Data Protection Policy

The Vyne Community School

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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, Hannah Roberts, who may be contacted at h.roberts@vyne.hants.sch.uk.

The school issues Privacy Notices (also known as Fair Processing Notices) to all pupils, parents, carers, staff, governors, volunteers and visitors. These summarise the personal information held, 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; and
6. personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

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 for 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; and
- ensure that all staff and governors are aware of and understand these policies and procedures.

Complaints

Complaints relating to the handling of personal information will be handled by Hannah Roberts (Data Controller). The school will aim to resolve such complaints, however if individuals are not happy with the school's response then they may raise their concern with the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at https://ico.org.uk/make-a-complaint/

Data Protection Complaints will be managed following the Data protection complaints in schools practical guide.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by the Data Protection Officer, Headteacher, or nominated representative.

Contacts

If you have any enquiries in relation to this policy, please contact the school DPO, Hannah Roberts, h.roberts@vyne.hants.sch.uk who will also act as the contact point for any further information.