



Data Protection Policy and Procedures

Date of issue	Next review	Version	Signed: Chair of Governors	Signed: Headteacher
May 2018	May 2020			

Single Equality Statement

This Single Equality Scheme for schools in Mundella Primary School provides a format for addressing the statutory duties of the Equality Act 2010 and The Children and Families Act 2014. This supersedes and brings together all previous statutory duties in relation to race, gender and disability and also addresses the duty to promote community cohesion, thus meeting the school's statutory duties in these areas.

Our Access and Single Equality Scheme is available to view and download on our website.

Governor Statement

The Governing Body of Mundella Primary School works as a 'whole team', meeting 6 times per year; spread evenly across the year, without any separate committees excepting finance. In addition to these meetings, we have termly Governor Monitoring Visits (GMV); usually lasting around four hours and organised to effectively observe, scrutinise, challenge and support a range of school activities and personnel.

An agenda for each meeting and GMV will include all the tasks which the governing body is required to consider, and the governing body will plan assignments or activities; arising from the business of the meeting or that fall into the annual monitoring schedule, which will be recorded in the minutes and then undertaken as directed.

In addition to 'commissioning' activities or actions on their behalf, the governing body may wish to delegate monitoring activities to 'monitoring pairs' or 'individuals'. This could apply to statutory functions, and/or the priorities of the School Plan. They may also arrange to visit the school, or attend school activities, at any time; at the discretion of the Headteacher, to undertake monitoring activities as and when they are available to do so.

In each case, where a function has been delegated there is a statutory duty to report any action or decision to the governing body at the next meeting.



Mundella Primary School Data Protection Policy

The Data Protection Act 1998 is the law that protects personal privacy and upholds individual's rights. It applies to anyone who handles or has access to people's personal data.

This policy is intended to ensure that personal information is dealt with properly and securely and in accordance with the Data Protection Act. 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.

Scope of the Policy

Personal information is any information that relates to a living individual who can be identified from the information. This includes any expression of opinion about an individual and intentions towards an individual. It also applies to personal data held visually in photographs or video clips (including CCTV) or as sound recordings.

Mundella Primary School collects a large amount of personal data every year. As a state educational organisation, we recognise that much of our data collection is in the public interest therefore we collect and store data in order to support the smooth running of the school.

The data collected can take many forms including: staff records, names and addresses of those requesting prospectuses, examination marks, references, fee collection as well as the many different types of research data used by the school. In addition, we may be required by law to collect and use certain types of information to comply with statutory obligations of Local Authorities (LAs), government agencies and other bodies. Data may be stored on paper, electronically or both.

As well as information received on entry to Mundella Primary School, yearly data collection sheets affirm the understanding for the collection, storage and use of personal data linked to pupils and their families and, where appropriate, ask for additional consent.

Throughout the year additional data, pertaining to assessment, behaviour, attendance and additional support, is generated, collected and stored. A statement about this data is included on our data collection sheet; along with the eight rights outlined below.



2. The Eight Principles

The Act is based on eight data protection principles, or rules for 'good information handling'.

1. Data must be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specific and lawful purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
4. Personal data shall be accurate and where necessary kept up to date.
5. Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose.
6. Personal data shall be processed in accordance with the rights of data subjects under the 1998 Data Protection Act.
7. 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.
8. 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. Responsibilities

3.1 Mundella Primary School will:

- Manage and process personal data properly
- Protect the individuals right to privacy
- Provide an individual with access to all personal data held on them.

3.2 Mundella Primary School has a legal responsibility to comply with the Act. Mundella Primary School, as a corporate body, is named as the Data Controller under the Act.

Data Controllers are people or organisations who hold and use personal information. They decide how and why the information is used and have a responsibility to establish workplace practices and policies that are in line with the Act.

3.3 Mundella Primary School is required to 'notify' the Information Commissioner of the processing of personal data. This information will be included in a public register which is available on the Information Commissioner's website at the following link : http://www.ico.gov.uk/what_we_cover/promoting_data_privacy/keeping_the_register.aspx



3.4 Every member of staff that holds personal information has to comply with the Act when managing that information.

3.5 Mundella Primary School is committed to maintaining the eight principles at all times. This means that the school will:

- inform Data Subjects why they need their personal information, how they will use it and with whom it may be shared. This is known as a Privacy Notice.
- check the quality and accuracy of the information held
- apply the 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
- ensure appropriate security measures are in place to safeguard personal information whether that is held in paper files or on a computer system
- only share personal information with others when it is necessary and legally appropriate to do so
- set out clear procedures for responding to requests for access to personal information known as subject access in the Data Protection Act (*see appendix*)
- train all staff so that they are aware of their responsibilities and of Mundella Primary Schools relevant policies and procedures

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

Our flow diagram indicates where our data comes from, who is storing and processing it and where it is used by or transferred to other third parties. We make every effort to ensure that education partners and suppliers only receive data that is necessary and that all data is returned or deleted when no longer needed. The expanded diagrams highlight additional details about storage and use.

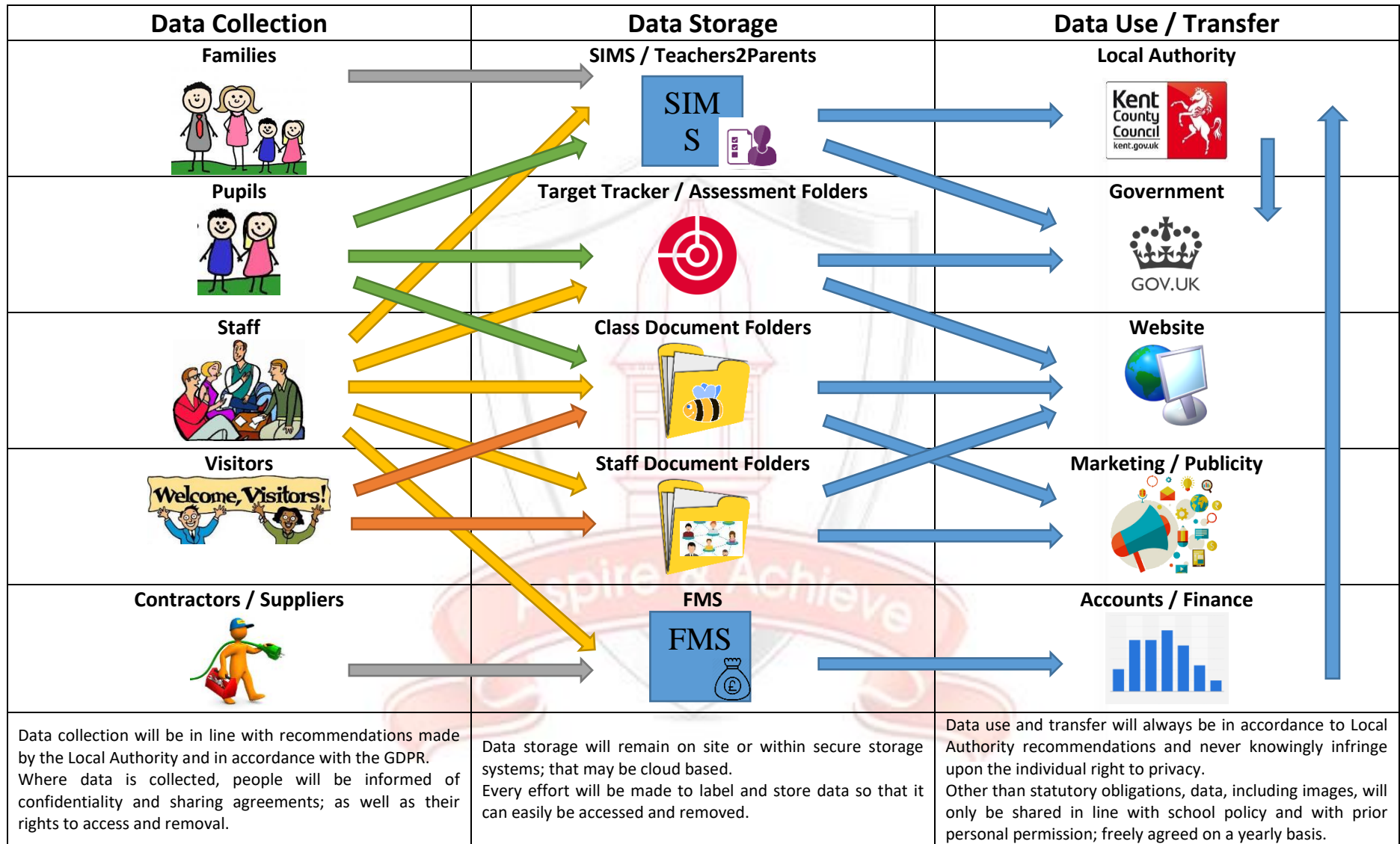
As part of our induction process and annual training programme, Data Protection will form part of our ongoing safeguarding provision; reviewed and supported annually.

The SAMSS DP team covers our Data Protection Officer role (DPO). Working collaboratively, they have the responsibility for monitoring the GDPR compliance of that Mundella Primary School.






Additional information is available from school and linked for download from our website.




GDPR Data Flow Diagram





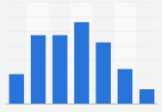



GDPR Electronic Data Storage and Processes

Data Storage	Location	Information Held	Access	Period of Storage	Security Level (Removal Difficulty)	Host Contact	Host Compliant (Checked by)
SIMS / Teachers2Parents 	School Server T2P Server	Personal, Family, Attendance, Behaviour, Attainment Personal, Financial	Levels of Access to all staff T2P Employees		4 (2) 5 (2)	FW 0845 388 5545	Yes (FW) Yes (FW)
Target Tracker / Assessment Folders 	School Server TT Server	Attainment Personal, Attendance, Attainment	Levels of access to teaching staff TT access		4 (2) 5 (3)	FW 0345 200 8600 support.tt@EESforschools.org	Yes (FW) Yes (FW)
Class Document Folders 	School Server Enc. Memory	Personal, Attainment Personal, Attainment	Levels of access for school staff Supplied to teaching staff		3 (1) 4 (2)	FW Class Teachers	Yes (FW) Yes (FW)
Staff Document Folders 	School Server Enc. Memory	Personal, Family, Attendance, Behaviour, Attainment Personal, Attendance, Behaviour, Attainment	Levels of access for school staff Supplied to teaching staff		3 (1) 4 (2)	FW Class Teachers	Yes (FW) Yes (FW)
FMS 	School Server Host Server	Personal Personal	Access for admin and SLT Host access		4 (2) 5 (3)	FW 0345 200 8600	Yes (FW) Yes (FW)






	<p style="text-align: center;">Security Level 1-5 1 : poor security and a high risk of a data breach – 5 : a very high confidence in security and an extremely low risk of a breach</p> <p style="text-align: center;">Removal Difficulty Level 1-5 1 : very easy to remove with a rapid guarantee of removal – 5 : more challenging to remove making the guarantee of removal a longer process</p>
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GDPR Electronic Data Storage and Processes

Data Use / Transfer	Location	Information Held	Access	Period of Storage	Security Level (Removal Difficulty)	Host Contact	Host Compliant (Checked by)
Local Authority 	KCC Server	Personal, Family, Attendance, Behaviour, Attainment	KCC Employees		5 (3)	03000 41 21 21	Yes (FW)
Government 	Government Server	Personal, Family, Attendance, Behaviour, Attainment	Government Employees		5 (3)	0370 000 2288	Yes (FW)
Website 	Host Server	Personal	Host Employees (with permission)		5 (2)	E4Education 0345 31 91 039	Yes (FW)
Marketing / Publicity 	Kent Press	Personal (Never full names without explicit or immediate permission)	Host Employees				
Accounts / Finance 	KCC Server	Personal	KCC Employees		5 (3)		Yes (FW)

	<p style="text-align: center;">Security Level 1-5</p> <p style="text-align: center;">1 : poor security and a high risk of a data breach – 5 : a very high confidence in security and an extremely low risk of a breach</p> <p style="text-align: center;">Removal Difficulty Level 1-5</p> <p style="text-align: center;">1 : very easy to remove with a rapid guarantee of removal – 5 : more challenging to remove making the guarantee of removal a longer process</p>
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GDPR Paper Data Storage and Processes

Data Collection	Location	Information Held	Access	Period of Storage	Security Level (Removal Difficulty)	Host Contact	Host Compliant (Checked by)
Families 	School Office Admin Office	Personal, Family Personal, Family,	Admin Team Admin Manager / Head		4 (2) 5 (2)	School	Yes (FW)
Pupils 	School Office Admin Office	Personal, Family Personal, Family, Attendance, Behaviour, Attainment	Admin Team Admin Manager / Head		4 (2) 5 (2)	School	Yes (FW)
Staff / Governors 	School Office Admin Office	Personal Personal, Contracts, Reports	Admin Team Admin Manager / Head		4 (2) 5 (2)	School	Yes (FW)
Visitors 	School Office Admin Office	Personal Personal	Admin Team Admin Manager / Head		4 (2) 5 (2)	School	Yes (FW)
Contractors / Suppliers 	School Office Admin Office	Personal Personal, Contracts, Reports	Admin Team Admin Manager / Head		4 (2) 5 (2)	School	Yes (FW)



Security Level 1-5

1 : poor security and a high risk of a data breach – 5 : a very high confidence in security and an extremely low risk of a breach

Removal Difficulty Level 1-5

1 : very easy to remove with a rapid guarantee of removal – 5 : more challenging to remove making the guarantee of removal a longer process