



Date: 1 May 2024

Data Protection Policy

INTRODUCTION

We process personal data to deliver education and therefore we are required to meet our legal obligations as set out by the relevant data protection legislation.

This policy explains how we aim to meet these obligations.

SCOPE

This policy applies to all personal data processed by us, regardless of its format. For example hard copy files, digital files, video, audio.

It applies to any person who processes personal data on behalf of the school.

DEFINITIONS

To help you understand our obligations the following definitions are provided:

Data protection legislation means the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 and any other applicable law concerning the processing of personal data and privacy.

Processing means any operation performed on personal data, whether automated or not, such as collection, use, storage, distribution and destruction.

Personal data means any information, which either directly or indirectly, relates to an identified or identifiable individual. Identifiers include name, address, date of birth, unique identification numbers (such as a pupil reference numbers), location data, online identifiers (such as IP addresses), pseudonymised data and information relating to a person's social or economic status.

Special category personal data means personal data consisting of information as to:

- The racial or ethnic origin of the data subject,
- Political opinions,
- Religious beliefs or other beliefs of a similar nature,
- Affiliation with a trade union,
- Physical or mental health or condition,
- Biometric and/or genetic data
- Sex life or sexual orientation

Data subject means the person who can be identified from the data..

Controller means a person or organisation who (either alone or jointly or in common with other

persons) determines the purposes for which, and the manner in which, any personal data is, or is to be, processed. For the purpose of this policy, the school is a Controller.

Processor, means any person or organisation (other than an employee of the school) that processes data on behalf of the Controller.

THE DATA PROTECTION PRINCIPLES

We shall adhere to the six principles of data protection, which are:

- Principle 1: Personal data shall be processed fairly and lawfully and in a transparent manner.
- Principle 2: Personal data shall be collected for specified, explicit and legitimate purposes and shall not be processed in a manner incompatible with that purpose.
- Principle 3: Personal data shall be adequate, relevant and limited to what is necessary for the purpose.
- Principle 4: Personal data shall be accurate and, where necessary, kept up to date.
- Principle 5: Personal data shall not be kept in a form that permits identification for longer than is necessary.
- Principle 6: Personal data shall be processed in a manner that ensures appropriate security.

We shall ensure that we comply with the 'accountability principle' which requires that we have appropriate processes and records in place to demonstrate our compliance with the principles listed above.

DATA PROTECTION ROLES AND RESPONSIBILITIES

The following roles are in place to help us to achieve compliance with data protection legislation:

- The Governing Body has overall responsibility for ensuring the school meets its data protection obligations.
- The Head Teacher has day to day responsibility for ensuring individuals are aware of, and apply, this policy.
- The Data Protection Officer (DPO) will support the school in meeting its obligations and will be the main contact point for data subjects.
- All School staff have a responsibility to meet the requirements of this policy.

We will ensure that all staff are provided with data protection training, support and guidance.

PRIVACY NOTICES

We shall ensure that we provide privacy information to ensure people are informed about the personal data we process about them.

Privacy notices shall be published on our website and, upon request, shall be provided in hard copy, free of charge.

SECURITY

We shall put in place controls to reduce the risk of theft, loss or unlawful processing of personal data.

We will record and investigate all personal data breaches.

Where it is determined that a personal data breach results in a risk to the rights and freedoms of an individual we will aim to report the breach to the Information Commissioner's Office within 72 hours of becoming aware.

Where it is determined that a personal data breach results in a high risk to the rights and freedoms of an individual we will inform the affected data subjects without undue delay.

TRAINING AND AWARENESS

We shall provide mandatory annual data protection training to all staff who handle personal data.

We require all staff to maintain a good awareness of their data protection responsibilities.

SHARING PERSONAL DATA

We shall ensure that whenever we share personal data it is necessary and justified.

We shall ensure that we are clear on our lawful basis before sharing occurs.

CONTRACTS

When a third party delivers services on our behalf and this involves personal data we shall ensure we put in place appropriate safeguards to protect it. This will usually be set out in a contract.

INDIVIDUAL RIGHTS

We shall support data subjects to exercise their rights as set out by data protection legislation.

You have the right to complain to the Information Commissioner's Office (ICO) if you are not satisfied with the way we have handled your personal data.

The ICO is an independent body set up to uphold information rights in the United Kingdom. They can also provide advice and guidance, and can be contacted through their website at www.ico.org.uk, via their helpline on 0303 123 1113, or by writing to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Further Information

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