



Data Protection Policy

Weetwood Primary School

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Purpose

The purpose of the policy is to help the organisation towards compliance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA18).

Scope

The policy applies to our staff who are **processing** personal data on behalf of our organisation. **Personal data** is any information which identifies a living individual.

Registration

- We will ensure we pay a fee towards the Information Commissioners office as a data controller. <https://ico.org.uk/media/for-organisations/documents/2258205/dp-fee-guide-for-controllers-20180221.pdf>
- We will inform the ICO the details of the Data Protection Officer.

Process information fairly, lawfully and transparently

- To process information fairly we will make it clear to individuals how we will use their information. We may do this by providing statements on forms, leaflets etc. posting notices on the website, or verbally, or in phone messages, for example using a [privacy notice](#).
- To process personal information lawfully we will meet at least one of the conditions under an [Article 6](#) lawful basis. In the case of [special categories of data](#) at least one of the [Article 9](#) conditions will be met in addition to a lawful basis condition.

Obtain and use information for specific, explicit and legitimate purpose

- We will only collect and process personal data for a specific purpose that the individual is aware of. If we want to use the data for any additional ([secondary](#)) purpose we will make the individual aware before doing so.

Only collect the right amount and correct data required

- We will only collect the right and enough personal data required to undertake the necessary processing.

Keep information accurate and up to date

- We will put measures in place to ensure that personal information is accurate and all databases, lists, etc. are up to date.

Ensure personal data is kept up to date and only kept for as long as necessary

- We will ensure we have checks in place to review the data we hold and that it is correct.
- We will have processes to ensure incorrect data can be amended.
- We will develop and maintain [retention schedules](#) for information, make sure staff are aware of and use the retention schedules.
- We will develop and maintain a [schedule of information assets](#) and ensure staff are aware of and use the schedule correctly.

Ensure information is held securely

- We will have measures in place to prevent unauthorised access to information. These may include technical and physical controls and we will protect information held on paper and electronically. 'Appropriate' levels of security are required depending on the sensitivity of information or the harm that could result from data being accidentally or deliberately accessed.
- If conducting a change e.g. purchasing a new system or changing a process, which may result in a high risk to individuals interest we will undertake a data protection risk assessment (DPIA) and inform the ICO if required

Ensure we are aware of an individuals' rights in relation to their own information

The **individual** is the person whose personal information we are processing. Their rights include, having the right:

- to be informed of what is being done with their information;
- to see and/or access to their own information, a [subject access request](#);
- to have their information deleted in certain circumstances;
- to stop the use of their information for marketing purposes;
- to object to certain types of processing;
- to ask that automated decisions (i.e. those made by a machine) be reviewed by a human, and
- to have inaccurate information corrected or marked;
- to claim compensation for damages caused by breach of the act.

Additional Information

We will ensure that our organisation:

- Undertakes regular training of staff, including during induction, to ensure they understand their responsibilities under the above headings;
- Provides information so that staff understand and recognise a breach of the data protection act and know what to do, see information security policy;
- Has a procedure for undertaking a subject access request, and that staff recognise a request and how to deal with it: see SAR process;
- Conducts regular audits or checks to ensure personal data is kept up to date, accurate and not kept longer than necessary;
- Has a process to review information risks and refer to the ICO if required;
- Has a process to deal with complaints from individuals and a process to refer to the ICO.
- Considers the ICO's Code of Practice on Data Sharing - <https://ico.org.uk/for-organisations/guide-to-data-protection/data-sharing/>, when sharing personal data with partner or third party organisations.
- Appoint a [Data Protection Officer, if required](#).

Exemptions

- There are exemptions to the act which apply in certain circumstances for example, looking after vulnerable people or prevention or detection of crime. Refer to the ICO website for further information.

Glossary	
Processing	Processing” broadly means collecting, using, disclosing, retaining or disposing of personal data
Personal data	Any information about or relating to an identified or identifiable living individual (see below for examples of personal data)
Sensitive personal data	This is information concerning an individual’s racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or biometric data
DPIA	A Data Protection Impact Assessment (DPIA) is a process to help identify and minimise the data protection risks of a project.
Individual	Relating to a person
Article 6	Processing of personal data needs to meet a condition of Article 6 (see table below)
Article 9	If processing of data is sensitive personal data, needs to meet a condition of Article 6 and a condition of Article 9 (see below)
Secondary purpose	The processing of data than otherwise intended when collected
Privacy notice	A privacy notice is an externally facing notice or message, telling customers, regulators and other stakeholders what the organization does with the personal information it has collected
Retention schedule	A document that lists the names of the record series produced by the organisation, along with their agreed retention periods and disposition methods
Schedule of Information Assets	A list of personal and non-personal information assets the organisation owns, including information about the asset e.g. retention and storage details, asset owners, etc.
Subject Access Request	A request made by or on behalf of an individual which they are entitled to under section 7 of the Data protection act (see above regarding the individuals rights to their own information)
European economic area	The European Economic Area (EEA) is the area in which the Agreement on the EEA provides for the free movement of persons, goods, services and capital within the European Single Market (see below for a list of member states).
Data Protection Officer	Advise and monitor data protection compliance, ensure staff are educated and trained in compliance and data processing activities, ensure audits are conducted on information held and a record of information processing is maintained, ensure there is a named contact in regards of individuals exercising their data rights.

Personal data	Special Categories of Data
Includes but not limited to: Full name Home Address Telephone number Email address NI Number Vehicle registration Face, fingerprints	Race Ethnic origin Politics Religion Trade Union membership Genetics Biometrics (where used for ID purposes eg fingerprint registration) Health Sex life Sexual orientation

Article 6 processing conditions	Special Category processing conditions
Consent Contractual Legal obligation Vital Interest Public Task Legitimate Interest	Explicit consent Employment or social security law Vital interests Not-for-profit Manifestly made public by the individual Legal claims Substantial public interest authorised by law Medical purposes Public health interest Archiving public interest