

North Baddesley Infant School

Data Protection Policy

This policy was agreed and formally adopted May 2018

This policy will be reviewed annually.

Last review: Feb 2022



Any reference to “parents” throughout the policy refers to parents, carers or anyone else with primary care responsibility for a child.

This policy applies to the school governing body, all teaching and other staff, whether employed by the County Council or employed directly by the school, external contractors providing services on behalf of the school or the County Council, teacher trainees and other trainees, volunteers and other individuals who work for or provide services on behalf of the school. These individuals are collectively referred to in this policy as staff or staff members.

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.

Bryony Page is the school Data Protection Officer and may be contacted at North Baddesley Infant School on adminoffice@northbaddesley-inf.hants.sch.uk or 02380412412.

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 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. 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 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
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this
- Provide details of the length of time an individual's data will be kept
- Inform individuals of their data subject rights
- Check the accuracy of the information it holds and review it at regular intervals.
- 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
- 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
- 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 that 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)

- 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
- 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.

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

NBIS follows Hampshire County Council's Schools Record Retention Policy providing timescales for different types of records. All data is held securely – paper records are kept securely locked away, and electronic data is held on password-protected computer systems.

CCTV

The school uses CCTV for security purposes to help protect against vandalism and forced entry. CCTV is not used for the purposes of surveillance or monitoring pupils during the school day, though their images may be captured by the CCTV system present. CCTV images are stored on a password-protected computer system and held on site. CCTV images are retained for a period of two weeks before being erased.

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 annually. 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 Bryony Page via the school office, who will also act as the contact point for any data protection issues or concerns.