

Data Protection

Glenwood School



Reviewed	Josie Payne
Review Annually	September
Approval	FGB
Approved	July 2020

Glenwood School collects and uses personal information (referred to in the General Data Protection Act as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information, this includes health information, details about recipients of pupil premium, employee references, safeguarding information about an individual and exam pupil references and results.

The school is the Data Controller, of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer (Liz Grady), who may be contacted at Glenwood School 01243 373120.

The school issues Privacy Notices (also known as Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data.

To be read and applied in conjunction with Hampshire Schools Retention Schedule.

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the General Data Protection Regulations (GDPR), and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

What is Personal Information data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data and an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

1. Personal data shall be processed lawfully, fairly and in a transparent manner
2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes)
3. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive;

4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. Personal data shall be processed in a manner that ensures appropriate security of the person

Duties

Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection; including determining who the data controllers and processors are and where data is stored. The data protection officer will contact anyone the school shares personal data with within the EEA to explain RMS can still share personal data lawfully with them once the UK leaves the EU.

GDPR will be incorporated into UK law if there's a no-deal Brexit, this and the Data Protection Act 2018 will continue to apply to data transferred within or from the UK.

Data Protection Impact Assessments (DPIA) and privacy notices

Data Protection Impact Assessments (DPIA) are reviewed and updated annually in order to reflect the school's way of working and to follow HCC policies and protocol.

Data Controllers have a General Duty of accountability for personal data.

Living and working in the EU

Living and working in an EU country after Brexit depends on the rules in that country.

Staff who are employed by Glenwood School may need to register or apply for residency, check if they're covered for healthcare, and exchange their UK driving license for a license issued by the UK. Staff who are an EU citizen will need to apply to the settlement scheme if they and/or their family are from the EU, Switzerland, Norway, Iceland or Liechtenstein.

Commitment

The school is committed to maintaining the principles and duties in the GDPR at all times. Therefore, the school will:

- Inform individuals of the identity and contact details of the data controller
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this.

- If the school plans to transfer personal data outside the EEA, the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information
- Inform individuals of their data subject rights
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point
- Provide details of the length of time an individual's data will be kept
- Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected the school shall inform the individual and where necessary seek consent
- Check the accuracy of the information it holds and review it at regular intervals
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Ensure that personal information is not retained longer than it is needed
- Ensure that when information is destroyed that it is done so appropriately and securely
- Share personal information with others only when it is legally appropriate to do so and where appropriate hand deliver personal files, obtaining a receipt. If this is not achievable a courier will be used and files delivered will require a signed receipt
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests)
- Ensure that personal information is not transferred outside the EEA without the appropriate safeguards
- Ensure that all staff and governors are aware of and understand these policies and procedures.
- Ensure that on the school social media page (Facebook), no photos of children, individuals details or other personal information is shared on this platform.

Complaints

Complaints will be dealt with in accordance with the school's Complaints Policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every two years. The policy review will be undertaken by the Headteacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Liz Grady at Liz.Grady@glenwood.hants.sch.uk, who will also act as the contact point for any Subject Access Requests.