

# Data Protection Policy

From Staff Policies

## Contents

- 1 Relevant legislation
- 2 Purpose
- 3 Principles
- 4 Detail
- 5 Roles and Responsibilities
- 6 Monitoring and Evaluation
- 7 Related Documents and Locations
- 8 Related Policies

## Relevant legislation

Data Protection Act (DPA) (2018) (<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted/data.htm>)

Freedom of Information Act (FOIA) (2000) (<http://www.legislation.gov.uk/ukpga/2000/36/contents>)

General Data Protection Regulation (GDPR) (2016) (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>)

## Purpose

To ensure that :

- all aspects of data use at Priory School conform to the relevant legislation
- there is no detriment to data subjects and the integrity and security of data is preserved
- data is used effectively and for the described purpose

## Principles

The school believes in the welfare of data subjects and the handling of data with caution, confidentiality and sensitivity. It will therefore comply fully with the DPA's "Data Protection Principles", which state that personal information must be :

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than is necessary
- Processed in accordance with an individual's rights
- Kept secure
- Not transferred without adequate protection

All data at the school is categorised according to a RAG system :

- **Harmless** - e.g. a lesson plan (no DP action required)
- **School** - e.g. a marksheet (caution : inclusion of data such as FSM details may move this into the next category)
- **Personal** - e.g. a student home address (data which could be used to identify an individual)

## Detail

The following is a list of current **procedures** relating to data protection. As new technologies come into use, best practice may change rapidly and therefore these operational documents may be updated as circumstances require, within the principles of this policy but without the need for further consultation.

### Policy Details

#### Legal Status

Statutory

#### Adopted

February 2018

#### Version Date

February 2018

#### Last Review

February 2019

#### Next Review

February 2020

#### Responsible SMT

NH

- Cloud Data Protocol
- Data in Transit Procedure
- Data Protection Guidance
- Data Protection Incidents Procedure
- Data Retention Schedule for Schools (ESCC)
- Email Guidelines
- Email Protocol
- FOI Publication Scheme
- Guidelines for Staff Transferring Data
- Information Storage, Retention and Disposal Procedure
- Keeping Personal Information Safe During Off-Site Visits (ESCC)
- Markbook Protocol
- Responding to Requests for Information Procedure
- Telephone Security Protocol
- Use of Images of Children Procedure

## Roles and Responsibilities

The **Governing Body** is responsible for reviewing the policy annually

### The **Headteacher**

- has shared responsibility with the Data Protection Officer for data protection and integrity

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- has shared responsibility with the Headteacher for data protection and integrity
- has responsibility for notifying the Information Commissioner's Office under the DPA

### The **Data Manager**

- will determine access rights to the different SIMS modules and ensure their effective operation

**Staff** and other authorised users (e.g. PGCE students, Governors, EWO)

- must follow the procedures detailed above

### **Parents and carers**

- must provide the school with up-to-date information as appropriate and when requested
- must ensure that the data they supply to the school is accurate

Failure to follow the procedures referred to above may lead to sanctions, disciplinary action or the involvement of the police or local authority.

## Monitoring and Evaluation

This policy will be updated as necessary to reflect best practice and to ensure compliance with any changes or amendments made to the relevant legislation. The Governing Body will monitor the effectiveness of the policy through its Strategic Organisation Committee, and review it as part of their cycle of Policy Review.

## Related Documents and Locations

Data Protection Incident Report Form  
 ESCC Information Security Breach Management Plan for Schools  
 FOI Detailed Definitions for Publication Scheme  
 Information Destruction Log - electronic (Data Protection Officer)  
 Information Destruction Log - paper (Office Manager)  
 Personal Data Release Form  
 Privacy Notice

### Related Procedures

- Cloud Data Protocol
- Data in Transit

Privacy Notice - Staff  
Privacy Policy - Alumni  
Year 11 Privacy Notice

## Related Policies

- CCTV Policy
  - Child Protection Policy
  - Network Security Policy
  - Online Safety Policy
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- Procedure
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