

Data Protection Policy

At Unsworth Primary School, the Head Teacher, overseen by the Governing Board ensures that records are maintained, including security and access arrangements, in accordance with Education Regulations and all other statutory provisions as the Data Controller. This policy complies fully with the requirements and principles of the General Data Protection Regulation (GDPR) which comes into effect on the 25th May 2018 and replaces the Data Protection Act 1998. There are 6 key principles to the GDPR that the school is accountable for through this policy:

- There must be a lawful reason for collecting personal data and it must be done in a fair and transparent way.
- Data must only be used for the reason it is initially obtained.
- No more data than is necessary should be collected.
- Data has to be accurate and there must be mechanisms in place to keep it up to date.
- Data should not be retained for longer than is necessary.
- The protection of personal data must be upheld.

At Unsworth Primary School we intend that this policy outlines and explains how data processors (companies or Service Level Agreements who access school data) or employees within the school who collect, manage, transfer or use data about our learners, staff or other individuals during the course of their work adhere to the GDPR. See Appendix 1 to read our Privacy Notices for how we use pupil and staff data.

Data Gathering

All personal data (data that relates to an individual and can identify them such as name, address, date of birth, phone numbers, photographs or videos, behaviour and assessment records) and sensitive data (data that relates to aspects of personal life such as gender, race, religion, sexuality, disability or criminal offences) which relates to staff, pupils or other people with whom the school has contact, whether held on computer or in paper files, is covered by the GDPR. The personal and sensitive data that will be protected will consist of any combination of data items that identifies an individual and gives specific information about them, their families or circumstances.

Only relevant personal data is collected, recorded, sorted, stored, disclosed, analysed or shared by the school and the person (data subject) from whom it is collected should be informed of the data's intended use. The School will check annually that the data collected is still adequate, relevant and not excessive in relation to the purpose for which the data is being held. Likewise data will not be kept for longer than is necessary. It is the duty of the school's Data Protection Officer to ensure that obsolete data is properly erased as pupils/staff leave the school.

Data Storage

All personal and sensitive data will be stored either electronically on the schools Management Information System RM Integris or within individual pupil files that are securely held. Electronic data will be protected by standard password systems operated by the school and access to this type of data is limited to identified members of staff. No personal or sensitive data (except names) will be held on teaching staff laptops or I pads. In the case of digital photographs or videos, these will be deleted once used, or where used in school digital portfolios, these will be deleted up to 1 academic year after pupils have left the school. Manual data will be stored where it is not accessible to anyone who does not have a legitimate reason to view or process the data.

Data Checking

Data held will be as accurate as is reasonably possible. The school will issue annual reminders to staff and parents to ensure that data held is up-to-date and accurate through the use of update forms. If a parent ('a person having parental responsibility or care of a child', Education Act 1996) informs the school of a change in circumstances the digital record will be updated as soon as is possible.

Access to Records

Requests for access to personal data (Subject Access Requests) must be made in writing to the Head Teacher. A Subject Access Request must include key information (e.g. full name, address and telephone number) in order for the school to verify the request. Pupils, parents and staff may request access to the personal data held about them by the school. Provided that there is sufficient information to process the request this will be done within 40 days of the request. In the case of any written request from a parent regarding their own child's record, access to the record will be provided within 15 school days in accordance with the current Education (Pupil Information) Regulations. All personal data will be sent to the requesting person in a sealed envelope.

Data Disclosures

The School will, in general, only disclose data about individuals with their consent. However, there are circumstances under which the Head Teacher may need to disclose data without explicit consent for that occasion. These circumstances are strictly limited to:

- Pupil data disclosed to authorise recipients related to education and administration for the school to perform its statutory duties and obligations.
- Pupil data disclosed to authorised recipients in respect of the child's health, safety and welfare.
- Pupil data disclosed to parents in respect of their child's progress, achievements and attendance.
- Staff data disclosed to relevant authorities e.g. payroll and administration
- Disclosures to Police Officers if they are able to supply a written request which notifies the school of a specific and legitimate need to have access to specific personal data.

A record should be kept (within the personal data file) of any personal data disclosed so that the recipient can be informed if the data is later found to be inaccurate. Data is not used in newsletters, websites or other media without prior consent. This includes the use of photographs/videos. All parents are asked to give consent for this across the different platforms that the school uses on admission to the school. A list of children who do not have permission is held by the Admin staff and circulated to staff annually.

Data and Computer Security

The School undertakes to ensure the security of personal data by the following general methods:

Physical Security

Appropriate building security measures are in place (lockable systems in the office). All printouts are locked in a secured place when not in use. Visitors to the school are required to digitally sign in, to wear identification badges and, where appropriate, are accompanied.

Logical Security

The school server is compartmentalised, so that users only have access to digital files that are deemed appropriate for their level of access. Passwords are generated and provided by the School Technician, who sets the appropriate access level as agreed by the Head Teacher. No memory sticks or hard drives are used within the school by members of staff or visitors, to ensure that personal or sensitive data is not downloaded or transferred off site. In the case of Supply or Student Teachers, restricted access to digital systems is in place to

ensure that no access to personal or sensitive data is available. Computer files are backed up regularly and stored within the locked Server Cabinet in the Reprographics room. All desktops throughout the school are set to time out within 10 minutes of inactivity to ensure that access to the server is password protected. Regular password changes are in force across the network and the school MIS.

Procedural Security

All staff are aware of their Data Protection responsibilities and the procedures in place for accessing personal data. These procedures are monitored and reviewed on a regular basis, especially if a security loophole becomes apparent.

Responsibility

Individual members of staff can be personally liable in law under the terms of the GDPR. They may also be subject to claims for damages from persons who believe that they have been harmed as a result of inaccuracy, unauthorized use or disclosure of their data. A deliberate breach of this policy will be treated as a disciplinary matter. Any queries or concerns about the security of data in school should, in the first instance, be referred to the Head Teacher.

Compiled by A Rhodes February 2018