



Making a difference for every child

SP30: Data Protection Policy

Owning Committee: Resources
Owning Governor: Elaine Heywood
Owning School rep: Julie Robinson
Date of Approval: May 2018
Date of next review: May 2019

AIM OF DOCUMENT: This document outlines how the school adheres to data protection legislation.

IN EVENT OF CONCERN/QUESTIONS: Contact the owning governor, contact details available through the school administrator.

HOW DOES THIS DOCUMENT HELP THE CHILDREN? Information is managed so that the needs of children can be met and that privacy and data of all parents and staff is maintained correctly and in line with GDPR regulations.

MONITORING PLAN FOR POLICY: Annual monitoring by the Headteacher and policy owning governor, involving review of registration, complaints, any data breaches and data requests.

Revision History:

Version	Update details	<i>Date of approval</i>
V1		<i>May 2012</i>
V2	Approved by Resources	28 Nov 2013
V3	Approved by Resources	22 Jan 2015
V4	Elaine Heywood updates, privacy policies updated	March 2017
V5	Updated in line with GDPR regs ready for 25.5.18	May 2018



The school collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller, of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer (DPO), who may be contacted at: SHEET PRIMARY SCHOOL, SCHOOL LANE, SHEET, GU32 2AS

Julie Robinson – Headteacher and Data Protection Officer

The school issues Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data.

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the GDPR, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

What is Personal Information/ data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, and an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

1. Personal data shall be processed lawfully, fairly and in a transparent manner
2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes)



3. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive
4. Personal data shall be accurate and where necessary, kept up to date
5. Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
6. Personal data shall be processed in a manner that ensures appropriate security of the personal

Duties

Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

Data Controllers have a General Duty of accountability for personal data.

Commitment

The school is committed to maintaining the principles and duties in the GDPR at all times. Therefore the school will:

- Inform individuals of the identity and contact details of the data controller
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this.
- If the school plans to transfer personal data outside the EEA the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information
- Inform individuals of their data subject rights (including but not limited to their rights to make a subject access request)
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept
- Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected the school shall inform the individual and where necessary seek consent
- Check the accuracy of the information it holds and review it at regular intervals.



- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests)
- Ensure that personal information is not transferred outside the EEA without the appropriate safeguards
- Ensure that all staff and governors are aware of and understand these policies and procedures.

CCTV

A CCTV system is installed at the school premises. The external CCTV camera is clearly labelled or otherwise notified to staff and visitors and is visible. It is positioned on the exterior of the building outside the front entrance of the school. Images are recorded and retained for the period of time set our document retention schedule. They are primarily to assist with security and safety of our pupils, staff and visitors to the school [although in rare cases we may use CCTV footage in investigations.]

DPIAs

It a legal requirement under GDPR to carry out a Data Protection Impact Assessment (DPIA) where the use of the personal information is likely to result in a high risk to the privacy of individuals. When the school introduces new services or technologies, the school will carry out a DPIA.

Data Breaches

The school has a data breach reporting process. All data breaches must be reported to the DPO immediately and recorded on the data breach reporting form. The DPO will consider whether breaches need reporting to the ICO or data subject. All data breaches will be reported to the Governors.

Reporting

The DPO will report to the Governors regularly in relation to data protection matters generally, including the need for any DPIAs, complaints, data breaches and subject access requests. In relation to urgent matters in circumstances where the DPO is the Headteacher, the DPO will report to two



nominated Governors from the Chair of the Full Governing Body, the Chair of the Curriculum Committee and the Chair of the resources Committee.

Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.org.uk.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every two years. The policy review will be undertaken by the Data Protection Officer, Head teacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact

Gill Burford or Julie Robinson 01730 263310

[May 2018]