Ysgol y Lawnt

Data Protection Policy

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Author/s:	Caerphilly CBC
Consultee/s:	H/T & School Governing Body
Approved by:	School Governing Body
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Data Protection Policy

1. Policy objective

1.1 Administration and delivery of quality services involves processing personal information about people. The school is committed to managing personal information effectively and legally to maintain confidence between those with whom we deal and the school.

1.2 This policy describes the school's approach to personal information.

2. Scope and definitions

2.1 This policy covers the school's obligations under all legislation applicable in the UK covering data protection and privacy, and references the definitions in the General Data Protection Regulation 2016 (GDPR).

2.2 'Personal Information' is defined as any information relating to an identifiable person who can be directly or indirectly identified. Certain categories of data are subject to additional protections, and includes:

- Criminal allegations, proceedings, outcomes and sentences
- Physical or mental health or condition
- Politics
- Racial or ethnic origin
- Religion or other beliefs of a similar nature
- Sex life
- Sexual orientation
- Trade union membership
- Genetics
- Biometrics (where used for identification purposes)

2.3 'Processing' personal information means any activity involving personal information throughout the information lifecycle, from collecting and creating the personal information, to using it, making it available to others when necessary, storing it, and disposing of it when no longer required.

2.4 The policy applies to all employees, the governing body and other individuals/organisations acting on behalf of the school who have access to personal information that the school is responsible for. Detailed procedures accompany this policy to direct the processing of personal information in a fair, lawful and transparent manner.

3. Data protection principles

3.1 Personal information of all stakeholders – current, former and prospective pupils and their families, employees/volunteers, suppliers and others - will only be processed in compliance with laws on privacy and data protection, specifically adhering to the GDPR principles that personal information must be:

1. processed lawfully, fairly and in a transparent manner;
2. collected for specified, explicit and legitimate purposes;
3. adequate, relevant and limited to what is necessary;
4. accurate and, where necessary, kept up to date;
5. kept in a form which permits identification of data subjects for no longer than necessary; and
6. processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3.2 The school will demonstrate accountability in adhering to the rights of individuals set out in data protection law, including their right:

- to be informed
- of access
- to rectification
- to erasure
- to restrict processing
- to data portability
- to object
- and rights in relation to automated decision making and profiling.

4. Accountability and monitoring

4.1 The Headteacher is the Information Asset Owner for the School, reporting to the Governing Body.

4.2 The school has contracted with Caerphilly County Borough Council to provide a Statutory Data Protection Officer (DPO) to advise on management of personal information.

4.3 Data Protection/Privacy Impact Assessments will be undertaken at an early stage whenever use of personal information is proposed and particularly during new collaborations.

4.4 A record of personal information processing activities is maintained, and the way that the information is managed is regularly evaluated using Data Protection Impact Assessments where appropriate.

4.5 Clear and timely privacy notices are communicated that enable the subject of the data to understand how their personal information is being used.

4.6 Sharing of personal information is carried out in compliance with approved protocols, including the Wales Accord on Sharing Personal Information and data processor agreements.

4.7 Disposal of personal information will be strictly in line with the School's Records Retention and Disposal Procedure.

4.8 Everyone processing personal information understands their responsibilities and receives appropriate information to support them, including annual training.

5. Complaints and data security incidents

5.1 Failure to comply with the law on data protection may result in:

- Serious consequences for individuals that the data relates to, including embarrassment, distress, financial loss
- Irreparable damage to the school's reputation and loss of confidence in the school's ability to manage information properly
- Monetary penalties and compensation claims
- Enforcement action from the Information Commissioner
- Personal accountability for certain criminal offences and for breaching professional codes of conduct.

5.2 Complaints or concerns can be made to the school's Data Protection Officer.

6. Further Information

6.1 Further Information is available on the school website or from the Headteacher Mrs Sharon Davies Pennaeth Ysgol y Lawnt.