

All Saints' CE Primary School



Data Protection Policy

Approved: March 2019

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Author: R Sugden / V Wood



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Rational

Our school aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill.

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Members of staff will gain familiarisation with the requirements of the GDPR either in a staff briefing or as part of their induction.

This policy follows guidance issued by the Information Commissioner's Office (ICO) and the Department for Education (DfE). The school is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

The school is a Data Controller as data is processed that is the personal information of pupils, families, staff, visitors and other school users. The School is a Data Processor as it processes data on behalf of other public bodies such as the DfE.

This policy also reflects the ICO's code of practice for the use of surveillance cameras and personal information. In addition, this policy complies with regulation 5 of the Education (Pupil Information) (England) Regulations 2005, which gives parents the right of access to their child's educational record.

Definitions

Term	Definition
Personal data	<p>Any information relating to an identified, or identifiable, individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none"> • Name (including initials) • Identification number • Location data • Online identifier, such as a username <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>
Special categories of personal data	<p>Personal data which is more sensitive and so needs more protection, including information about an individual's:</p> <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetics • Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes • Health – physical or mental • Sex life or sexual orientation



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Data Processing	Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
Data subject	The identified or identifiable individual whose personal data is held or processed.

Data controller	A person or organisation that determines the purposes and the means of processing of personal data.
Data processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
Personal data breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.
Consent	Must be freely given, specific and an unambiguous indication of the subject's wishes. It must be recorded and available to an audit. A person must be 13 years old in order to record their consent.
Cross-border processing	The GDPR covers all EU states and will remain part of UK law. Data cannot be stored beyond the EU and UK borders (the exact borders are those of the European Economic Area)
Subject Access Request	Data subjects (or a child's parents) may request access to a copy of all their data. The school has established an efficient means of accomplishing this task which may not carry a charge and will be completed within 15 working days. Data subjects may request that data is brought up-to-date or made more accurate.
Legal Basis	The school decides, and registers with the ICO, upon which legal basis it processes data. As a public body with set duties the school uses the following bases for processing and controlling data: Legal basis: Public Task <ul style="list-style-type: none"> • Admissions • Attendance • Assessment • Pupil and staff welfare • Safe recruitment • Staff training • Performance Management Legal basis: Consent <ul style="list-style-type: none"> • Various uses of photographs and moving images • Trade union membership • Staff ethnicity, religion and health data (Note the Staff Privacy Statement) • The use of data to promote the social life of the school community Legal basis: Contract <ul style="list-style-type: none"> • When processing is required to carry out the performance of a contract

Roles and responsibilities

This policy applies to all staff employed by our school, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

The school's Privacy Statements set out in detail how the school will maintain the security of school users' data. The Acceptable Use Policies set out the duties of the staff and other school users in supporting data security.

Governing board



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The governing board has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

Data Protection Officer

The school has appointed a Data Protection Officer who has responsibility for overseeing the implementation of this policy and all GDPR related documents. The DPO will monitor compliance, report to the school leadership and support the school with updates and interpretations as the GDPR develops.

The DPO will liaise between the school and the ICO and must be informed as soon as is practicable of any personal data security breach.

The DPO will support the school in its communication with school users (pupils, families, parents, governors, contractors and visitors) about the school's GDPR procedures. This will include the drafting of privacy statements, acceptable use policies and data subjects' rights.

Data subject requests should be made in writing to the DPO.

The school's DPO is:

*Claire Lockyer of Impero, Edaware (previously Safeguarding Monitor Ltd)
Oak House, Mere Way, Ruddington Fields Business Park, Ruddington, Nottingham, NG11 6JS
clockyer@imperosoftware.com
03304 004 142*

The DPO's duties are set out in greater detail in the service level agreement and contract held between the school and Safeguarding Monitor. Staff should contact the DPO should they believe that this policy and/or the privacy statements and/or the acceptable use policies are not being followed.

Headteacher

The Headteacher acts as the representative of the data controller on a day-to-day basis.

All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the school of any changes to their personal data, such as a change of address
- Contacting the DPO in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - If they have any concerns that this policy is not being followed
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
 - If they need help with any contracts or sharing personal data with third parties



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Data protection principles

The GDPR is based on data protection principles that our school must comply with.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date

- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how the school aims to comply with these principles.

Collecting personal data

Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked the school to take specific steps before entering into a contract
- The data needs to be processed so that the school can **comply with a legal obligation**
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone's life
- The data needs to be processed so that the school, as a public authority, can perform a task **in the public interest**, and carry out its official functions
- The data needs to be processed for the **legitimate interests** of the school or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.

If we offer online services to pupils, such as classroom apps, and we intend to rely on consent as a basis for processing, we will get parental consent (except for online counselling and preventive services).

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.



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If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs.

When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the Information and Records Management Society's toolkit for schools.

Sharing personal data

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies, payroll provider etc. When doing this, we will:
 - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law
 - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share
 - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Subject access requests and other rights of individuals

Subject access requests

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed



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- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

Subject access requests must be submitted in writing, either by letter, or email to the DPO. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

If staff receive a subject access request they must immediately forward it to the DPO.

Children and subject access requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

Responding to subject access requests

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month and explain why the extension is necessary.

We will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child



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If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

Other data protection rights of the individual

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it, individuals also have the right to:

- Withdraw their consent to processing at any time
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement that might negatively affect them)
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

Parental requests to see the educational record

Parents, or those with parental responsibility, have a legal right to free access to their child's educational record (which includes most information about a pupil) within 15 school days of receipt of a written request.

CCTV

CCTV is used to support the safety and security of school users. We adhere to the ICO's code of practice* for its use. Although consent is not required for its use prominent notices inform school users that CCTV is used within the school site.

** In the picture: A data protection code of practice for surveillance cameras and personal information*

Photographs and videos

As part of our school activities, we may take photographs and record images of individuals within our school.

We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to the parent/carer.



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Uses may include:

- Within school on notice boards and in school magazines, brochures, newsletters, etc.
- Outside of school by external agencies such as the school photographer, newspapers, campaigns
- Online on our school website

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified, unless we have consent to do so.

Data protection by design and default

We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified DPO.
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law
- Completing privacy impact assessments where the school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process)
- Integrating data protection into internal documents including this policy, any related policies and privacy notices
- Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters.
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant under guidance from our DPO.
- Maintaining records of our processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of our school and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)
 - For all personal data that we hold, maintaining an internal record of the type of data, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure

Data security and storage of records

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use



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- Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access
- Where personal information needs to be taken off site, staff must sign it in and out from the school office
- Secure passwords are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Staff, pupils or governors must not store personal information on their personal devices
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected

Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the school's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

Personal data breaches

The school will make all reasonable endeavours to ensure that there are no personal data breaches. In the unlikely event of a suspected data breach, we will follow the procedure set out in appendix 1.

When appropriate, we will report the data breach to the ICO within 72 hours. Such breaches in a school context may include, but are not limited to:

- A non-anonymised dataset being published on the school website which shows the exam results of pupils eligible for the pupil premium
- Safeguarding information being made available to an unauthorised person
- The theft of a school laptop containing non-encrypted personal data about pupils

Training

All staff and governors are provided with data protection training.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy.

This policy will be reviewed every 2 years and shared with the Full Governing Body.

Links with other policies

This data protection policy is linked to our:



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- Freedom of information publication scheme
- Retention Policy
- Acceptable Use Policy
- Staff Conduct Policy
- Child Protection and Safeguarding Policy

Appendix 1: Personal Data Breach Procedure

This procedure is based on guidance on personal data breaches produced by the ICO.

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the Head teacher, who will notify the DPO
- The DPO will investigate the report, and determine whether a breach has occurred. To decide, the DPO will consider whether personal data has been accidentally or unlawfully:
 - Lost
 - Stolen
 - Destroyed
 - Altered
 - Disclosed or made available where it should not have been
 - Made available to unauthorised people
- The DPO will alert the Chair of Governors
- The DPO will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary. (Actions relevant to specific data types are set out at the end of this procedure)
- The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The DPO will work out whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the DPO will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
 - Loss of control over their data



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- Discrimination
- Identify theft or fraud
- Financial loss
- Unauthorised reversal of pseudonymisation (for example, key-coding)
- Damage to reputation
- Loss of confidentiality
- Any other significant economic or social disadvantage to the individual(s) concerned

If it's likely that there will be a risk to people's rights and freedoms, the DPO must notify the ICO.

- The DPO will document the decision (either way), in case it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored on the school's computer system and a copy is retained by the DPO.
- Where the ICO must be notified, the DPO will do this via the 'report a breach' page of the
- ICO website within 72 hours. As required, the DPO will set out:
 - A description of the nature of the personal data breach including, where possible:
 - The categories and approximate number of individuals concerned
 - The categories and approximate number of personal data records concerned
 - The name and contact details of the DPO
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours. The report will explain that there is a delay, the reasons why and when the DPO expects to have further information. The DPO will submit the remaining information as soon as possible
- The DPO will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact. If the risk is high, the DPO will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out:
 - The name and contact details of the DPO
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
- The DPO will notify any relevant third parties who can help mitigate the loss to individuals - for example, the police, insurers, banks or credit card companies
- The DPO will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
 - Facts and cause
 - Effects
 - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored on the school's computer system and the DPO's computer system. The DPO and Headteacher will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible.



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Actions to minimise the impact of data breaches

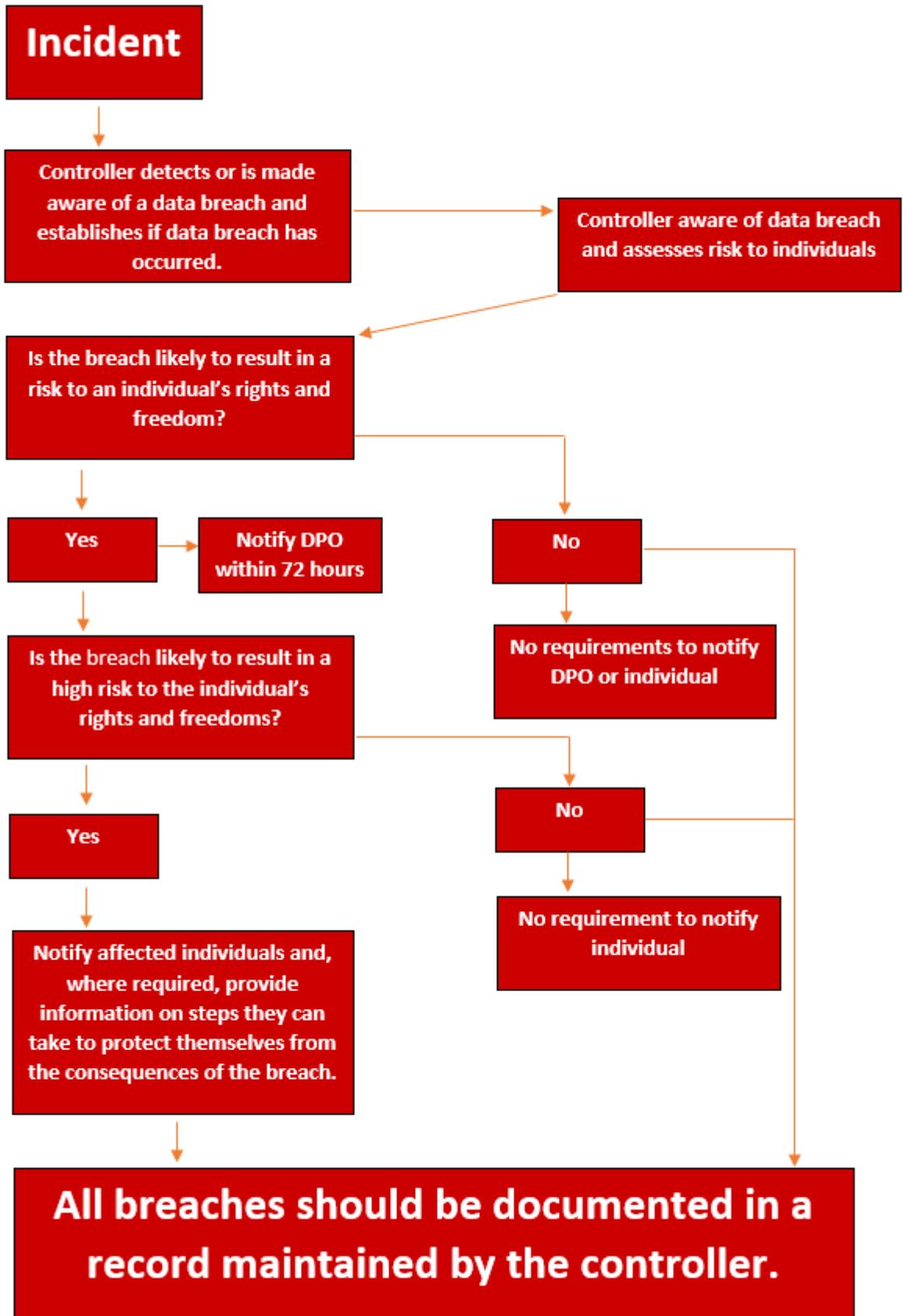
We will take the actions set out below to mitigate the impact of different types of data breach, focusing especially on breaches involving particularly risky or sensitive information. We will review the effectiveness of these actions and amend them as necessary after any data breach.

For example:

Sensitive information being disclosed via email (including safeguarding records)

- If special category data (sensitive information) is accidentally made available via email to unauthorised individuals, the sender must attempt to recall the email as soon as they become aware of the error
- Members of staff who receive personal data sent in error must alert the sender and the DPO, via the Headteacher, as soon as they become aware of the error
- If the sender is unavailable or cannot recall the email for any reason, the DPO will ask the ICT department to recall it
- In any cases where the recall is unsuccessful, the DPO will contact the relevant unauthorised individuals who received the email, explain that the information was sent in error, and request that those individuals delete the information and do not share, publish, save or replicate it in any way
- The DPO will ensure we receive a written response from all the individuals who received the data, confirming that they have complied with this request
- The DPO will carry out an internet search to check that the information has not been made public; if it has, we will contact the publisher/website owner or administrator to request that the information is removed from their website and deleted

Data Breach Flowchart





Appendix A: Freedom of Information Policy

Publication Scheme on information available under the Freedom of Information Act 2000

The governing body is responsible for maintenance of this scheme.

1. Introduction: what a publication scheme is and why it has been developed

One of the aims of the Freedom of Information Act 2000 (which is referred to as FOIA in the rest of this document) is that public authorities, including all maintained schools, should be clear and proactive about the information they will make public.

To do this we must produce a publication scheme, setting out:

- *The classes of information which we publish or intend to publish;*
- *The manner in which the information will be published;*
- *Whether the information is available free of charge or on payment.*

The scheme covers information already published and information which is to be published in the future. All information in our publication scheme is available in paper form.

Some information which we hold may not be made public, for example personal information.

This publication scheme conforms to the model scheme for schools approved by the Information Commissioner.

2. Aims of the School

The school aims to:

- Enable every child to fulfil their learning potential, with education that meets the needs of each child,
- Help every child develop the skills, knowledge and personal qualities needed for life and work,

And this publication scheme is a means of showing how we are pursuing these aims.

3. Categories of information published

The publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'. These are contained in Section 6 of this scheme.

The classes of information that we undertake to make available are organized into four broad topic areas:

School Prospectus – information published in the school prospectus.

Governors' Documents – information regarding governing body documents.

Pupils & Curriculum – information about policies that relate to pupils and the school curriculum.

School Policies and other information related to the school – information about policies that relate to the school in general.



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4. How to request information

If you require a paper version of any of the documents within the scheme, please contact the school by any of the following methods:

Telephone: 01943 607852

Fax: 01943 432074

Email: office@allsaintsilkeley.bradford.sch.uk

Letter: All Saints' C of E Primary School, Easby Drive, Ilkley, LS29 9BE.

To help us process your request quickly, please clearly mark any correspondence "PUBLICATION SCHEME REQUEST" (in CAPITALS please).

If the information you are looking for is not available via the scheme you can still contact the school to ask if we have it.

5. Paying for information

Single copies of information covered by this publication are provided free unless stated otherwise in Section 6. If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or videos, we will let you know the cost before fulfilling your request. Where there is a charge this will be indicated by a £ sign in the description box.

6. Classes of Information Currently Published

School Prospectus – this section sets out information published in the school prospectus.

Class	Description
School Prospectus	<p>The statutory contents of the school prospectus are as follows, (other items may be included in the prospectus at the school's discretion):</p> <ul style="list-style-type: none"> ▪ The name, address and telephone number of the school, and the type of school ▪ The names of the head teacher and chair of governors ▪ Information on the school policy on admissions ▪ A statement of the school's ethos and values ▪ Details of any affiliations with a particular religion or religious denomination, the religious education provided, parents' right to withdraw their child from religious education and collective worship and the alternative provision for those pupils ▪ Information about the school's policy on providing for pupils with special educational needs ▪ Number of pupils on roll and rates of pupils' authorized and unauthorized absences ▪ National Curriculum assessment results for appropriate Key Stages, with national summary figures ▪ The arrangements for visits to the school by prospective parents



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Information relating to the governing body

Class	Description
Instrument of Government	<ul style="list-style-type: none"> ▪ The name of the school ▪ The category of the school ▪ The name of the governing body ▪ The manner in which the governing body is constituted ▪ The term of office of each category of governor if less than 4 years ▪ The name of any body entitled to appoint any category of governor ▪ Details of any trust ▪ If the school has a religious character, a description of the ethos ▪ The date the instrument takes effect
Minutes ¹ of meetings of governing body and its committees	Agreed minutes of meetings of the governing body and its committees. These may also be posted on the Governors section of the school's website.

Pupils & Curriculum Policies – This section gives access to information about policies that relate to pupils and the school curriculum.

Class	Description
Home-school agreement	Statement of the school's aims and values, the school's responsibilities, the parental responsibilities and the school's expectations of its pupils for example homework arrangements
Curriculum Policy	Statement on following the policy for the secular curriculum subjects and religious education and schemes of work and syllabuses currently used by the school
Relationships & Sex Education Policy	Statement of policy with regard to sex and relationship education
Special Education Needs Policy	Information about the school's policy on providing for pupils with special educational needs
Accessibility Plans	Plan for increasing participation of disabled pupils in the school's curriculum, improving the accessibility of the physical environment and improving delivery of information to disabled pupils
Race Equality Policy	Statement of policy for promoting race equality
Collective Worship	Statement of arrangements for the required daily act of collective worship
Child Protection Policy	Statement of policy for safeguarding and promoting welfare of pupils at the school (from March 2004)
Pupil Discipline	Statement of general principles on behaviour and discipline and of measures taken by the head teacher to prevent bullying

School Policies and other information related to the school – This section gives access to information about policies that relate to the school in general.

Class	Description
Published reports of OFSTED referring expressly to the school	Published report of the last inspection of the school and the summary of the report and where appropriate inspection reports of religious education in those schools designated as having a religious character

¹ Some information might be confidential or otherwise exempt from the publication by law – we cannot therefore publish this.



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Post-OFSTED inspection action plan	A plan setting out the actions required following the last OFSTED inspection and where appropriate an action plan following inspection of religious education where the school is designated as having a religious character
Charging and Remissions Policies	A statement of the school's policy with respect to charges and remissions for any optional extra or board and lodging for which charges are permitted, for example school publications, music tuition, trips
School session times and term dates	Details of school session and dates of school terms and holidays
Health and Safety Policy and risk assessment	Statement of general policy with respect to health and safety at work of employees (and others) and the organization and arrangements for carrying out the policy
Complaints procedure	Statement of procedures for dealing with complaints
Performance Management of Staff	Statement of procedures adopted by the governing body relating to the performance management of staff and the annual report of the head teacher on the effectiveness of appraisal procedures
Staff Conduct, Discipline and Grievance	Statement of procedure for regulating conduct and discipline of school staff and procedures by which staff may seek redress for grievance
Curriculum circulars and statutory instruments	Any statutory instruments, departmental circulars and administrative memoranda sent by the Department of Education and Skills to the head teacher or governing body relating to the curriculum
Annexe A – Other documents	Annexe A provides a list of other documents that are held by the school and are available on request

7. Feedback and Complaints

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint then initially this should be addressed to the Headteacher at the school address.

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner's Office. This is the organization that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints. They can be contacted at:

Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Or Enquiry/Information Line: 01625 545 700
 Email: publications@ic-foi.demon.co.uk
 Website: www.ico.gov.uk



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Freedom of Information Publication Scheme
Annexe A – Further documents held by the school

NAME OF DOCUMENT	DESCRIPTION
Aims of the School	Summary of the ethos and aims
Curriculum Statement	Values underpinning the Curriculum together with purpose, general principles and aims for the various subjects
Policies	
Literacy	Rationale, aims and guidelines for teaching the various aspects of the English curriculum
ICT (including Internet Access)	Rationale, aims and guidelines for teaching ICT across the curriculum, plus management of access to the internet in school
Numeracy	Rationale, aims and guidelines for teaching mathematics throughout the school
Religious Education	Rationale, aims and topic cycle
Science	Rationale, aims and objectives for the teaching and learning of Science plus topic cycle and record sheet
Creative Arts Policy	Rationale, aims and teaching and learning for Art, Dance and Drama
Design & Technology	Policy statement for the delivery of Design and Technology
French	Rationale, attainment, teaching and learning approach for French
Geography	Rationale, principals of teaching and learning, aims and strategies for teaching Geography with Topic Cycle
History	Rationale, principals of teaching and learning, aims and strategies for teaching History with Topic Cycle and list of resources
Music	Rationale, aims, programmes of study and topic cycle, with list of resources
Physical Education	Aims, guidance, health and safety policy, NC attainment targets, example record sheets, schedule of areas concerning KS1 and KS2
PSHE [Personal, Social, and Health Education Policy (including Drugs)]	Rationale, aims, objectives and appropriate teaching
Citizenship	Rationale, aims, objectives, guidelines and teaching and learning strategies with learning outcomes
Relationships and Sex	Rationale, aims, objectives and guidelines with statutory National Curriculum information
Special Educational Needs	Rationale, aims, objectives, inclusion, explanation of roles and partnerships, allocation of resources, assessment and access to the curriculum
Teaching & Learning	Rationale, aims, objectives, effective teaching and learning, role of governors and parents
Gifted & Talented	Rationale, aims and objectives, identification, aptitudes, teaching and learning style and management strategies
Administration of Medicine	Rationale, identification of essential and non-essential medication and how these will be dealt with
Admissions	Admission arrangements



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Assessment	Rationale, aims, objectives, planning, recording, reporting, feedback and programme of assessment
Attendance	Rationale, procedures and instructions
Charging	Rationale, aims, policies for school trips/visits, practical subjects, books, music tuition, swimming
Child Protection	Rationale, aims, categories, signs, prevention and procedures
Collective Worship	Aims, provision, resources and parental rights
CRB Policy and Procedures	Enhanced Disclosure, new appointments, procedures in school, agency, peripatetic and contractors staff. Guidance on selection and screening processes.
Educational Visits	Safety for educational visits and journeys – rationale, aim, types, planning procedures, organization and safety
Equal Opportunities	Rationale, aims, gender, race, special educational needs, staffing with report form
Foundation Stage	Introduction, play, aims, teaching and learning style, inclusion, curriculum, assessment, role of parents and resources
Freedom of Information	Introduction, aims and objectives, categories of information published, how to request information
Home- School Agreement	Key Stage 1 and Key Stage 2
Homework	Rationale, aims, role of school and parents/guardians
Education of Looked After Children	Introduction, roles and responsibilities of designated teacher, of all staff and of the governing body, training
Marking	Aims, Writing, Maths and General instructions
Non-Smoking	Rationale, aims, objectives, organization
Parental Complaints	Rationale, informal stage, formal stage
Pastoral Care Worker	Rationale, aims, role of Pastoral Care Worker
Road Safety	Rationale, aims, guidelines and other information
School Travel Plan	Location, travel patterns, traffic problems, safety issues, aim, strategies and implementation
Target Setting	Rationale, aims, objectives, process and data necessary to set targets across the curriculum, with termly monitoring guide sheets
Whole School Positive Behaviour	Aims, objectives, rules, positive aims, sanctions plus Whole School Anti-Bullying Policy with report form and Exclusions Policy
Whole School Policy for Self-Evaluation, Monitoring and Review	Rationale, aims, self-review cycle, roles and responsibilities
Discipline, Grievance and Capability Procedures	Disciplinary Procedures – General Principles, Levels of Action, appendices
Staff Behaviour Policy relating to Harassment & Bullying	Definition, legal responsibilities, school policy and procedures



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Health & Safety	Rationale, allocation of duties and responsibilities, procedures. Health & Safety in School Grounds Policy
Pay Policy	General statement, procedures, payment and allowances for all groups of staff in school
Performance Management	Rationale, roles, responsibilities, reviews, cycles, links, Leadership Group, management, confidentiality, access to outcomes, complaints, evaluation
Race Relations	Rationale, commitment, roles, implementation, monitoring and assessing, plus complaints procedure
Recruitment & Selection	Advertising, interviewing, appointing plus appendices
Staff Development	Rationale, aims, identification of needs, provision, recording and dissemination, funding and role of co-ordinator
Well Being and Stress Management	Aims, strategies, supportive measures, review



Appendix B: GDPR Compliance Policy

Introduction

Purpose

The school is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. This policy sets out the school's commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of job applicants, employees, workers, contractors, volunteers, interns, apprentices and former employees, referred to as HR-related personal data. This policy does not apply to the personal data of pupils or other personal data processed for business purposes.

The school has appointed a Data Protection Officer (DPO):

*Adrian Stygall of Safeguarding Monitor Ltd
2 Wellington Place, Leeds, LS1 4DL
adrian@safeguardingmonitor.co.uk
03304 004 142
07711 88 4759*

Their role is to inform and advise the school on its data protection obligations. Questions about this policy, or requests for further information, should be directed to the DPO.

Definitions

"Personal data" is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means 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 biometric data.

"Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

Data protection principles

The school processes HR-related personal data in accordance with the following data protection principles:

- The school processes personal data lawfully, fairly and in a transparent manner.
- The school collects personal data only for specified, explicit and legitimate purposes.
- The school processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.



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- The school keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- The school keeps personal data only for the period necessary for processing.
- The school adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

The school tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons.

Where the school processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with a policy on special categories of data and criminal records data.

The school will update HR-related personal data promptly if an individual advises that his/her information has changed or is inaccurate.

Personal data gathered during the [employment, worker, contractor or volunteer relationship, or apprenticeship or internship] is held in the individual's personnel file (in hard copy or electronic format, or both), and on HR systems. The periods for which the school holds HR-related personal data are contained in its privacy notices to individuals.

The school keeps a record of its processing activities in respect of HR-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

Special category data

All Saints' C of E Primary School holds special category data as detailed below:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sex life
- sexual orientation

Individual rights

As a data subject, individuals have a number of rights in relation to their personal data.

Subject access requests

Individuals have the right to make a subject access request. If an individual makes a subject access request, the school will tell him/her:

- whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long his/her personal data is stored (or how that period is decided);



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- his/her rights to rectification or erasure of data, or to restrict or object to processing;
- his/her right to complain to the Information Commissioner if he/she thinks the school has failed to comply with his/her data protection rights; and
- whether or not the school carries out automated decision-making and the logic involved in any such decision-making.

The school will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

If the individual wants additional copies, the school will charge a fee, which will be based on the administrative cost to the school of providing the additional copies.

To make a subject access request, the individual should send the request to dpo@allsaintsilkeley.bradford.sch.uk. In some cases, the school may need to ask for proof of identification before the request can be processed. The school will inform the individual if it needs to verify his/her identity and the documents it requires.

The school will normally respond to a request within a period of one month from the date it is received. In some cases, such as where the school processes large amounts of the individual's data, it may respond within three months of the date the request is received. The school will write to the individual within one month of receiving the original request to tell him/her if this is the case.

If a subject access request is manifestly unfounded or excessive, the school is not obliged to comply with it. Alternatively, the school can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the school has already responded. If an individual submits a request that is unfounded or excessive, the school will notify him/her that this is the case and whether or not it will respond to it.

Other rights

Individuals have a number of other rights in relation to their personal data. They can require the school to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if the individual's interests override the school's legitimate grounds for processing data (where the school relies on its legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override the school's legitimate grounds for processing data.

To ask the school to take any of these steps, the individual should send the request to:
dpo@allsaintsilkeley.bradford.sch.uk

Data security

The school takes the security of HR-related personal data seriously. The school has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties. [Provide more detail of internal policies and controls, e.g. systems restrictions and data security policy.]

Where the school engages third parties to process personal data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and school measures to ensure the security of data.



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Impact assessments

Some of the processing that the school carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, the school will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

Data breaches

If the school discovers that there has been a breach of HR-related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. The school will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

International data transfers

The school will not transfer HR-related personal data to countries outside the EEA.

Individual responsibilities

Individuals are responsible for helping the school keep their personal data up to date. Individuals should let the school know if data provided to the school changes, for example if an individual moves house or changes his/her bank details.

Individuals may have access to the personal data of other individuals [and of our customers and clients] in the course of their [employment, contract, volunteer period, internship or apprenticeship]. Where this is the case, the school relies on individuals to help meet its data protection obligations to staff [and to customers and clients].

Individuals who have access to personal data are required:

- to access only data which they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the school) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the school's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under the school's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

Training

The school will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.



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Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

Further Information

This policy should be read in conjunction with the Data Protection Policy, Freedom of Information Policy, and E-Safety Policy (including Acceptable Use Policy).