



## **Data Protection Policy**

Policy Code:	HR6
Policy Start Date:	February 2013
Policy Review Date:	February 2016

Please read this policy in conjunction with the policies listed below:

- HR12 Disciplinary Procedure
- Freedom of Information Statement
- HR5 Acceptable Use Policy



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**1 Policy Statement**

- 1.1 This policy applies to all employees and agents of The Priory Federation of Academies, and to contractors, suppliers and consultants employed by the Federation, insofar as they may collect, hold, access or dispose of personal data relating to the business of the Academy.
- 1.2 The provisions of this policy extend to personal data held on any personal computers or personal organisers, or in structured manual files, even if not owned by The Priory Federation of Academies, when used by members of staff, or external contractors and advisors, specifically to support the business activities of the Federation (e.g. use of palm tops or home PCs by staff for business purposes).
- 1.3 Any breach of the Data Protection Act of 1998 or The Priory Federation of Academies Data Protection Policy will be considered misconduct and, in that event, the Federation's Disciplinary Procedure will be applied.

**2 Responsibility and Implementation**

- 2.1 It is the responsibility of all employees to adhere to this policy. The implementation of this policy on an operational level is the responsibility of the Human Resources Manager.
- 2.2 It is the responsibility of all staff to ensure that Academy records are as accurate and up-to-date as possible, ensuring changes to personal data are promptly reported to the Data Teams to allow the Academies' Management Information System (MIS), to be maintained at all times.

**3 Policy Details**

**3.1 Introduction**

Each Academy collects and uses certain types of personal information (data) about, staff, students, parents and other individuals who come into contact with the school in order to provide learning and teaching and other associated functions. In addition, it may be required by law to collect and use certain types of information to comply with statutory obligations of Local Authorities, government agencies and other bodies.

This policy is intended to ensure that personal information must be dealt with properly and securely and in accordance with the Data Protection Acts 1998 and 2003, plus any subsequent amendments



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and other related legislation. It will apply to information regardless of the way it is used, recorded and stored and whether it is held in paper files or electronically.

### **3.2 Data Protection Principles**

There are eight Data Protection Principles laid down in the Data Protection Act 1998 which must be followed at all times:

- i. Data must be processed fairly and lawfully.
- ii. Personal data shall be obtained only for one or more specific and lawful purposes.
- iii. Personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
- iv. Personal data shall be accurate and where necessary kept up to date.
- v. Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose.
- vi. Personal data shall be processed in accordance with the rights of data subjects under the 1998 Data Protection Act.
- vii. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- viii. Personal data shall not be transferred to a country outside the EEA, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **3.3 Federation Commitment**

The Federation is committed to maintaining the data protection principles at all times. This means that the Federation will:

- Tell you what purposes we will use information for when we collect it.
- If information will be shared we will tell you why, with whom and under what circumstances.
- Check the quality and accuracy of the information we hold.
- Apply our records management policies and procedures to ensure that information is not held longer than is necessary.
- Ensure that when information is authorised for disposal it is done appropriately.



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- Ensure appropriate security measures to safeguard personal information whether it is held in paper files or on our computer system.
- Share personal information with others only when it is necessary and legally appropriate to do so.
- Set out clear procedures for responding to requests for access to personal information.
- Train our staff so that they are aware of our policies and procedures.

This policy will be updated as necessary to reflect best practice or amendments made to the Data Protection Acts 1998 & 2003.

#### **4 Procedures**

This procedure may only be amended or withdrawn by The Priory Federation of Academies Trust.



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## **The Priory Federation of Academies Trust Data Protection Policy**

This Policy has been approved by the Priory Federation of Academies Trust's Pay, Performance and HR Committee:

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human Resources.