific purposes outlined in the consent agreement.
- **Storage and Security:** Biometric data will be encrypted and stored securely, accessible only to authorised personnel.
- **Withdrawal of Consent:** Individuals have the right to withdraw their consent at any time, and the data will be deleted.

CCTV in Classrooms

Cresconova Labs uses CCTV in classrooms to enhance safety, support teaching quality, and protect property.

- **Purpose:** CCTV is used for monitoring safety, safeguarding, and security. It is not used for constant monitoring of staff or students without cause.
- **Transparency:** Signs are displayed in areas under CCTV surveillance.
- **Access and Storage:**
 - CCTV footage is stored securely and only accessible by authorized personnel.
 - Footage is retained for a limited period (30 days) unless required for investigations.
- **Rights:** Individuals have the right to request access to footage involving them when an issue arises

How Do We Use Your Personal Data?

We will collect, create and hold personal information relating to our students and may also receive information about them from their previous school, local authority and/or the Department for Education (DfE). We also collect and hold personal information about our students' parents and carers. We use this personal data to:

- Provide education services to students and to monitor students' progress and educational needs;
- Safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care.
- Monitor the use of Cresconova's IT systems;
- Receive information about current and prospective students from any educational institution that they attend, including academic records, references and information relating to Fee Remission eligibility;
- For the purposes of student selection and to confirm the identity of prospective students and their parents;
- Make use of photographic images of students in our publications and on our website in accordance with our policy on taking, storing and using images of children;
- Raise invoices and process payments;
- For security purposes, and for regulatory and legal purposes (for example, child protection and health and safety) and to comply with our legal obligations;
- Provide updates on the activities of Cresconova including by sending notices and newsletters to parents by email and post;
- Where otherwise reasonably necessary for Cresconova's purposes, including to obtain appropriate professional advice and insurance; and
- As set out in our Privacy Policy.

We will use employees' personal data for a variety of purposes in order to perform our obligations under our employment contract(s), to comply with our legal obligations or otherwise in pursuit of legitimate business interests. We have set out below the main purposes for which employee personal data is processed:

- The payment of compensation and the administration of benefits (including pensions and insurances) under the employment contract.
- The day to day management of tasks and responsibilities.
- To manage performance, including the conduct of appraisals.
- To consider eligibility for promotion, change of compensation, bonus payments or for alternative roles within Cresconova.
- To comply with legal requirements, such as reporting to the local tax authority, ensuring eligibility to work in the UK, health and safety compliance.
- To address disciplinary and grievance issues with individual employees.
- To protect our confidential and proprietary information, and intellectual property.
- To protect our network security and prevent unauthorised access to our computer and electronic communication systems and preventing malicious software distribution.
- To monitor the property use of our IT systems.
- To prevent fraud against Cresconova and our customers.
- If a business transfer or change of ownership occurs or is planned.

The above lists are not exhaustive, and we may undertake additional processing of personal data in line with the purposes set out above. We will update this Notice from time to time to reflect any notable changes in the purposes for which we process your personal data.

Legal basis for processing of data

The legal basis for processing the personal data listed above are:

- To enable us to provide educational services;
- To comply with our legal obligations;
- For safeguarding purposes;
- Where the processing is necessary for the purposes of the child's legitimate interests.

Information relating to racial or ethnic origin, religious beliefs or health and biometric data will only be processed with the explicit consent of the student or student's parents.

When Do We Share Personal Data?

We may share student or guardian's personal data with the following recipients and in the following circumstances:

- We will provide references and information regarding outstanding fees and payment history to any other educational institution that the child proposes to attend.
- To third party agencies, where required for safeguarding purposes.
- In the event of a merger or sale of the business.
- To fulfil the purposes for which you have provided personal information.
- To other recipients, as set out in our Privacy Policy.
- Where required by law.

Cresconova Labs will share employee personal data with other parties only in limited circumstances and where this is necessary for the performance of the employment contract or to comply with a legal obligation, or otherwise in pursuit of its legitimate business interests, including as follows:

- Payroll providers.
- Providers of benefits such as pensions and insurances.
- Occupational health providers and other medical practitioners.
- HMRC and/or any other applicable government body.
- Accountants, lawyers and other professional advisors.
- IT service providers.
- Prospective employers when providing a reference.

(ii) In all cases, the personal data is shared under the terms of a written agreement between the Company and the third party which includes appropriate security measures to protect the personal data in line with this Notice and our obligations. The third parties are permitted to use the personal data only for the purposes which we have identified, and not for their own purposes, and they are not permitted to further share the data without our express permission.

(iii) As a global employer, the Company will also share employee personal information with other group companies and third parties located outside of the EEA from time to time.

Individual Rights

Under the UK GDPR, individuals have the following rights regarding their personal data:

1. **Access:** Request access to the data held about them.
2. **Rectification:** Request corrections to inaccurate data.
3. **Erasure:** Request deletion of their data, subject to legal or operational requirements.
4. **Objection:** Object to the processing of their data.
5. **Restriction:** Request limits on how their data is processed.

Requests can be submitted to Chief Creative Officer: Christine Braun at Christine.braun@cresconova.org

Data Retention Periods

Please refer to our Data Retention Policy for data retention periods.

Data Security

Cresconova has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process.

Data Breach Management

In the event of a data breach:

- **Investigation:** The breach will be assessed and reported to the Data Protection Officer (DPO).
- **Notification:** If necessary, affected individuals and the Information Commissioner's Office (ICO) will be informed within 72 hours.
- **Mitigation:** Steps will be taken to contain and address the breach.

Roles and Responsibilities

- **Data Protection Officer (DPO):** Responsible for ensuring compliance with data protection regulations and this policy. The Data Protection Officer is Harriet Deakin (legal@cresconovalabs.org).
- **All Staff:** Must handle personal data in accordance with this policy and report any breaches or concerns to the DPO.

Policy Review

This policy will be reviewed annually or when there are significant changes to data protection laws or Cresconova Labs' operations.

Contact Information

For questions, concerns, or to exercise your data rights, contact:
Chief Creative Officer: Christine Braun (Christine.braun@cresconova.org)