Featherstone Wood Primary School

GDPR Policy (data protection)

Reviewed: Summer 2020
Review Date: Summer 2022

Headteacher……Date……

Chair of Governors……Date……

1. Policy statement and objectives

1.1 The objectives of this Data Protection Policy are to ensure that Featherstone Wood Primary School and its governors and employees are informed about, and comply with, their obligations under the General Data Protection Regulation ("the GDPR") and other data protection legislation.

1.2 The School is a Community school and is the Data Controller for all the Personal Data processed by the School.

1.3 Everyone has rights with regard to how their personal information is handled. During the course of our activities we will Process personal information about a number of different groups of people and we recognise that we need to treat it in an appropriate and lawful manner.

1.4 The type of information that we may be required to handle include details of job applicants, current, past and prospective employees, pupils, parents / carers and other members of pupils' families, governors, suppliers and other individuals that we communicate with. The information, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the GDPR and other legislation. The GDPR imposes restrictions on how we may use that information.

1.5 This policy does not form part of any employee's contract of employment and it may be amended at any time. Any breach of this policy by members of staff will be taken seriously and may result in disciplinary action and serious breaches may result in dismissal. Breach of the GDPR may expose the School to enforcement action by the Information Commissioner's Office (ICO), including the risk of fines. Furthermore, certain breaches of the Act can give rise to personal criminal liability for the School's employees. At the very least, a breach of the GDPR could damage our reputation and have serious consequences for the School and for our stakeholders.

2. Status of the policy

1.1 This policy has been approved by the Governing Body of the School. It sets out our rules on data protection and the legal conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information.

3. Data Protection Officer[1]

3.1 The Data Protection Officer (the "DPO") is responsible for ensuring the School is compliant with the GDPR and with this policy. This post is held by John Simpkin, School Governor, j.simpkin@featherstonewood.herts.sch.uk.. Any questions or concerns about the operation of this policy should be referred in the first instance to the DPO.

3.2 The DPO will play a major role in embedding essential aspects of the GDPR into the School's culture, from ensuring the data protection principles are respected to preserving data subject rights, recording data processing activities and ensuring the security of processing.

3.3 The DPO should be involved, in a timely manner, in all issues relating to the protection of personal data. To do this, the GDPR requires that DPOs are provided with the necessary support and resources to enable the DPO to effectively carry out their tasks. Factors that should be considered include the following:

3.3.1 senior management support;

3.3.2 time for DPOs to fulfil their duties;

3.3.3 adequate financial resources, infrastructure (premises, facilities and equipment) and staff where appropriate;

3.3.4 official communication of the designation of the DPO to make known existence and function within the organisation;

3.3.5 access to other services, such as HR, IT and security, who should provide support to the DPO;

3.3.6 continuous training so that DPOs can stay up to date with regard to data protection developments;

3.3.7 where a DPO team is deemed necessary, a clear infrastructure detailing roles and responsibilities of each team member;

3.3.8 whether the School should give the DPO access to external legal advice to advise the DPO on their responsibilities under this Data Protection Policy.

3.4 The DPO is responsible for ensuring that the School's Processing operations adequately safeguard Personal Data, in line with legal requirements. This means that the governance structure within the School must ensure the independence of the DPO.

3.5 The School will ensure that the DPO does not receive instructions in respect of the carrying out of their tasks, which means that the DPO must not be instructed how to deal with a matter, such as how to investigate a complaint or what result should be achieved. Further, the DPO should report directly to the highest management level, i.e. the Governing Body.

3.6 The requirement that the DPO reports directly to the Governing Body ensures that the School's governors are made aware of the pertinent data protection issues. In the event that the School decides to take a certain course of action despite the DPO's advice to the contrary, the DPO should be given the opportunity to make their dissenting opinion clear to the Governing Body and to any other decision makers.

3.7 A DPO appointed internally by the School is permitted to undertake other tasks and duties for the organisation, but these must not result in a conflict of interests with his or her role as DPO. It follows that any conflict of interests between the individual's role as DPO and other roles the individual may have within the organisation impinge on the DPO's ability to remain independent.

3.8 In order to avoid conflicts the DPO cannot hold another position within the organisation that involves determining the purposes and means of processing personal data. Senior management positions such as chief executive, chief financial officer, head of marketing, head of IT or head of human resources positions are likely to cause conflicts. Some other positions may involve determining the purposes and means of processing, which will rule them out as feasible roles for DPOs.

3.9 In the light of this and in the event that the School decides to appoint an internal DPO, the School will take the following action in order to avoid conflicts of interests:

3.9.1 identify the positions incompatible with the function of DPO;

3.9.2 draw up internal rules to this effect in order to avoid conflicts of interests which may include, for example, allocating some of the DPO's other duties to other members of staff, appointing a deputy DPO and / or obtaining advice from an external advisor if appropriate;

3.9.3 include a more general explanation of conflicts of interests; and

3.9.4 include safeguards in the internal rules of the organisation and ensure that the job specification for the position of DPO or the service contract is sufficiently precise and detailed to avoid conflicts of interest.

3.10 If you consider that the policy has not been followed in respect of Personal Data about yourself or others you should raise the matter with the DPO.

4. Definition of terms

4.1 **Biometric Data** means Personal Data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images;

4.2 **Consent** of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her;

4.3 **Data** is information which is stored electronically, on a computer, or in certain paper-based filing systems or other media such as CCTV;

4.4 **Data Subjects** for the purpose of this policy include all living individuals about whom we hold Personal Data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their Personal Data.

4.5 **Data Controllers** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

4.6 **Data Users** include employees, volunteers, governors whose work involves using Personal Data. Data Users have a duty to protect the information they handle by following our data protection and security policies at all times;

4.7 **Data Processors** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller;

4.8 **Parent** has the meaning given in the Education Act 1996 and includes any person having parental responsibility or care of a child;

4.9 **Personal Data** means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

4.10 **Personal Data Breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed;

4.11 **Privacy by Design** means implementing appropriate technical and organisational measures in an effective manner to ensure compliance with the GDPR;

4.12 **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

4.13 **Sensitive Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

5. Data protection principles

5.1 Anyone processing Personal Data must comply with the enforceable principles of good practice. These provide that Personal Data must be:

5.1.1 processed lawfully, fairly and in a transparent manner in relation to individuals;

5.1.2 collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

5.1.3 adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

5.1.4 accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

5.1.5 kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data are processed; Personal Data may be stored for longer periods insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

5.1.6 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.

6. Processed lawfully, fairly and in a transparent manner

6.1 The GDPR is intended not to prevent the processing of Personal Data, but to ensure that it is done fairly and without adversely affecting the rights of the Data Subject. The Data Subject must be told who the Data Controller is (in this case the School), who the Data Controller's representative is (in this case the DPO), the purpose for which the data is to be Processed by us, and the identities of anyone to whom the Data may be disclosed or transferred.

6.2 For Personal Data to be processed lawfully, certain conditions have to be met. These may include:

6.2.1.1 where we have the Consent of the Data Subject;

6.2.1.2 where it is necessary for compliance with a legal obligation;

6.2.1.3 where processing is necessary to protect the vital interests of the Data Subject or another person;

6.2.1.4 where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

6.3 Personal data may only be processed for the specific purposes notified to the Data Subject when the data was first collected, or for any other purposes specifically permitted by the Act. This means that Personal Data must not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the Data Subject must be informed of the new purpose before any processing occurs.

6.4 Sensitive Personal Data

6.4.1 The School will be processing Sensitive Personal Data about our stakeholders. We recognise that the law states that this type of Data needs more protection. Therefore, Data Users must be more careful with the way in which we process Sensitive Personal Data.

6.4.2 When Sensitive Personal Data is being processed, as well as establishing a lawful basis (as outlined in paragraph 5.1 above), a separate condition for processing it must be met. In most cases the relevant conditions are likely to be that:

6.4.2.1 the Data Subject's explicit consent to the processing of such data has been obtained

6.4.2.2 processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the Data Subject;

6.4.2.3 processing is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent;

6.4.2.4 processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Data Controller or of the Data Subject in the field of employment law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the Data Subject.

6.4.3 The School recognises that in addition to Sensitive Personal Data, we are also likely to Process information about our stakeholders which is confidential in nature, for example, information about family circumstances, child protection or safeguarding issues. Appropriate safeguards must be implemented for such information, even if it does not meet the legal definition of Sensitive Personal Data.

6.5 Criminal convictions and offences

6.5.1 There are separate safeguards in the GDPR for Personal Data relating to criminal convictions and offences.

6.5.2 It is likely that the School will Process Data about criminal convictions or offences. This may be as a result of pre-vetting checks we are required to undertake on staff and governors or due to information which we may acquire during the course of their employment or appointment.

6.5.3 In addition, from time to time we may acquire information about criminal convictions or offences involving pupils or Parents. This information is not routinely collected and is only likely to be processed by the School in specific circumstances, for example, if a child protection issue arises or if a parent / carer is involved in a criminal matter.

6.5.4 Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

6.6 Transparency

6.6.1 One of the key requirements of the GDPR relates to transparency. This means that the School must keep Data Subjects informed about how their Personal Data will be processed when it is collected.

6.6.2 One of the ways we provide this information to individuals is through a privacy notice which sets out important information what we do with their Personal Data. The School has developed privacy notices for the following categories of people:

6.6.2.1 Pupils- Appendix 8

6.6.2.2 Parents- Appendix 7

6.6.2.3 Staff- Appendix 6

6.6.2.4 Governors- Appendix 5

6.6.3 The School wishes to adopt a layered approach to keeping people informed about how we process their Personal Data. This means that the privacy notice is just one of the tools we will use to communicate this information. Employees are expected to use other appropriate and proportionate methods to tell individuals how their Personal Data is being processed if Personal Data is being processed in a way that is not envisaged by our privacy notices and / or at the point when individuals are asked to provide their Personal Data, for example, where Personal Data is collected about visitors to School premises or if we ask people to complete forms requiring them to provide their Personal Data.

6.6.4 We will ensure that privacy notices are concise, transparent, intelligible and easily accessible; written in clear and plain language, particularly if addressed to a child; and free of charge.

6.7 Consent

6.7.1 The School must only process Personal Data on the basis of one or more of the lawful bases set out in the GDPR, which include Consent. Consent is not the only lawful basis and there are likely to be many circumstances when we process Personal Data and our justification for doing so is based on a lawful basis other than Consent.

6.7.2 A Data Subject consents to Processing of their Personal Data if they indicate agreement clearly either by a statement or positive action to the Processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity are unlikely to be sufficient. If Consent is given in a document which deals with other matters, then the Consent must be kept separate from those other matters.

6.7.3 In the event that we are relying on Consent as a basis for Processing Personal Data about pupils, if a pupil is aged under 13, we will need to obtain Consent from the Parent(s). Consent is likely to be required if, for example, the School wishes to use a photo of a pupil on its website or on social media. Consent is also required is also required before any pupils are signed up to online learning platforms. Such Consent must be from the Parent as the pupil is aged under 13. When relying on Consent, we will make sure that the child understands what they are consenting to, and we will not exploit any imbalance in power in the relationship between us.[2]

6.7.4 Data Subjects must be easily able to withdraw Consent to Processing at any time and withdrawal must be promptly honoured. Consent may need to be refreshed if we intend to Process Personal Data for a different and incompatible purpose which was not disclosed when the Data Subject first consented.

6.7.5 Unless we can rely on another legal basis of Processing, Explicit Consent is usually required for Processing Sensitive Personal Data. Often we will be relying on another legal basis (and not require Explicit Consent) to Process most types of Sensitive Data.

6.7.6 Evidence and records of Consent must be maintained so that the School can demonstrate compliance with Consent requirements.

7. Specified, explicit and legitimate purposes

7.1 Personal data should only be collected to the extent that it is required for the specific purpose notified to the Data Subject, for example, in the Privacy Notice or at the point of collecting the Personal Data. Any data which is not necessary for that purpose should not be collected in the first place.

7.2 The School will be clear with Data Subjects about why their Personal Data is being collected and how it will be processed. We cannot use Personal Data for new, different or incompatible purposes from that disclosed when it was first obtained unless we have informed the Data Subject of the new purposes and they have Consented where necessary.

8. Adequate, relevant and limited to what is necessary

8.1 The School will ensure that the Personal Data collected is adequate to enable us to perform our functions and that the information is relevant and limited to what is necessary.

8.2 In order to ensure compliance with this principle, the School will check records at appropriate intervals for missing, irrelevant or seemingly excessive information and may contact Data Subjects to verify certain items of data.

8.3 Employees must also give due consideration to any forms stakeholders are asked to complete and consider whether the all the information is required. We may only collect Personal Data that is needed to operate as a school functions and we should not collect excessive data. We should ensure that any Personal Data collected is adequate and relevant for the intended purposes.

8.4 The School will implement measures to ensure that Personal Data is processed on a 'Need to Know' basis. This means that the only members of staff or governors who need to know Personal Data about a Data Subject will be given access to it and no more information than is necessary for the relevant purpose will be shared. In practice, this means that the School may adopt a layered approach in some circumstances, for example, members of staff or governors may be given access to basic information about a pupil or employee if they need to know it for a particular purpose but other information about a Data Subject may be restricted to certain members of staff who need to know it, for example, where the information is Sensitive Personal Data, relates to criminal convictions or offences or is confidential in nature (for example, child protection or safeguarding records).

8.5 When Personal Data is no longer needed for specified purposes, it must be deleted or anonymised in accordance with the School's data retention guidelines.

9. Accurate and, where necessary, kept up to date

9.1 Personal data must be accurate and kept up to date. Information which is incorrect or misleading is not accurate and steps should therefore be taken to check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data should be destroyed.

9.2 If a Data Subject informs the School of a change of circumstances their records will be updated as soon as is practicable.

9.3 Where a Data Subject challenges the accuracy of their data, the School will immediately mark the record as potentially inaccurate, or 'challenged'. In the case of any dispute, we shall try to resolve the issue informally, but if this proves impossible, disputes will be referred to the Data Protection Officer for their judgement. If the problem cannot be resolved at this stage, the Data Subject should refer their complaint to the Information Commissioner's Office. Until resolved the 'challenged' marker will remain and all disclosures of the affected information will contain both versions of the information.

9.4 Notwithstanding paragraph 8.3, a Data Subject continues to have rights under the GDPR and may refer a complaint to the Information Commissioner's Office regardless of whether the procedure set out in paragraph 8.3 has been followed.

10. Data to be kept for no longer than is necessary for the purposes for which the Personal Data are processed

10.1 Personal data should not be kept longer than is necessary for the purpose for which it is held. This means that data should be destroyed or erased from our systems when it is no longer required.

10.2 It is the duty of the DPO, after taking appropriate guidance for legal considerations, to ensure that obsolete data are properly erased. The School has a retention schedule for all data.

11. Data to be processed in a manner that ensures appropriate security of the Personal Data

11.1 The School has taken steps to ensure that appropriate security measures are taken against unlawful or unauthorised processing of Personal Data, and against the accidental loss of, or damage to, Personal Data. Data Subjects may apply to the courts for compensation if they have suffered damage from such a loss.

11.2 The GDPR requires us to put in place procedures and technologies to maintain the security of all Personal Data from the point of collection to the point of destruction.

11.3 We will develop, implement and maintain safeguards appropriate to our size, scope, our available resources, the amount of Personal Data that we own or maintain on behalf of others and identified risks (including use of encryption and Pseudonymisation where applicable). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of Personal Data.

11.4 Data Users are responsible for protecting the Personal Data we hold. Data Users must implement reasonable and appropriate security measures against unlawful or unauthorised Processing of Personal Data and against the accidental loss of, or damage to, Personal Data. Data Users must exercise particular care in protecting Sensitive Personal Data from loss and unauthorised access, use or disclosure.

11.5 Data Users must follow all procedures and technologies we put in place to maintain the security of all Personal Data from the point of collection to the point of destruction. Data Users must comply with all applicable aspects of our data protection policy, online safety policy and records management policy and retention schedule, and not attempt to circumvent the administrative, physical and technical safeguards we implement and maintain in accordance with the GDPR and relevant standards to protect Personal Data.

11.6 Maintaining data security means guaranteeing the confidentiality, integrity and availability of the Personal Data, defined as follows:

11.6.1 **Confidentiality** means that only people who are authorised to use the data can access it.

11.6.2 **Integrity** means that Personal Data should be accurate and suitable for the purpose for which it is processed.

11.6.3 **Availability** means that authorised users should be able to access the data if they need it for authorised purposes.

11.7 It is the responsibility of all members of staff and governors to work together to ensure that the Personal Data we hold is kept secure. We rely on our colleagues to identify and report any practices that do not meet these standards so that we can take steps to address any weaknesses in our systems. Anyone who has any comments or concerns about security should notify the Headteacher or the DPO.

11.8 Please see our data protection policy, online safety policy and records management policy and retention schedule. [3]

11.9 Governors

11.9.1 Governors are likely to process Personal Data when they are performing their duties, for example, if they are dealing with employee issues, pupil exclusions or parent complaints. Governors should be trained on the School's data protection processes as part of their induction and should be informed about their responsibilities to keep Personal Data secure. This includes:

11.9.1.1 Ensure that Personal Data which comes into their possession as a result of their School duties is kept secure from third parties, including family members and friends;

11.9.1.2 Ensure they are provided with a copy of the School's Data Security Policy.

11.9.1.3 Using a School email account for any School-related communications;

11.9.1.4 Ensuring that any School-related communications or information stored or saved on an electronic device or computer is password protected and encrypted;

11.9.1.5 Taking appropriate measures to keep Personal Data secure, which includes ensuring that hard copy documents are securely locked away so that they cannot be access by third parties.

11.9.2 Governors will be asked to read and sign an Acceptable Use Agreement.-Appendix 2

12. Processing in line with Data Subjects' rights

12.1 Data Subjects have rights when it comes to how we handle their Personal Data. These include rights to:

12.1.1 withdraw Consent to Processing at any time;

12.1.2 receive certain information about the Data Controller's Processing activities;

12.1.3 request access to their Personal Data that we hold;

12.1.4 prevent our use of their Personal Data for direct marketing purposes;

12.1.5 ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed or to rectify inaccurate data or to complete incomplete data;

12.1.6 restrict Processing in specific circumstances;

12.1.7 challenge Processing which has been justified on the basis of our legitimate interests or in the public interest;

12.1.8 request a copy of an agreement under which Personal Data is transferred outside of the EEA;

[3]It is imperative that schools / trusts have a robust data security policy in place which sets out in detail the steps that you take to keep data secure. This will need to cover all aspects of data security in your organisation including, but not limited to, infrastructure security, user account management procedures, leavers and terminations, training, telephone security, email security, printing, internet, social media, blocked sits, use of cloud technologies, fax security, spam and risks from viruses, removable media, teleworking / homeworking environment, mobile devices, laptops, wireless internet, disposals of PCs / servers, lost devices, access control to secure areas, data transfer, access to physical files and all other equipment, personal devices and email accounts, CCTV, use of firewall, patch management and hardware changes, offsite storage.

12.1.9 object to decisions based solely on Automated Processing, including profiling (Automated Decision Making);

12.1.10 prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else;

12.1.11 be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms;

12.1.12 make a complaint to the supervisory authority (the ICO); and

12.1.13 in limited circumstances, receive or ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine readable format.

12.2 We are required to verify the identity of an individual requesting data under any of the rights listed above. Members of staff should not allow third parties to persuade them into disclosing Personal Data without proper authorisation.

13. Dealing with subject access requests

13.1 The GDPR extends to all Data Subjects a right of access to their own Personal Data. A formal request from a Data Subject for information that we hold about them must be made in writing. The School can invite a Data Subject to complete a form but we may not insist that they do so.

13.2 It is important that all members of staff are able to recognise that a written request made by a person for their own information is likely to be a valid Subject Access Request, even if the Data Subject does not specifically use this phrase in their request or refer to the GDPR. In some cases, a Data Subject may mistakenly refer to the "Freedom of Information Act" but this should not prevent the School from responding to the request as being made under the GDPR, if appropriate. Some requests may contain a combination of a Subject Access Request for Personal Data under the GDPR and a request for information under the Freedom of Information Act 2000 ("FOIA"). Requests for information under the FOIA must be dealt with promptly and in any event within 20 school days.

13.3 Any member of staff who receives a written request of this nature must immediately forward it to the DPO as the statutory time limit for responding is **one calendar month**. Under the Data Protection Act 1998 (DPA 1998), Data Controllers previously had 40 calendar days to respond to a request.

13.4 As the time for responding to a request does not stop during the periods when the School is closed for the holidays, we will attempt to mitigate any impact this may have on the rights of data subjects to request access to their data by implementing the following measures: DPO email account to be checked weekly during the school holidays.

13.5 A fee may no longer be charged to the individual for provision of this information (previously a fee of £10 could be charged under the DPA 1998).

13.6 The School may ask the Data Subject for reasonable identification so that they can satisfy themselves about the person's identity before disclosing the information.

13.7 In order to ensure that people receive only information about themselves it is essential that a formal system of requests is in place.

13.8 A Parent would normally be expected to make a request on a child's behalf if the child is younger than 13 years of age.

13.9 Requests from pupils who do not appear to understand the nature of the request will be referred to their Parents or carers.

13.10 Requests from Parents in respect of their own child will be processed as requests made on behalf of the Data Subject (the child) where the pupil is aged under 13 (subject to any exemptions that apply under the Act or other legislation). [4]

13.11 It should be noted that the Education (Pupil Information) (England) Regulations 2005 (the "Regulations") applies to maintained schools so the rights available to parents in those Regulations to access their child's educational records apply to the School. This means that following receipt of a request from a parent for a copy of their child's educational records, the School must provide a copy within 15 school days, subject to any exemptions or court orders which may apply. The School may charge a fee for providing a copy of the educational record, depending on the number of pages as set out in the Regulations. This is a separate statutory right that parents of children who attend maintained schools have so such requests should not be treated as a subject access request.

13.12 Following receipt of a subject access request, and provided that there is sufficient information to process the request, an entry should be made in the School's Subject Access log book, showing the date of receipt, the Data Subject's name, the name and address of requester (if different), the type of data required (e.g. Student Record, Personnel Record), and the planned date for supplying the information (not more than one calendar month from the request date). Should more information be required to establish either the identity of the Data Subject (or agent) or the type of data requested, the date of entry in the log will be date on which sufficient information has been provided.

13.13 Where requests are "manifestly unfounded or excessive", in particular because they are repetitive, the School can:

13.13.1 charge a reasonable fee taking into account the administrative costs of providing the information; or

13.13.2 refuse to respond.

13.14 Where we refuse to respond to a request, the response must explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month. Members of staff should refer to any guidance issued by the ICO on Subject Access Requests and consult the DPO before refusing a request.

13.15 Certain information may be exempt from disclosure so members of staff will need to consider what exemptions (if any) apply and decide whether you can rely on them. For example, information about third parties may be exempt from disclosure. In practice, this means that you may be entitled to withhold some documents entirely or you may need to redact parts of them. Care should be taken to ensure that documents are redacted properly. Please seek further advice or support from the DPO if you are unsure which exemptions apply.

13.16 In the context of a School a subject access request is normally part of a broader complaint or concern from a Parent or may be connected to a disciplinary or grievance for an employee. Members of staff should therefore ensure that the broader context is taken into account when responding to a request and seek advice if required on managing the broader issue and the response to the request.

14. Providing information over the telephone

14.1 Any member of staff dealing with telephone enquiries should be careful about disclosing any Personal Data held by the School whilst also applying common sense to the particular circumstances. In particular they should:

14.1.1 Check the caller's identity to make sure that information is only given to a person who is entitled to it.

14.1.2 Suggest that the caller put their request in writing if they are not sure about the caller's identity and where their identity cannot be checked.

14.1.3 Refer to their line manager or the DPO for assistance in difficult situations. No-one should feel pressurised into disclosing personal information.

15. Authorised disclosures

15.1 The School will only disclose data about individuals if one of the lawful bases apply.

15.2 Only authorised and trained staff are allowed to make external disclosures of Personal Data. The School will regularly share Personal Data with third parties where it is lawful and appropriate to do so including, but not limited to, the following:

15.2.1 Local Authorities

15.2.2 the Department for Education

15.2.3 the Disclosure and Barring Service

15.2.4 the Teaching Regulation Agency

15.2.5 the Teachers' Pension Service

15.2.6 the Local Government Pension Scheme which is administered by 'Local Pension Partnership'

15.2.7 our external HR provider - HCC

15.2.8 Serco

15.2.9 Our external IT Provider - HfL

15.2.10 HMRC

15.2.11 the Police or other law enforcement agencies

15.2.12 our legal advisors and other consultants

15.2.13 insurance providers – SAS (health)

15.2.14 occupational health advisors

15.2.15 the Joint Council for Qualifications;

15.2.16 NHS health professionals including educational psychologists and school nurses;

15.2.17 Education Welfare Officers;

15.2.18 Courts, if ordered to do so;

15.2.19 Prevent teams in accordance with the Prevent Duty on schools;

15.2.20 other schools, for example, if we are negotiating a managed move and we have Consent to share information in these circumstances;

15.2.21 confidential waste collection companies;

15.3 Some of the organisations we share Personal Data with may also be Data Controllers in their own right in which case we will be jointly controllers of Personal Data and may be jointly liable in the event of any data breaches.

15.4 Data Sharing Agreements should be completed when setting up 'on-going' or 'routine' information sharing arrangements with third parties who are Data Controllers in their own right. However, they are not needed when information is shared in one-off circumstances but a record of the decision and the reasons for sharing information should be kept.

15.5 All Data Sharing Agreements must be signed off by the Data Protection Officer who will keep a register of all Data Sharing Agreements.

15.6 The GDPR requires Data Controllers to have a written contract in place with Data Processors which must include specific clauses relating to the way in which the data is Processed ("GDPR clauses"). A summary of the GDPR requirements for contracts with Data Processors is set out in Appendix 1. It will be the responsibility of the School to ensure that the GDPR clauses have been added to the contract with the Data Processor. Personal data may only be transferred to a third-party Data Processor if they agree to put in place adequate technical, organisational and security measures themselves.

15.7 In some cases Data Processors may attempt to include additional wording when negotiating contracts which attempts to allocate some of the risk relating to compliance with the GDPR, including responsibility for any Personal Data Breaches, onto the School. In these circumstances, the member of staff dealing with the contract should contact the DPO for further advice before agreeing to include such wording in the contract.

16. Reporting a Personal Data Breach

16.1 The GDPR requires Data Controllers to notify any Personal Data Breach to the ICO and, in certain instances, the Data Subject.

16.2 A notifiable Personal Data Breach must be reported to the ICO without undue delay and where feasible within 72 hours, unless the data breach is unlikely to result in a risk to the individuals.

16.3 If the breach is likely to result in high risk to affected Data Subjects, the GDPR, requires organisations to inform them without undue delay.

16.4 It is the responsibility of the DPO, or the nominated deputy, to decide whether to report a Personal Data Breach to the ICO.

16.5 We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where we are legally required to do so.

16.6 As the School is closed or has limited staff available during school holidays, there will be times when our ability to respond to a Personal Data Breach promptly and within the relevant timescales will be affected. We will consider any proportionate measures that we can implement to mitigate the impact this may have on Data Subjects when we develop our security incident response plan.

16.7 If a member of staff or governor knows or suspects that a Personal Data Breach has occurred, our security incident response plan must be followed. In particular, the DPO or such other person identified in our Security Incident Response Plan must be notified immediately. You should preserve all evidence relating to the potential Personal Data Breach.

17. Accountability

17.1 The School must implement appropriate technical and organisational measures in an effective manner, to ensure compliance with data protection principles. The School is responsible for, and must be able to demonstrate, compliance with the data protection principles.

17.2 The School must have adequate resources and controls in place to ensure and to document GDPR compliance including:

17.2.1 appointing a suitably qualified DPO (where necessary) and an executive team accountable for data privacy;

17.2.2 implementing Privacy by Design when Processing Personal Data and completing Data Protection Impact Assessments (DPIAs) where Processing presents a high risk to rights and freedoms of Data Subjects;

17.2.3 integrating data protection into internal documents including this Data Protection Policy, related policies and Privacy Notices;

17.2.4 regularly training employees and governors on the GDPR, this Data Protection Policy, related policies and data protection matters including, for example, Data Subject's rights, Consent, legal bases, DPIA and Personal Data Breaches. The School must maintain a record of training attendance by School personnel; and

17.2.5 regularly testing the privacy measures implemented and conducting periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvement effort.

18. Record keeping

18.1 The GDPR requires us to keep full and accurate records of all our Data Processing activities.

18.2 We must keep and maintain accurate records reflecting our Processing including records of Data Subjects' Consents and procedures for obtaining Consents.

18.3 These records should include, at a minimum, the name and contact details of the Data Controller and the DPO, clear descriptions of the Personal Data types, Data Subject types, Processing activities, Processing purposes, third-party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period and a description of the security measures in place. In order to create such records, data maps should be created which should include the detail set out above together with appropriate data flows.

19. Training and audit

19.1 We are required to ensure all School personnel have undergone adequate training to enable us to comply with data privacy laws. We must also regularly test our systems and processes to assess compliance.

19.2 Members of staff must attend all mandatory data privacy related training.

20. Privacy By Design and Data Protection Impact Assessment (DPIA)

20.1 We are required to implement Privacy by Design measures when Processing Personal Data by implementing appropriate technical and organisational measures (like Pseudonymisation) in an effective manner, to ensure compliance with data privacy principles.

20.2 This means that we must assess what Privacy by Design measures can be implemented on all programs/systems/processes that Process Personal Data by taking into account the following:

20.2.1 the state of the art;

20.2.2 the cost of implementation;

20.2.3 the nature, scope, context and purposes of Processing; and

20.2.4 the risks of varying likelihood and severity for rights and freedoms of Data Subjects posed by the Processing.

20.3 We are also required to conduct DPIAs in respect to high risk Processing.

20.4 The School should conduct a DPIA and discuss the findings with the DPO when implementing major system or business change programs involving the Processing of Personal Data including:

20.4.1 use of new technologies (programs, systems or processes), or changing technologies (programs, systems or processes);

20.4.2 Automated Processing including profiling and ADM;

20.4.3 large scale Processing of Sensitive Data; and

20.4.4 large scale, systematic monitoring of a publicly accessible area.

20.5 We will also undertake a DPIA as a matter of good practice to help us to assess and mitigate the risks to pupils. If our processing is likely to result in a high risk to the rights and freedom of children then a DPIA should be undertaken.

20.6 A DPIA must include:

20.6.1 a description of the Processing, its purposes and the School's legitimate interests if appropriate;

20.6.2 an assessment of the necessity and proportionality of the Processing in relation to its purpose;

20.6.3 an assessment of the risk to individuals; and

20.6.4 the risk mitigation measures in place and demonstration of compliance.

21. CCTV

21.1 The School uses CCTV in locations around the School site. This is to:

21.1.1 protect the School buildings and their assets;

21.1.2 increase personal safety and reduce the fear of crime;

21.1.3 support the Police in a bid to deter and detect crime;

21.1.4 assist in identifying, apprehending and prosecuting offenders;

21.1.5 provide evidence for the School to use in its internal investigations and / or disciplinary processes in the event of behaviour by staff, pupils or other visitors on the site which breaches or is alleged to breach the School's policies;

21.1.6 protect members of the school community, public and private property; and

21.1.7 assist in managing the school

21. Hertfordshire CCTV partnership Ltd will monitor the school's CCTV during out of school hours and during school holidays. Please refer to the school's CCTV policy for more information

22. Policy Review

22.1 It is the responsibility of the Governing Body to facilitate the review of this policy on a regular basis. Recommendations for any amendments should be reported to the DPO.

22.2 We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

23. Enquiries

23.1 Further information about the School's Data Protection Policy is available from the DPO.

23.2 General information about the Act can be obtained from the Information Commissioner's Office: www.ico.gov.uk

Document Control[5]

Date modified	Description of modification	Modified by

Linked policies

Online safety policy

Records and management policy and retention schedule

Code of conduct

Disciplinary policy

Data Breach Response Plan

Data Security Policy

[5]This policy should be reviewed by the School periodically and at least every 2 years. It is important to ensure that the DPO is aware of his or her obligations under this policy and that they receive the training and other support they need in order to fulfil this role.

Appendix 1 – GDPR Clauses

The GDPR requires the following matters to be addressed in contracts with Data Processors. The wording below is a summary of the requirements in the GDPR and is not intended to be used as the drafting to include in contracts with Data Processors.

1. The Processor may only process Personal Data on the documented instructions of the controller, including as regards international transfers. (Art. 28(3)(a))

2. Personnel used by the Processor must be subject to a duty of confidence. (Art. 28(3)(b))

3. The Processor must keep Personal Data secure. (Art. 28(3)(c) Art. 32)

4. The Processor may only use a sub-processor with the consent of the Data Controller. That consent may be specific to a particular sub-processor or general. Where the consent is general, the processor must inform the controller of changes and give them a chance to object. (Art. 28(2) Art. 28(3)(d))

5. The Processor must ensure it flows down the GDPR obligations to any sub-processor. The Processor remains responsible for any processing by the sub-processor. (Art. 28(4))

6. The Processor must assist the controller to comply with requests from individuals exercising their rights to access, rectify, erase or object to the processing of their Personal Data. (Art. 28(3)(e))

7. The Processor must assist the Data Controller with their security and data breach obligations, including notifying the Data Controller of any Personal Data breach. (Art. 28(3)(f)) (Art. 33(2))

8. The Processor must assist the Data Controller should the Data Controller need to carry out a privacy impact assessment. (Art. 28(3)(f))

9. The Processor must return or delete Personal Data at the end of the agreement, save to the extent the Processor must keep a copy of the Personal Data under Union or Member State law. (Art. 28(3)(g))

10. The Processor must demonstrate its compliance with these obligations and submit to audits by the Data Controller (or by a third party mandated by the controller). (Art. 28(3)(h))

11. The Processor must inform the Data Controller if, in its opinion, the Data Controller's instructions would breach Union or Member State law. (Art. 28(3)

Appendix 2 - Online Safety Acceptable Use Agreement

School name: Featherstone Wood Primary School

Online safety lead : Miss K Shurmer Elliott

Designated Safeguarding Lead (DSL): Louise Shuttleworth (Head Teacher)

This agreement forms part of your professional and safeguarding responsibility in the school. You must read and sign this agreement. This will be kept on record and you should retain your own copy for reference.

Internet, mobile and digital technologies are part of our daily working life and this agreement is designed to ensure that all staff and governors are aware of their responsibilities in relation to their use. You are expected to adhere to this agreement. Any concerns or clarification should be discussed with Louise Shuttleworth (or with an assistant head in her absence). Breaches will be investigated, recorded and, where appropriate, disciplinary procedures will apply and police involvement will be sought.

The school's online safety policy will provide further detailed information as required.

Internet Access

I will not access or attempt to access any sites that contain any of the following: child abuse; pornography; discrimination of any kind; promotion of prejudice against any group; promotion of illegal acts; any other information which may be illegal or offensive. Inadvertent access on school equipment must be treated as an online safety incident, reported to the online safety lead and/or DSL and an incident report completed.

Online conduct

I will ensure that my online activity, both in and outside school, will not bring the school, my professional reputation, or that of others, into disrepute.

I will not browse, download, upload or distribute any material that could be considered offensive, illegal or discriminatory. Exceptionally, use of controversial material as part of the curriculum should be planned and approved on every occasion (see the on-line Safety policy).

I will report any accidental access to or receipt of inappropriate materials or filtering breach to Louise Shuttleworth (or to an assistant head in her absence).

I understand that all my use of the internet and other related technologies can be traced and monitored and, should it be required, must be made available to my line manager, head teacher and others as required.

I will not give out my personal contact and online account information such as phone numbers, email address, and social media account details to pupils and/or parents/carers.

Should I need to share my professional details, such as mobile phone number or email address, with parent/carers, this must be agreed in advance as an acceptable approach with Louise Shuttleworth (or an assistant head in her absence).

Social networking

I understand the need to separate my professional role from my private friendships; in my professional capacity I will not become 'friends' with parents/carers or pupils on social networks. Where my school role is my only connection to an individual, private online contact is unacceptable with parents/carers or pupils.

Information can be shared with pupils over 13 and parents/carers through an organisational social network site/page e.g. on Facebook or Twitter, but never through a personal account or site. In my professional role in the school, I will never engage in 1-1 exchanges with pupils or parent/carers on personal social network sites.

My private account postings will never undermine or disparage the school, its staff, governors, parents/carers or pupils. Privileged information known as a result of my work in the school must remain confidential. I need to be mindful of the nature of MY posts when off sick as this may impact on my disciplinary record.

I will not upload any material about or references to the school or its community on my personal social networks.

I understand school information **must only** be passed through school approved social media groups, for example WhatsApp. A member of SLT must be part of any group to ensure accuracy of information sharing.

Passwords

I must clarify what access I may have to the internet and/or school systems. If I have access of any kind, I understand that there is no occasion when a password should be shared with a pupil or anyone who is not a staff member.

Data protection

I will follow all requirements for data protection explained to me by the school. These include:

- I must consult with the school before making any recordings, photographs and videos. Once agreed, these must be made on a school device.

- I understand that there are strict controls and requirements regarding the collection and use of personal data. I will follow all requirements regarding GDPR.

Images and videos

I will only upload images or videos of staff, pupils or parents/carers onto school approved sites where specific permission has been granted.

I will not take images, sound recordings or videos of tuition or wider school activities on any personal device. School devices can be used for this purpose or, in the case of 1:1 tuition, pupil's or parent/carer devices can be used, with parent/carer agreement.

Internet, mobile and digital technologies provide helpful recording functions but these cannot be made on a teacher's personal device. Recordings can be made with the child's and parent/carer's agreement on a school device, an organisational device approved by the head teacher/DSL, or a young person's or parent/carer's own device.

Use of Email

I will use my professional or formal student email address for all school business. All such correspondence should be kept professional and is open to Subject Access Requests under the Freedom of Information Act. I will not use my professional email addresses for personal matters.

Use of personal devices

I understand that when working in the school I should at no time put myself in a position where a safeguarding allegation can be made against me as a result of my use of personal devices. I understand that the use of personal devices in school is at the discretion of the head teacher.

I will only use approved personal devices in designated areas and never in front of pupils. This therefore precludes use of specialist apps on personal devices. A school device could be used to access specialist apps that support pupil learning. Pupils can also be encouraged, but not required, to access such apps on their own devices if allowed by the school and with parent/carer agreement.

Additional hardware/software

I will not install any hardware or software on school equipment without permission of Louise Shuttleworth (or an assistant head in her absence).

Promoting online safety

I understand that online safety is part of my responsibility and I will promote positive online safety messages at all times, including when setting homework, rehearsal or skill practice or when providing pastoral support.

I understand that it is my duty to support a whole school safeguarding approach and will report any behaviour (of staff, governors, visitors, pupils or parents/carers) which I believe may be inappropriate or concerning in any way to the Headteacher (or to the Deputy Head in her absence)

Classroom management of internet access

I will pre-check for appropriateness all internet sites used in the classroom; this will include the acceptability of other material visible, however briefly, on the site. I will not free-surf the internet in front of pupils.

If I am using the internet to teach about controversial issues I will secure, on every occasion, approval in advance for the material I plan to use with Louise Shuttleworth (or an assistant head in her absence).

User Signature

I agree to follow this Acceptable Use Agreement and to support online safety in my work in the school. I understand this forms part of my company/educational setting/organisation's contract with the school.

Signature ……..……..…… Date ……

Full Name ……..... (Please use block capitals)

Job Title/Role ……..……..……

Appendix 3

Online Safety Acceptable Use Agreement Primary Pupils

My online safety rules

- I will only use school IT equipment for activities agreed by school staff.
- I will not use my personal email address or other personal accounts in school when doing school work.
- I will not sign up for any online service on school devices unless this is an agreed part of a school project approved by my teacher.
- I will only open email attachments unless it has been approved by a member of school staff in school or a parent/carer out of school.
- In school I will only open or delete my files when told by a member of staff.
- I will not tell anyone other than my parents/carers my passwords. I will not use other people's usernames or passwords to pretend to be them online.
- I will make sure that all online contact that I make is responsible, polite and sensible. I will be kind and respectful at all times.
- If I come across anything upsetting, unpleasant or nasty, or anything that makes me feel unsafe, I will tell my teacher or my parent/carer immediately.
- If someone says, asks or posts about me anything upsetting, unpleasant or nasty, or anything that makes me feel unsafe, I will not reply. I will tell my teacher or my parent/carer immediately.
- I will not give out my own or others' personal information, including: name, phone number, home address, interests, schools or clubs or any personal image. I will let my teacher or parent/carer if anyone asks me online for personal information.
- I understand that some people on the internet are not who they say they are and some people are not safe to be in contact with. I will not arrange to meet someone I only know on the internet. If someone asks to meet me, I will not reply to them and I will tell a teacher or a parent/carer immediately.
- Uploading or sending my image (photographs, videos, live streaming) online puts me at risk. I will always seek permission from my teacher or

parent/carer if I wish to do this. I will not take, share or upload any image of anyone else without their permission and also, if they are a child, without their parents'/carers' permission.

- Even if I have permission, I will not upload any images, videos, sounds or words that **could** upset, now or in the future, any member of the school community, as this is cyberbullying.
- I understand that everything I do or receive online can be traced now and in the future. I know it is important to build a good online reputation.
- I understand that some personal devices are allowed in school and some are not, and I will follow the rules. I will not assume that new devices can be brought into school without getting permission.
- I will not lie about my age in order to access games, apps or social networks that are for older people as this will put me at risk.
- I understand that these rules are designed to keep me safe now and in the future. If I break the rules my teachers will look into it and may need to take action.

✂ ----------

Dear Parent/Carer,

The internet, email, mobile technologies and online resources have become an important part of learning and life. We want all pupils to be safe and responsible when using any IT. It is essential that pupils are aware of online risk, know how to stay safe and know where to go to report problems or to get help.

Please read through these online safety rules with your child and talk with them to ensure they understand their importance and what it means for them (and for you). When you have done this, you both need to sign it to say that you agree to follow the rules. Any concerns or explanation can be discussed with Miss Shuttleworth- Head Teacher or Miss Haynes- Deputy Head..

Please return the signed sections of this form which will be kept on record at the school.

Pupil agreement

Pupil name .....

This agreement is to keep me safe. I have discussed this agreement with my parents/carers and understand the commitment I have made and my responsibilities.

Pupil signature .....

Appendix 4

Parent/s Carer/s agreement

Parent/s Carer/s name/s .....

I/we have discussed this agreement, which highlights the associated risks when accessing the internet, mobile and digital technologies, with our child. I/we agree to support them in following the terms of this agreement.

I/we also agree not share school related information or images online or post material that may bring the school or any individual within it into disrepute.
(Rather than posting negative material online, any parent, distressed or concerned about an aspect of school should make immediate contact with a member of staff. Negative postings about the school would impact on the reputation of the whole school community. Parents are encouraged to report breaches so that we can protect the reputation of the school, staff, pupils and parents.)

I/we also agree only to use personal mobile phones and devices in designated areas of the school unless otherwise informed, e.g. for specific events and activities. I/we understand that under no circumstance should images be taken at any time on school premises of anyone other than our own child/ren, unless there is a pre-specified agreement. I/we understand that when on school premises, but not in a designated area where phones can be used, they must be switched off and out of sight.

Parent/carer signature .....

Date .....

Appendix 5

Privacy Notice – Governors/Trustees Data

What is this Privacy Notice for?
Featherstone Wood Primary School is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you, and who we share it with, before, during and after your relationship with us as a governor/trustee] in accordance with the General Data Protection Regulation (GDPR).
Why do we collect and use your information?
We collect personal information about governors / trustees through the application and recruitment process. We process this data for legal obligations, to support our function of running a school and for safeguarding purposes. Where we collect data not covered by these reasons we will ask for your consent. This consent can be withdrawn at any time.
What information do we collect, hold and share?
This is a wide range of information from name, date of birth, contact details etc. to information acquired as part of your application to become a governor/trustee.
How long do we keep the information?
We hold data securely for specific periods, as recommended by both national and local guidelines. Certain types of data may be held for longer, e.g. safeguarding. For more information on the recommended timescales please see our data retention policy
Who do we share your information with?
We may share information with the DfE, the Local Authority, and other bodies and organisations. We do not share information with anyone without consent unless the law or our policies allow us to do so. When we share personal data, we will provide the minimum amount necessary to fulfil the purpose for which it is required.

How can you request access to the information we hold?
You have the right to request access to information about you that we hold via a Subject Access Request (SAR). To make a request for your personal data, contact our Data Protection Officer. The legal timescales for the school to respond to a Subject Access Request is one calendar month. As the school has limited staff resources outside of term time, we encourage you to submit Subject Access Requests during term time and to avoid sending a request during periods when the school is closed or is about to close for the holidays, if possible. This will assist us in responding to your request as promptly and fully as possible.
For more information about Data Protection Regulations and your rights see:
https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/
If you have a concern about the way we are collecting or using your personal data, please raise with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/
If you would like to discuss anything in this privacy notice, please contact:
j.simpkin@featherstonewood.herts.sch.uk

Appendix 6

Privacy Notice – Staff Data

What is this Privacy Notice for?
Featherstone Wood Primary School is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you and who we share it with, before, during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all employees, workers and contractors.
Why do we collect and use staff information?
We need data from you primarily to allow us to perform our contract with you, but also because we have a legal obligation to submit staff data to the Department for Education (DfE) and the Local Authority as well as other regulatory bodies. We also use your data to support our function of running a school and for safeguarding purposes. Where we collect data not covered by these reasons we will ask for your consent. This consent can be withdrawn at any time. To find out more about the data collection requirements placed on us by the DfE (for example; via the School Workforce census) go to: https://www.gov.uk/education/data-collection-and-censuses-for-schools
What staff information do we collect, hold and share?
This is a wide range of information from name, date of birth, ethnicity etc. to NI number, bank account details, employment records etc. For a more complete list see
How long do we keep the information?
We hold data securely for specific periods, as recommended by both national and local guidelines. Certain types of data may be held for longer, e.g. safeguarding. For more information on the recommended timescales please see our - Records Management and retention policy.

Who do we share your information with?
We may share information with the DfE, the Local Authority, and other bodies and organisations. We do not share information with anyone without consent unless the law or our policies allow us to do so. When we share personal data, we will provide the minimum amount necessary to fulfil the purpose for which it is required.
How can you request access to the information we hold?
Staff have the right to request access to information about them that we hold via a Subject Access Request (SAR). To make a request for your personal data, contact j.simpkin@featherstonewood.herts.sch.uk The legal timescales for the school to respond to a Subject Access Request is one calendar month. As the school has limited staff resources outside of term time, we encourage you to submit Subject Access Requests during term time and to avoid sending a request during periods when the school is closed or is about to close for the holidays, if possible. This will assist us in responding to your request as promptly and fully as possible.
For more information about Data Protection Regulations and your rights see:
https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/
If you have a concern about the way we are collecting or using your personal data, please raise with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/
If you would like to discuss anything in this privacy notice, please contact:

Appendix 7

Privacy Notice – Parents / Carers Data

What is this Privacy Notice for?
Featherstone Wood Primary School is committed to protecting the privacy and security of personal information. We collect data and information about parents / carers of our pupils so that we can operate effectively as a school. This privacy notice explains how and why we collect parent / carer data, what we do with it, who we share it with and what rights parents have.
Why do we collect and use parent / carer information?
We process information about parents / carers as part of our legal obligation to provide an education to our pupils, to support our function of running a school and for safeguarding purposes. Where we process data not covered by these reasons, we will ask for your consent. This consent can be withdrawn at any time.
What parent / carer information do we collect, hold and share?
This will include personal information such as name, name, address, telephone number and email address. It could also include information relating to your identity, marital status, employment status, religion, ethnicity, language, medical conditions and free school meal / pupil premium eligibility / entitlement to certain benefits, information about court orders in place affecting parenting arrangements for pupils.
How long do we keep the information?
We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements, as recommended by both national and local guidelines. Certain types of data may be held for longer, e.g. safeguarding. For more information on the recommended timescales please see: Records Management and Retention Policy.

Who do we share your information with?
We routinely share parent / carer information with schools that pupils attend after leaving us. We may share pupil information with the DfE, the Local Authority, and other bodies and organisations. We do not share information with anyone without consent unless the law or our policies allow us to do so. When we share personal data, we will provide the minimum amount necessary to fulfil the purpose for which it is required.
How can you request access to your personal data?
Parents / carers have the right to request access to information about them that we hold via a Subject Access Request (SAR). To make a request for your or your child's personal data, contact: j.simpkin@featherstonewood.sch.org.uk. The legal timescales for the school to respond to a Subject Access Request is one calendar month. As the school has limited staff resources outside of term time, we encourage you to submit Subject Access Requests during term time and to avoid sending a request during periods when the school is closed or is about to close for the holidays, if possible. This will assist us in responding to your request as promptly and fully as possible.
For more information about Data Protection Regulations and your rights see:
https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/ If you have a concern about the way we are collecting or using your personal data, please raise with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/
If you would like to discuss anything in this privacy notice, please contact:
j.simpkin@featherstonewood.herts.sch.uk

Appendix 8

Privacy Notice – Pupil Data

What is this Privacy Notice for?
Featherstone Wood Primary School is committed to protecting the privacy and security of personal information. We collect a lot of data and information about our pupils so that we can run effectively as a school. This privacy notice explains how and why we collect pupils' data, what we do with it, who we share it with and what rights parents and pupils have.
Why do we collect and use pupil information?
We have a legal obligation to submit pupil data to the Department for Education (DfE) and the Local Authority as well as other regulatory bodies. We also use pupil data to support our function of running a school and for safeguarding purposes. Where we collect data not covered by these reasons, e.g. for publishing photos on our website, we will ask for your consent. This consent can be withdrawn at any time. To find out more about the data collection requirements placed on us by the DfE (for example; via the school census) go to: https://www.gov.uk/education/data-collection-and-censuses-for-schools
What pupil information do we collect, hold and share?
This is a wide range of information from name, date of birth, ethnicity etc. to attendance, assessment, medical and safeguarding information.
How long do we keep the information?
We hold pupil data securely for specific periods, as recommended by both national and local guidelines. Certain types of data may be held for longer, e.g. safeguarding. For more information on the recommended timescales please see our Records Management and Retention policy.
Who do we share pupil information with?
We may share pupil information with the DfE, the Local Authority, and other bodies and organisations. We do not share information about pupils with anyone without consent unless the law or our policies allow us to do so. When we share personal data, we will provide the minimum amount necessary to fulfil the purpose for which it is required.

How can you request access to the pupil information we hold?
Parents and/or pupils have the right to request access to pupil information that we hold via a Subject Access Request (SAR). To make a request for your or your child's personal data, contact j.simpkin@featherstonewood.herts.sch.uk. The legal timescales for the school to respond to a Subject Access Request is one calendar month. As the school has limited staff resources outside of term time, we encourage parents / pupils to submit Subject Access Requests during term time and to avoid sending a request during periods when the school is closed or is about to close for the holidays, if possible. This will assist us in responding to your request as promptly and fully as possible.
For more information about Data Protection Regulations and your rights see:
https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/
If you have a concern about the way we are collecting or using your personal data, please raise with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/
If you would like to discuss anything in this privacy notice, please contact:
j.simpkin@featherstonewood.herts.sch.uk