



## **Data Protection Policy**

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### **1. Purpose**

The purpose of this policy is to ensure compliance of Prenton High School for Girls with all of its obligations as set out in the General Data Protection Regulation.

### **2. Data Controller**

Prenton High School is the Data Controller as defined in the Data Protection Act 1998.

### **3. Notification with the Information Commissioner's Office (ICO)**

The school will notify the ICO of any personal data breaches within 72 hours, using the on-line form:

<https://ico.org.uk/for-organisations/guidance-index/data-protection-and-privacy-and-electronic-communications>

### **4. Definitions**

**Personal data** is information that relates to an identifiable living individual that is processed as data. Processing means collecting, using, disclosing, retaining, or disposing of information. The data protection principles apply to all information held electronically or in structured files that tells you

something about an identifiable living individual. The principles also extend to all information in education records. Examples would be names of staff and students, dates of birth, addresses, national insurance numbers, school marks, medical information, exam results, SEN assessments and staff development reviews.

**Sensitive personal data** is information that relates to race and ethnicity, political opinions, religious beliefs, membership of trade unions, physical or mental health, sexuality and criminal offences. There are greater legal restrictions on processing sensitive personal data than there are on personal data.

## 5. General Data Protection Principles

The principles set out under the General Data Protection Regulation are that data:

- Is processed fairly and lawfully in a transparent manner;
- Is obtained only for specified, explicit and legitimate purposes and is not further used in any manner incompatible with those original purposes;
- Is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Is accurate and, where necessary, kept up to date; every reasonable step is taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- Is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 6. Sharing Personal Information

Prenton High School will only share personal information with other organisations where there is a legal requirement to do so.

Prenton High School is required to share information with the Department for Education and the Education Funding Agency. Under certain circumstances, such as child protection, we may also be required to share information with the Children and Young Peoples' Department or the police.

Because students are of secondary school age, their own right to access their own personal information held by the school will be exercised through their parents or carers.

The Headteacher will be responsible for authorising the sharing of data with another organisation.

The Headteacher, in authorising the sharing of data will take account of:

- Whether it is lawful to share it;
- Whether there is adequate security in place to protect the information while it is being transferred and then held by the other organisation;
- The Privacy Notice includes an explanation of whom the information is being shared with and why.

## 7. Privacy of Personal Data

The school is committed to being clear and transparent about what type of personal information we hold and how it is used. The following 'Privacy Notice for Students and their Parents and Carers' will be published on the school Website.

## 8. Subject Access Requests

Requests from parents or students for access to personal data or educational records will be dealt

with as described in the Privacy Notice for Students and their Parents and Carers. Staff may have access to their personal data within 30 calendar days of a request and at no charge. The Data Protection Officer will maintain a documented record of all requests for personal information with details of who dealt with the request, what information was provided and when, and any outcomes.

## **9. Websites**

The Academy website will be used to provide important information for parents and students including our Privacy Notice and our Freedom of Information publication scheme.

Where personal information, including images, are placed on the web site the following principles will apply:

- We will not disclose personal information (including photos) on a web site without the consent of the student, parent, member of staff or Governor as appropriate;
- Comply with regulations regarding cookies and consent for their use;

## **10. CCTV**

Prenton High School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school building and grounds in order to provide a safe and secure environment for students, staff and visitors and to prevent loss or damage to school property.

The system comprises a number of fixed and dome cameras.

The system does not have sound recording capability.

The internal CCTV system is owned and operated by the school, the deployment of which is determined by the Headteacher.

The external CCTV is owned and operated by the PFI contractor (SPIE), the deployment of which is determined by the Headteacher.

The school's CCTV scheme is registered with the ICO under the terms of the Data Protection Act 1998.

The school complies with the ICO CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use.

CCTV warning signs are clearly displayed around all areas covered by CCTV.

CCTV footage is kept for a maximum of 3 months and is then automatically deleted from the system.

## **11. Photographs**

The school will only use photographs of students or staff taken for inclusion in the printed prospectus or other school publications where we hold parental consent for such use.

## **12. Processing by Others**

Prenton High School remains responsible for the protection of personal data that is processed by another organisation on its behalf. As part of a contract of engagement other organisations that process data on behalf of the Academy will have to specify how they will ensure compliance with GDPR.

## **13. Training**

The Headteacher will ensure that all staff are adequately trained to understand their responsibilities in relation to this policy.