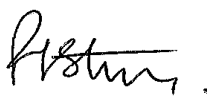


Barncroft Primary School



Data Protection Policy

Document Information			
Policy Number:	POL-R-003	Created by:	Resources
Reviewed by:	Resources	Responsibility:	Resources
Last Review:	March 2020	Next Review:	March 2022
Review Cycle:	Biennial	Ratified by FGB:	March 2020
 Signature (Resources Lead Governor):			

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, who may be contacted via the school office on 02392 482331.

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, 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 data

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 (Currently the Headteacher)
- Inform individuals of the contact details of the Data Protection Officer (Currently the Inclusion Manager)
- Via the Schools Privacy Notice the school will Inform individuals of
 - The purposes that personal information is being collected and the basis for this
 - Inform individuals of their data subject rights
 - Provide details of the length of time an individual's data will be kept
- 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 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.
- 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.
 - *Paper records are kept securely for example in a locked cabinet in an office with the keys securely stored*
 - *Electronic data is stored securely on the schools IT system which is password protected and time configured to lock screens when staff are not present,*
 - *Staff are required to use the schools secure e-mail system when sending personal data or when sending Special Category Data*
 - *Staff have had training on and receive regular updates on good practices in relation to protection of data from loss or theft outside of school, e.g. use of encrypted USB devices.*
 - *Staff are required to sign for return of any devices (FOBS/Computers/USB devices) and/or information (paper or electronic) pertaining to school upon termination of employment*
 - *Personal and special category information will be transferred securely via courier or hand delivered when required.*
- 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.
 - *Paper records will be shredded*
 - *Electronic records will be permanently deleted*
- 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.
 - *All procedures around data protection and handling personal data appropriately will be disseminated to staff annually via the staff handbook.*
 - *Any breaches in data will be recored accordingly and school will undertake a full investigation and any lessons learned will be communicated to all staff and governors.*
 - *Any changes or updates will be communicated to all staff via the schools internal communication system and via regular staff briefings.*
 - *Data protection policy and training relating to handling personal information appropriately will be shared with all new members of staff, students or volunteers via the schools induction process.*
 - *All members of staff managing and handling personal information understands that they are contractually responsible for following good data protection practice.*

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.gov.uk

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 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 Mrs Sally Blackhall, who will also act as the contact point for any queries