

Wye Forest Federation

Redbrook Church of England Primary School
St Briavels Parochial Church of England Primary School



Name of Policy: Data Protection

This policy was agreed by the Full Governing Body on: (and supersedes all previous policies relating to this area)	28.9.2023
Implemented:	1.9.2023
Updated	21.11.2024
Review date:	1.9.2025

Wye Forest Federation collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the schools in the Federation. This information is gathered in order to enable it to provide education and the associated functions of the schools. In addition, there may be a legal requirement to collect and use information to ensure that the schools comply with their statutory obligations.

Schools have a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website.

Schools also have a duty to issue Privacy Notices when collecting information. Each notice will summarise the information held, why it is held, and the other parties to whom it may be passed on. The schools may ask you to share information with us at various times. We will always ask for consent and we will explain what we are asking for and why we are asking for it.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act (2018) and other related legislation. It will apply to all personal information irrespective of whether it is held in paper files or electronically and regardless of the way it is collected, used, recorded, stored or destroyed.

The schools have to collect certain data because they are educational establishments and under the terms of the DPA(2018):

'6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'

In addition the schools have to process some data which is special category data and so is also bound by this condition of the DPA(2018):

'9(2)(d) - processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.'

All staff involved with the collection, use and disclosure of personal data will be aware of their duties and responsibilities by being appropriately trained. They will all adhere to this policy and the requirements of the DPA(2018).

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.

General Statement

The federation is committed to adhering to data protection principles at all times. Respecting data and the individual's rights to privacy. Therefore the schools 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 they hold
- 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
- Share information with others only when it is legal and 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 trained, fully understand, and follow, our policies and procedures

Linked Documents

Internal data protection procedures (apply to all operational staff within the federation):

- Data breaches
- Data deletion
- Data requests
- Data retention
- Data security
- Request to be forgotten
- Review cycle

In addition there are policies which should be read alongside this policy:

- Online safety
- Acceptable use
- Safeguarding and child protection
- Behaviour
- Staff code of conduct

Review

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

Contacts

If you have any enquires in relation to this policy, please contact Natalie Frey, Executive Headteacher.

Complaints

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

Further advice and information is available from the Information Commissioner's Office,