



### Mission Statement

“A Caring Christian Family Where We Grow Together”

## DATA PROTECTION POLICY

**Effective Date:** 01/04/2017

**Review Date:** March 2022

Review Date	Signed Executive Headteacher	Signed Director RCSAT
21 May 2018		
02/09/2018		
16/03/2020		

Persons Responsible for Policy:	Executive Headteacher RCSAT
Approval Date	01/04/2017
Signed:	Director RCSAT
Signed:	Executive Headteacher RCSAT

## 1. Policy Statements

- 1.1. The Governing Body is committed to keeping certain information about its employees, students and other users to allow it to monitor performance, achievements, and health and safety, for example.
- 1.2. It is also necessary to process information so that staff can be recruited and paid, courses organised and legal obligations to funding bodies and government complied with.
- 1.3. On the 25th May 2018 the General Data Protection Regulation (GDPR) became applicable and the current Data Protection Act (DPA) will be updated by a new Act giving effect to its provisions.
- 1.4. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, Rural Church Schools Academy Trust must comply with the Data Protection Principles which are set out in the General Data Protection Regulation (GDPR) and listed below.

## 2. The Data Protection Principles

- 2.1. In summary these state that personal data shall be:
  - 2.1.1. Processed fairly, lawfully and in a transparent manner.
  - 2.1.2. Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
  - 2.1.3. Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed.
  - 2.1.4. Accurate and, where necessary, kept up to date.
  - 2.1.5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
  - 2.1.6. Processed in a way 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.
- 2.2. RCSAT Schools and all staff or others who process or use personal information must ensure that they follow these principles at all times. In order to ensure that this happens, the RCSAT has developed this Data Protection Policy.

## 3. Legal framework

3.1. This policy has due regard to legislation, including, but not limited to the following:

- The General Data Protection Regulation (GDPR)
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998

3.2. This policy will also have regard to the following guidance:

- Information Commissioner's Office (2017) 'Overview of the General Data Protection Regulation (GDPR)'
- Information Commissioner's Office (2017) 'Preparing for the General Data Protection Regulation (GDPR) 12 steps to take now'
- All Article 29/European Data Protection Board Working Party Guidance on the implementation of GDPR

- Department of Education 'Data Protection: a toolkit for schools'
- IRMS Information Management Toolkit for Schools.

**3.3.** This policy will be implemented in conjunction with the following other school policies and procedures;

- Data Protection Procedure
- Records Management and Retention Procedure
- IT Acceptable Use Procedure
- Freedom of Information Policy
- Information Rights Procedure
- Data Breach Procedure
- School Homeworking Procedure
- Mobile Phone Procedure
- Subject Access Request Procedure
- Right of Access During School Holidays Procedure
- Exemptions Request Procedure
- Data Handling Procedure
- E-Safety Procedure

#### **4. Implementation**

**4.1.** The Governing Body has delegated the responsibility for the implementation of this policy through written procedures to the Executive Headteacher and named staff.

#### **5. Governors' responsibilities**

**5.1.** This document is a statement of the aims and principles of the School, for ensuring the confidentiality of sensitive information relating to staff, pupils, parents and governors.

#### **6. Review**

**6.1.** The governing body reviews this policy every two years.

**6.2.** The governors may, however, review the policy earlier than this, if the government introduces new regulations, or if the governing body receives recommendations on how the policy might be improved.

