





ACE Schools Multi Academy Trust

# Data Protection Officer Statement

Issue	Date	Author/Reviewer Job Role	Comments	Signed by DPO
1	May 2018	<i>Sapphire Consulting</i>	New policy in line with GDPR	
2	Feb 2019	Chris Humphries Director for Performance	Updated and MAT formatted	

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# 1 Policy Detail

## 1.1 General.

- 1.1.1 The GDPR states that the controller and the processor shall designate a data protection officer in any case where:
  - 1.1.1.1 The processing is carried out by a public authority or body, except for courts acting in their judicial capacity;
  - 1.1.1.2 The core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale; or
  - 1.1.1.3 The core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to Article 9 and personal data relating to criminal convictions and offences referred to in Article 10.

## 1.2 Assessment.

- 1.1.2 ACE Schools MAT does need a data protection officer because we do meet one or more of the criteria detailed above.
- 1.1.3 Specifically, we meet criteria: 1.1.1.1
- 1.1.4 ACE Schools MAT will meet its DPO obligation by engaging a named DPO from an outsourced DPO service provided by Sapphire Consulting Group Ltd.