

DATA PROTECTION POLICY

Name of Responsible Manager / Headteacher:	Mr. John DF Martin
Policy Owner:	Mrs. Louise Riordan
Date of Policy Approval by Governing Body:	June 2018
Date of last Policy Review:	December 2022
Date of next Policy Review:	December 2024

The school collects and uses personal information (referred to in the UK 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 at admin@chjs.net or Tel: 01256 473777

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 UK 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. Lawfulness, fairness and transparency. Personal data shall be processed lawfully, fairly and in a transparent manner. In order for personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the UK GDPR. These include (amongst other relevant conditions) where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the school.

Where the special categories of personal data are processed, this shall include (amongst other relevant conditions) where processing is necessary for reasons of substantial public interest.

When processing personal data and special category data in the course of school business, the school will ensure that these requirements are met where relevant.

2. Purpose limitation. 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). The school will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.

3. Data minimisation. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.

4. Accuracy. Personal data shall be accurate and where necessary, kept up to date; Personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the school of any changes in circumstances to enable records to be updated accordingly. The school will be responsible for ensuring that updating or records takes place where appropriate.

5. Storage limitation. 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. The school will not keep personal data for longer than is necessary for the purpose or purposes for which they were collected and will take reasonable steps to destroy or erase from its systems all data which is no longer required.

6. Integrity and confidentiality. Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Duties

Personal data shall not be transferred to a country or territory outside the UK and the European Union (EU)/European Economic Area (EEA), 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 Castle Hill Primary School.*
- Inform individuals of the contact details of the Data Protection Officer
 - *Data Protection Officer: Louise Riordan (School Business Manager)*
 - *Email: admin@chjs.net; Tel: 01256 473777*
- Inform individuals when their information is shared, and why and with whom unless the UK 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 UK and the EU/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.
 - *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 (admin@chjs.net) in writing to withdraw consent.*
- Provide details of the length of time an individual's data will be kept
 - *Castle Hill 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.
 - *Contact parents annually so that parents can check and amend/update information as necessary. Parents are also asked to inform the school, without delay, during the school year if any information changes and can do this via the school website.*

- 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 Pupil Asset, 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 UK and the EU/EEA without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Retention and Disposal of Personal Data

The school will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as appropriate.

The school maintains a Retention Schedule that is specific and relevant to the specific types of information retained. The schedule outlines the appropriate periods for retention in each case.

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, Head teacher, 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 queries.