



## Data Protection Policy

<b>Policy Number:</b>	SP9	<b>Created by:</b>	HCC Model Policy
<b>Reviewed by:</b>	Data Protection Officer	<b>Responsibility:</b>	Resources Committee
<b>Last Review:</b>	Summer 2020	<b>Next Review:</b>	Summer 2022
<b>Review Cycle:</b>	Two Years	<b>Ratified by GB:</b>	20/05/2020

Purbrook Junior 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.

Purbrook Junior School is the Data Controller, of the personal data that it collects and receives for these purposes.

Purbrook Junior School's Data Protection Officer is Mrs Helen Saunders, School Business Manager, who can be contacted via the school office.

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 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. 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 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 any special category data in the course of school business, the school will ensure that these requirements are met where relevant.
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). 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. 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. 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 of records takes place where appropriate.
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. 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. Personal data shall be processed in a manner that ensures appropriate security of the personal data, including 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 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

Purbrook Junior 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

- 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.

## **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](http://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, Headteacher or nominated representative.

## **Contacts**

If you have any queries in relation to this policy, please contact Mrs H Saunders, Data Protection Officer for Purbrook Junior School.