

**Reviewed: September 2023**

**Review date: September 2024**



## **Fryern Infant and Junior Schools Data Protection Policy**

The school collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) 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.

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 Fryern Federation of Infant and Junior Schools.

The school issues Privacy Notices (also known as a 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

### **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.

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### **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 personal

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### **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:

- Give details of the data controller – Federation of Fryern Infant and Junior Schools, email: [adminoffice@fryern.hants.sch.uk](mailto:adminoffice@fryern.hants.sch.uk) Telephone: 02380254155
- Name the Data Protection Officer for the Federation of Fryern Infant and Junior Schools : Mrs Nicky Board, email [nboard@fryern.net](mailto:nboard@fryern.net) Telephone 02380254155
- Inform individuals of the information collected and the basis for this. Please see the attached data matrix which describes what 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.
- Inform the individual 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

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- Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the school's data protection officer Mrs Nicky Board email: telephone 02380254155
  
- You also have the right, subject to some limitations to:
  - - object to processing of personal data that is likely to cause, or is causing, damage or distress
  - - prevent processing for the purpose of direct marketing
  - - object to decisions being taken by automated means
  - - in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
  - - claim compensation for damages caused by a breach of the Data Protection regulations
  
- 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, this will be in line with Hampshire County Council's record retention policy.
  
- 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.

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- Issue individuals with a data form for them to check and amend their personal data on an annual basis in order to check the accuracy of the records kept.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in. Please see the attached data matrix for authorised personnel.
- 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. Electronic information is password protected and paper information is stored in locked cabinets within the school offices.
- Ensure that personal information is not retained longer than it is needed. Personal information is kept in line with Hampshire County Council's record retention policy.
- Ensure that when information is destroyed that it is done so appropriately and securely. Personal information is either shredded or incinerated on site.
- 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

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- Ensure that all staff and governors are aware of and understand these policies and procedures. GDPR will be an agenda item for staff and Governor meetings.

### **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](http://www.ico.gov.uk)

### **Review**

This policy will be reviewed annually. 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 Mrs Nicky Board [dataprotection@fryern.net](mailto:dataprotection@fryern.net) who will also act as the contact point for any questions.