



Data Protection Policy

Policy Code:	HR6
Policy Start Date:	September 2016
Policy Review Date:	September 2019

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

- HR5 Acceptable Use (ICT) Policy
- HR12 Staff Disciplinary Policy.
- SW5 Safeguarding and Child Protection (Promoting Students Welfare) Policy.



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1 Policy Statement

- 1.1** This policy applies to all employees and agents of The Priory Federation of Academies Trust (the Trust), and to contractors, suppliers and consultants employed by the Trust, insofar as they may collect, hold, access or dispose of personal data relating to the business of the Trust.
- 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 Trust, when used by members of staff, or external contractors and advisors, specifically to support the business activities of the Trust (e.g. smart phones, tablets, laptops or home PCs by staff for business purposes).
- 1.3** Any breach of the Data Protection Act of 1998 or the Trust's Data Protection Policy will be considered misconduct and, in that event, the Trust'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 Head of Human Resources.
- 2.2** It is the responsibility of all staff to ensure that all 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.
- 2.3** It is the responsibility of all staff to manage their own security by keeping passwords secure and ensuring others do not use their credentials. Any security concerns must be reported to IT support services.

3 Policy Details

3.1 Introduction

The Trust collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the school complies with its statutory obligations.

Schools have a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the information held



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and its use. These details are then available on the ICO's website. Schools also have a duty to issue a Fair Processing Notice to all pupils/parents; this summarises the information held on pupils, why it is held and the other parties to whom it may be passed on.

3.2 Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

3.3 What is Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

3.4 Data Protection Principles

The Data Protection Act 1998 establishes eight enforceable principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for one or more specified and lawful purposes;
3. Personal data shall be adequate, relevant and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998;
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security;
8. 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.



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3.5 General Statement

The Trust is committed to maintaining the above principles in all its academies at all times. Therefore the academies will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Ensure that when entering into an agreement with a “cloud” service provider who will be holding or processing personal data, we will be satisfied that the provider is carrying out its data processing for the personal data in accordance with the Data Protection Act 1998
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
- Ensure our staff are aware of and understand our policies and procedures.

4 Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator).

5 Policy change

This policy 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.