



**Crawford Village**  
Primary School & Nursery

*Small enough to care...big enough to inspire*

## ***Data Protection Policy***

## Data Protection Policy for Crawford Village Primary School

### **Our Commitment:**

Crawford Village Primary School & Nursery is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA).

<https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The School Board of Governors is responsible for ensuring that the School complies with the commitments laid out in this policy. The headteacher is charged with operational compliance and will assign any specific staff responsibilities as required in order to help fulfil the School's commitment to effective information management. All members of staff are responsible for creating and maintaining records in accordance with good records management practice.

The school is also committed to ensuring that its staff are aware of data protection policies, legal requirements and adequate training is provided to them.

The requirements of this policy are mandatory for all staff employed by the school and any third party contracted to provide services within the school.

The school Data Protection Officer is Dr Chris Lomas.

### **Definitions:**

**'Data Controller'** means a person 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 will be processed.

**'Data Processor'** in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

**'Processing'** in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:-

- a) organisation, adaptation or alteration of the information or data,
- b) retrieval, consultation or use of the information or data,
- c) disclosure of the information or data by transmission, dissemination or otherwise making available, or erasure or destruction of the information or data

## **Notification:**

Our data processing activities will be registered with the Information Commissioner's Office (ICO) as required of a recognised Data Controller. Details are available from the ICO:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Changes to the type of data processing activities being undertaken shall be notified to the ICO and details amended in the register.

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

## **Personal and Sensitive Data:**

All data within the school's control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates. All sensitive information that is sent by email will be sent via the Lancashire County Council secure email system

The definitions of personal and sensitive data shall be as those published by the ICO for guidance:

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act and General Data Protection Regulations shall be applied to all data processed:

1. Processed fairly and lawfully
2. Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes
3. Accurate and, where necessary, kept up to date,
4. Adequate, relevant and not excessive in relation to the purposes for which it is processed
5. Not kept for longer than is necessary for those purposes
6. Processed in accordance with the rights of data subjects
7. Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
8. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

## **Fair Processing / Privacy Notice:**

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, parents and pupils prior to the processing of individual's data.

Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation.

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control/>

The intention to share data relating to individuals to an organisation outside of our school shall be clearly defined within notifications and details of the basis for sharing given. Data will also be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

There shall be no automated decision making based on the data held about an individual.

## **Data Security:**

In order to ensure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them. Any risks found from the personal data auditing process will be put into a risk register.

Risk and impact assessments shall be conducted in accordance with guidance given by the ICO:

- <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>
- <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>
- <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2014/02/privacy-impact-assessments-code-published/>

Security of data shall be achieved through the implementation of proportionate physical and technical measures. Computer hardware and other IT devices which hold data will be password-protected. Nominated staff shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data. The school adopts a culture of professionalism and understanding amongst staff that information should only be shared if there is demonstrable need.

## **Data Access Requests (Subject Access Requests):**

All individuals whose data is held by us, has a legal right to request access to such data or information about what is held. We shall respond to such requests within one month and they should be made in writing to:

Mrs D Eaton  
Crawford Village Primary School  
Crawford Road  
Crawford Village  
WN8 9QU

- [https://ico.org.uk/media/for-organisations/documents/1586/personal\\_information\\_online\\_small\\_business\\_checklist.pdf](https://ico.org.uk/media/for-organisations/documents/1586/personal_information_online_small_business_checklist.pdf)
- <https://ico.org.uk/media/for-organisations/documents/1235/definition-document-schools-in-england.pdf>

## **Photographs and Video:**

Images of staff and pupils may be captured at appropriate times and as part of educational activities for use by school only.

Unless prior consent from parents/pupils/staff has been given, the school shall not utilise such images for public marketing or publicity.

It is the school's policy that external parties (including parents) may not capture images of staff or pupils during such activities without prior consent. When this consent is given, such images should be for private use only and should not be made public, including sharing on social media.

## **Information Sharing:**

Where data is shared with 3<sup>rd</sup> parties, these will be notified to the parties in the relevant Privacy Notice, including which information is shared and the purpose for which it is shared.

The data protection policies of the receiving party must meet the same standards as the school or higher to ensure the data is stored and processed safely.

The school will maintain a register of its regular 3<sup>rd</sup> party suppliers who process data on behalf of the school and record that data protection compliance has been sought and evidenced.

In exceptional circumstances the school will share data with statutory bodies for the safeguarding and welfare of young people and adults in its care, which may not be specifically notified in the Privacy Notice.

## **Recording Information**

Information about different individuals will be recorded separately.

Information, in whatever form, will be stored securely in accordance with data protection legislation and only available to authorised individuals as indicated in the appropriate Data Processing Chart.

All reasonable steps will be taken to ensure safe receipt of information.

## **Data Retention and Disposal:**

The school will maintain a Data Retention Schedule which outlines the categories of information it holds and the period for which each shall be retained.

The school recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data held in any form of electronic or digital media shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services. All paper records shall be shredded and securely disposed of after their agreed period of storage.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance. The school has identified a qualified source for disposal of IT assets and collections. Details can be found here:

ABtec Education  
Unit 8, Armstrong Point,  
Swan Lane  
Hindley Green  
Wigan WN2 4AU