

# ALDER COPPICE PRIMARY SCHOOL

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*Achievement through Commitment*

## Data Protection Policy

Policy for the Attention of			
<i><b>Audience</b></i>	<i><b>Key Audience</b></i>	<i><b>Optional Audience</b></i>	<i><b>Additional/Notes</b></i>
Senior Leadership Team	✓		
Teachers	✓		
Teaching Assistants	✓		
Administrative Staff	✓		
Curriculum Support	✓		
Lunchtime Supervisors	✓		
Site Manager	✓		
Cleaners	✓		
Governors	✓		
Parents	✓		
Website	✓		
Local Authority		✓	

## Legal Obligations

Recital 74 of the UK General data Protection Regulation (UK GDPR) states that...

*‘The responsibility and liability of the controller for any processing of personal data carried out by the controller or on the controller’s behalf should be established. In particular the controller should be obliged to implement appropriate and effective measures and be able to demonstrate the compliance of processing activities with the Regulation, including the effectiveness of the measures. Those measures should take into account the nature, scope, context and purposes of the processing and the risk to the rights and freedoms of natural persons’.*

To this end, the School and the School’s Governing Board has adopted the policy as specified below.

### Scope

An essential activity within Alder Coppice Primary School is the requirement to gather and process information about its pupils, staff, parents and other individuals who have contact with the School, in order to enable it to provide education and other associated functions.

In addition, there may be a legal requirement to collect and use information to ensure that the School complies with its statutory obligations.

The UK GDPR defines special category information as *‘information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data’.*

Before processing “special category” information Alder Coppice will identify and document the lawful basis for processing this information. The School will only process special categories of personal information in certain situations.

This will be done in accordance with Data Protection Law and other related government legislation.

This policy applies to employees and pupils of Alder Coppice Primary School. It also applies to temporary staff, volunteers and governors working on behalf of the School.

Alder Coppice Primary School and the School’s Governing Board, acting as custodians of personal data, recognize their moral duty to ensure that it is handled properly and confidentially at all times, irrespective of whether it is held on paper or by electronic means. This covers the whole lifecycle, including –

- ❖ The obtaining of personal data;
- ❖ The storage and security of personal data;
- ❖ The use of personal data;
- ❖ The disposal and destruction of personal data.

Alder Coppice Primary School and the School’s Governing Board also has responsibility to ensure that data subjects have appropriate access to details regarding personal information relating to them.

## Objectives

By following and maintaining strict safeguards and controls the School will:

- ❖ Acknowledge the rights of individuals to whom personal data relate, and ensure that these rights may be exercised in accordance with Data Protection Law;
- ❖ Ensure that individuals are fully informed about the collection and use of personal data through the publication of the School's Privacy Notices;
- ❖ Collect and process personal data which is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- ❖ Ensure that adequate steps are taken to ensure the accuracy and currency of data;
- ❖ Ensure that for all personal data, appropriate security measures are taken – both technically and organizationally – to protect against damage, loss or abuse;
- ❖ Ensure that the movement of personal data is done in a lawful way – both inside and outside the organization and that suitable safeguards exist at all times.

## Achieved by

In order to support these objectives the School will:

- ❖ Have a Senior Information Risk Owner (SIRO) to ensure that there is accountability and the Information Risk is recognized at a senior level;
- ❖ Have a designated "Data Protection Officer" (DPO) to meet the School's obligations under Article 37 of UK GDPR;
- ❖ Ensure that all activities that relate to the processing of personal data have appropriate safeguards and controls in place to ensure information security and compliance with the Data Protection Law;
- ❖ Ensure that all contracts and service level agreements between Alder Coppice Primary School and external third parties (including contract staff – where personal data is processed) include the relevant Data Protection clauses and appropriate Organisational and technological measures to safeguard the data;
- ❖ Ensure that all staff (and volunteers) acting on behalf of Alder Coppice Primary School understand their responsibilities regarding information security under the Act, and that they receive the appropriate training and instruction and supervision so that they carry these duties out effectively and consistently and are given access to personal information that is appropriate to the duties they undertake;
- ❖ Ensure that all third parties acting on Alder Coppice's behalf are given access to personal information that is appropriate to the duties they undertake and no more;
- ❖ Ensure that any requests for access to personal data are handled courteously, promptly and appropriately, ensuring that either the data subject or their authorized representative have a legitimate right to access under Data Protection Law, that their request is valid, and that information is clear and unambiguous;
- ❖ Ensure that all staff are aware of the Data Protection Policy and guidance;
- ❖ Review this policy and the safeguards and controls to ensure that they are still relevant, efficient and effective.

The ICO Website provides further detailed guidance on a range of topics including individual's rights, exemptions from the Act, dealing with subject access requests, how to handle requests from third parties for personal data.

### **Further Information**

Data Protection Officer Service  
Dudley MBC,  
3-5 St James's Road,  
Dudley,  
DY1 1HZ

Email: [YourIGDPOService@dudley.gov.uk](mailto:YourIGDPOService@dudley.gov.uk) Tel: 01384 815607