



Data Protection Policy

Date of Policy Issue:	June 2018
Review Date:	June 2020
Name of Responsible Manager/Headteacher:	Lynn Paul
Signature of Responsible Manager/Headteacher	
Signature of Chair of Governors	
Date:	

Issue number	2.0
Changes:	<ul style="list-style-type: none"> • New version to reflect GDPR implementation

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 as follows:

Email: dataservices@judicium.com

Telephone: 0203 326 9174

The school issues Privacy Notices (also known as 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 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
The data controller is Kings Worthy Primary School.
- Inform individuals of the contact details of the Data Protection Officer
Data Protection Officer: Craig Stilwell
Address: 72 Cannon Street, London, EC4N 6AE
Website: www.judiciumeducation.co.uk
Email: dataservices@judicium.com
Telephone: 0203 326 9174
- Inform individuals of the purposes that personal information is being collected and the basis for this
We will issue privacy notices to all new parents & staff. Privacy Notices will be re-issued to all parents and staff following any changes
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this.
This will be done via our Privacy Notices.
- 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.
This will be done via our school website.
- Inform individuals of their data subject rights
The rights to be informed, of access, to rectification, to erasure, to restrict processing, to data portability, to object to processing, related to automated decision making.
- 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.
Parents should contact the school office in writing to withdraw consent.
- Provide details of the length of time an individual's data will be kept

Kings Worthy Primary School retain data according to the HCC School Records Retention Schedule v3.0, unless overridden by Statute

- 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.

This will be done in writing.

- Check the accuracy of the information it holds and review it at regular intervals.

Data sheets will be sent home annually so that parents can check and amend/update information as necessary. Parents are asked to inform the school, without delay, during the school year if any information changes.

- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.

All computers require the user to sign in with a secure password. All packages that hold personal data including SIMS, IBC, Target Tracker, Tucasi and Cool Milk have restricted access, as has the Office drive on the school's network. All paper files are kept in the school or headteacher's offices in locked cabinets.

- 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.

All paper records are shredded or sent for secure destruction. All electronic data records are securely wiped before disposal.

- 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.

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 two years. The policy review will be undertaken by the Data Protection Officer, Headteacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact the Data Protection Officer who will also act as the contact point for any Subject Access Requests.