

FEDERATION OF AWBRIDGE AND WELLOW SCHOOLS

Data Protection Policy

Introduction

The Data Protection Act 1998 is designed to protect the privacy of individuals and to ensure that personal data is processed fairly and lawfully.

It protects personal data by setting terms and conditions that all staff must follow when processing details about any living individual. You can read about these in section 7 of the Act. The Federation of Awbridge and Wellow Schools collects and uses personal information (referred to in the General Data Protection Regulations (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 at the School Office on 01794 340407 (Awbridge) or 01794 322021 (Wellow).

The school issues Privacy Notices (also known as a Fair Processing Notice) 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 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. Personal data is anything that identifies a living person and includes:

- a name and address, telephone number
- financial information
- a national insurance number
- a birth certificate
- a passport
- a driving licence

- a personal email address
- CCTV images
- sensitive details, such as religion, health records, or ethnic origin

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 person/individual.

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 Federation of Awbridge and Wellow Schools is committed to maintaining the principles and duties in the GDPR at all times. Therefore the school will:

- Inform parents of the identity and contact details of the data controller
- Inform parents of the contract details of the Data Protection Officer
- Inform parents of the purposes that personal information is being collected and the basis for this
- Inform parents when theirs or their child's 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 parents and provide them with details of where they can obtain details of the safeguards for that information.
- Inform parents of their data subject rights.
- Inform parents that they may withdraw consent (where relevant) and that if consent is withdrawn 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 a personal data for a different reason to that for which it was originally collected the school shall inform the parents 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 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.

Processing different types of personal data

All staff are required to comply with this Policy when processing personal data as part of their role at work.

Processing includes things such as:

- recording and updating personal details
- recording information from telephone calls
- reviewing the file (paper or electronic)
- reading the file or documents
- storing/archiving the file or documents for future use
- discussing any action that needs to be taken
- creating/receiving e-mails or other correspondence

Using a form to collect personal data

Collecting personal details using a form (manual or electronic): The School issues a Privacy Notice which is issued to parents and staff which clearly sets out the purpose data will be used for, who it may be shared with, and if the data is to be stored electronically this must be explained.

Collecting personal data over the telephone

When the school records names and addresses over the phone in order to answer a query or provide details of our services the school will ensure the person understands why their details are being recorded, and that it may be necessary to pass contact information to another department. This will enable the parents to make an informed decision as to whether or not to provide their personal details.

School Responsibilities - Stored Data

The Federation of Awbridge and Wellow Schools follows Hampshire County Council's Schools Record Retention Policy providing timescales for different types of records. The school has a Data Mapping Document, giving details of information held and the purposes for which it is held. All data is held securely – paper records are kept securely locked away, and electronic data is held on password-protected computer systems.

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 Commissioners who can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or at www.ico.gov.uk.

This Policy will be reviewed as it is deemed appropriate, but no less frequently than every three years. The Policy review will be undertaken by the Data Protection Officer, Executive Headteacher and Business Manager.

Contacts

If you have any queries in relation to this Policy, please contact Mrs Linda Bate, Data Protection Officer, who will also act as the contact point for any Data Protection queries.