



FOUR MARKS CHURCH OF ENGLAND PRIMARY SCHOOL

Data Protection Policy

Name of Unit/Premises/Centre/School	Four Marks CE Primary School
Date Policy First Agreed	March 2020
Date of Last Policy Review	November 2024
Date of next Review	November 2028
Name of Responsible Manager/Headteacher	Veronica Stoodley
Signature of Responsible Manager/Headteacher	
Summary of changes	Name of Data Controller changed p.3

The policy reflects our Christian ethos.

The school collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about staff, pupils, governors, 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.

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, who may be contacted at Data Protection Officer, c/o The School Office.

The school issues Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents, governors and staff. These summarise the personal information held about pupils, governors 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.

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the 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, 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.

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

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
- 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

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

Subject Access Requests*

You have the right to ask the school whether or not we are using or storing your, or your child's, personal information. You can also ask us for copies of your, or your child's, personal information, either verbally (in person) or in writing to the Data Protection Officer via the school office. Requests that are made to, or by, other parties may not be processed until validation of the request by the DPO has been confirmed (see below).

For further guidance about how to request access to your personal information, please click on the link below:
<https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/preparing-and-submitting-your-subject-access-request/>

What are the time limits?

We will respond to your Subject Access Request as quickly as possible, and as a general rule, no later than one calendar month, starting from the day we receive your request. Please note that this timescale applies to Monday- Friday, term time only. Should a request be submitted outside of school working hours, or in the holidays, we will treat the date of receipt as the next working day after this period. If we need something further from you to be able to validate your request (e.g. ID documents, a letter from you authorising others to act on your behalf), the time limit will begin once this has been received by the school office.

If your request is complex or you make more than one, the response time may be a maximum of three calendar months, (with the same parameters above) starting from the day of receipt. If this is the case, we will inform you of this.

Should a SAR be received close to the end of the retention period (up to and including the day before scheduled date of destruction), the record will be separated out and securely stored in our confidential archive until the SAR has been fulfilled.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 3 years. The policy review will be undertaken by the Data Protection Officer, Head teacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Vicky Cawdeary, Data Protection Officer, who will also act as the contact point for any subject access requests.