# Education Sector Policy

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The Educational Sector
PERSONAL DATA PROTECTION AND PRIVACY POLICY

This Personal Data Protection and Privacy Policy (the "POLICY") sets out the requirements ensuring that *Fourlanesend C P School* with registered address *Cawsand, Torpoint, Cornwall, PL10 1LR* meet our commitment of protecting Personal Data. This Policy applies to all internal school employees (support staff, teachers, Headteacher) contractors and work experience placements (the Staff).

## THE PURPOSE OF THE POLICY

This Policy is divided in to two sections:

Section A sets out our and your responsibilities and obligations when handling Personal Data as part of your role at *Fourlanesend C P School.*

Section B sets out how we, *Fourlanesend C P School* handle Personal Data that we processes about our Staff.

## DEFINITION OF PERSONAL DATA

"Personal Data" is all information which:

relates to living person and affects that person's privacy (e.g. information about personal or family life); and

identifies a person, whether by itself, or together, with other information that we possess or are likely to come into possession of (e.g. patient's ID number, employee social security number and etc.)

"Sensitive Personal Data" is defined as:

information about individual's health, religion, race, political beliefs, trade union membership, sex life and/or criminal records.

"Processing" means:

obtaining, using, holding, amending, disclosing, destroying and deleting Personal Data.

## A. Your Responsibilities

### Key Data Processing Principles

When collecting and processing personal data, we have to ensure compliance with the key data protection principles:

#### Data Collection and Minimization

- You must only collect Personal Data by data fair, lawful means for clearly defined purposes. Only minimum Personal Data should be collected to fulfil required activities. We must let pupils and parents/guardians know how we process their Personal Data. Please see our external Privacy Notice on our website.
- When processing Sensitive Personal Data e.g. medical records, you have to ensure you collect such data only with the individual's consent and that we take extra care when handling such data. The access to such data must be limited.
- Pupil's data can be processed only with parental consent or only when it is required for lawful purposes.


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### Data Retention

- You will retain Personal Data as long as it is necessary to meet and support school activities and comply with regulatory requirements.
- You will securely dispose Personal Data when it is no longer needed.

### Accuracy

- You will take reasonable steps to ensure accuracy of any Personal Data we obtain.
- You must take steps to ensure that the Personal Data we process as a part of our role is as accurate and up to date as much possible.

### Security

- You must take appropriate steps to prevent the misuse or loss of Personal Data and to report any known or suspected instance of misuse, loss or unauthorized access to Headteacher *[Please refer to our Information Security Policy for further details]*.

### Access and Correction

- You must process Personal Data in accordance with the rights of individuals - you must be receptive to queries or requests made by individuals in connection with their personal data and where required by law, you, after consulting with *Data Protection Officer – Rebecca Norton* must provide individuals with the ability to access, correct and delete their Personal Data.
- All information containing individuals' Personal Data can be accessed by the individual. Data held electronically, in hard copies and correspondence, notes made by governors, teachers and other staff are subject to such access requests.
- We are under a statutory duty to comply with such requests, and have 40 calendar days to respond to requests.
- If a request is received from individuals by telephone, please notify the *Data Protection Officer – Rebecca Norton* and ask the third party to put their request in writing.

### Training and Awareness

- All staff will receive data handling awareness/ data protection training and will be made aware of their responsibilities as described in this Policy through:
- Induction training for new staff
- Staff meetings/briefings
- Day to day support and guidance from Data Protection
- These rules apply regardless of whether data is stored electronically, on paper or on other materials.

## B. PROCESSING OF YOUR PERSONAL DATA

### Purposes for which we process your personal data

- We may process Personal Data for the following purposes:
- general human resources purposes, for example: (i) administering payroll and benefit arrangements; (ii) obtaining management and employee satisfaction feedback; (iii) conducting appraisals, promotions and pay reviews; (iv) implementing and conducting learning and development initiatives (iv)


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conducting disciplinary and complaints procedures; (v) managing absences, e.g. sickness, parental leave and other family related and flexible working policies;

- recruitment purposes, for example to verify information provided by individuals during the recruitment process e.g. to obtain references and evidence of qualifications;
- compliance, regulatory and ethnical purposes, for example to ensure compliance with our policies regarding anti-money laundering, bribery and corruption;
- to monitor the effectiveness of our anti-discriminations policies;
- to allow us to work together and collaborate in our day-to-day business activities as well as to provide services to our customers and to ensure business continuity;
- to ensure the security of our business which may include the use of CCTV cameras, telephone recording or monitoring IT systems.


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## What personal data do we collect

We collect the following types of Personal data:

- Pupil names
- Pupil Addresses
- Staff Names
- Staff Addresses
- Medical details
- Special needs details
- Disciplinary records
- Educational attainment
- Pupil photos
- Staff professional records e.g. employment history, taxation and national insurance records

## International transfers

An international transfer occurs where Personal Data is transferred outside European Economic Area (EEA). Such transfers can be done only where certain safeguarding measures have been implemented. Please ensure that you consult with your *Data Protection Officer – Rebecca Norton* before transferring Personal Data outside EEA or engaging with the third party that transfers data outside EEA.

## SHARING PERSONAL DATA

We intend to keep all Personal Data confidential and in compliance with our statutory obligations. However, there may be circumstances where we need to share Personal Data with third parties. This should be done only in accordance with applicable legislation. We will share your Personal Data with:

- local authorities;
- other schools and educational bodies;
- social services; and agencies working within school

Pupils Personal Data can also be shared with their parents/guardians. Please consult *Data Protection Officer – Rebecca Norton*

Consider secure methods of transfer when sharing Personal Data.

We do not disclose Personal Data (including photos) on an external facing website without the individual pupil, member of staff or governor being aware.

## EXTERNAL DATA PROCESSORS

External data processors are third parties or individuals that provide us with data processing services under our instructions for purposes such as:

- payroll, benefits and management of staff records; data archiving/destruction;
- courier and dispatch services;
- confidential waste destruction;
- business or operational administration;
- learning and development, training, e-learning;
- file sharing, webinar or meeting set up; and out sourced provider we may use.

We must ensure their external data processors adopt and manage appropriate technical and organisational security measures to safeguard Personal Data.


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Before any processing by or disclosure to an external data processor, the manager of the relationship with that processor must ensure appropriate data protection and information security due diligence has been conducted to ensure the processor has appropriate measures in place. You should contact the *Data Protection Officer – Rebecca Norton* promptly and, in any event, before any data is disclosed to or contract is entered into with such processor.

MONITORING

You should refer to the *Monitoring Policy* for information about how we currently monitor use of school facilities.

The following are examples of the types of monitoring that currently take place, we may open any correspondence sent to staff at our address before it is delivered to you;

- we may also monitor the times and locations at which security passes are used by staff.
- we may monitor school premises by using CCTV.

As far as is reasonably practical, we will not monitor or access the content of private messages or correspondence. Where we believe that such monitoring is necessary and justified, we will limit the number of people who have access to the information concerned.

In the event of action being taken by us against staff based on information gathered through the monitoring activities mentioned above, that staff member will be given an opportunity to challenge and/or explain any information upon which the action is based.

## Breaches of this Data Protection Policy and Unauthorised Access to Data

Failure to comply with this policy will be treated seriously. Action may be taken under *Our Disciplinary Policy* – if you fail to comply with this Policy. The current Disciplinary and Policy is set out *on our website and displayed in our staffroom*. Please note that unauthorised accessing, deleting or use of Personal Data may potentially constitute a criminal offence.

## Reporting Security Breach

In the event where you suspect that Personal Data is being mishandled, accidently or deliberately by you or someone else, please report it to *Data Protection Officer – Rebecca Norton*

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