**St Jerome’s RC Primary School Formby**

**Data Protection Policy**

**1. Introduction**

St Jerome’s RC Primary School Formby is committed to protecting the privacy and security of personal data. This policy outlines how the school collects, uses, stores, and shares personal data in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant legislation.

**2. Scope**

This policy applies to all staff, governors, volunteers, and contractors of St Jerome’s RC Primary School Formby who process personal data on behalf of the school. It covers all personal data processed by the school, regardless of format, including:

* Pupil data (e.g., names, addresses, contact details, academic records, medical information, special educational needs)
* Staff data (e.g., names, addresses, contact details, employment records, payroll information)
* Governor data (e.g., names, addresses, contact details)
* Volunteer data (e.g., names, addresses, contact details, DBS checks)
* Contractor data (e.g., names, addresses, contact details, company information)
* Visitor data (e.g., names, contact details, CCTV footage)

**3. Data Protection Principles**

The school will process all personal data in accordance with the following data protection principles:

* **Lawfulness, fairness, and transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner.
* **Purpose limitation:** Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
* **Data minimisation:** Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
* **Accuracy:** Personal data will be accurate and, where necessary, kept up to date.
* **Storage limitation:** Personal data will be 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.
* **Integrity and confidentiality:** Personal data will be 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.
* **Accountability:** The school will be responsible for and able to demonstrate compliance with the data protection principles.

**4. Roles and Responsibilities**

* **Headteacher:** The Headteacher is responsible for overseeing the school's data protection compliance.
* **Data Protection Officer (DPO):** Peter Rafferty (peter@row7education.co.uk) is the designated DPO and is responsible for advising the school on data protection matters, monitoring compliance, and acting as the point of contact for data subjects and the ICO.
* **Staff:** All staff are responsible for ensuring that they process personal data in accordance with this policy and any relevant training.
* **Governors:** The governing body is responsible for ensuring that the school has appropriate data protection policies and procedures in place.

**5. Data Collection**

The school will only collect personal data that is necessary for its legitimate purposes. The school will collect personal data from the following sources:

* Pupils and parents/carers
* Staff
* Governors
* Volunteers
* Contractors
* Visitors

**6. Data Use**

The school will use personal data for the following purposes:

* **Pupil education and welfare:** Providing education, monitoring progress, supporting pupils' well-being, and ensuring their safety.
* **Staff management:** Administering payroll, managing performance, and ensuring staff safety.
* **School administration:** Managing admissions, communicating with parents/carers, and maintaining school records.
* **Compliance with legal obligations:** Meeting statutory requirements, such as those relating to safeguarding and child protection.

**7. Data Sharing**

The school may share personal data with the following third parties:

* **Local Authority:** Providing information for school admissions, census returns, and educational support services.
* **Department for Education (DfE):** Providing data for national statistics and performance monitoring.
* **Other schools and educational institutions:** Sharing information for pupil transitions and collaborative projects.
* **Health and social care services:** Sharing information to support pupils' health and well-being.
* **Law enforcement agencies:** Sharing information to comply with legal obligations or to prevent or detect crime.

The school will only share personal data where it is necessary and lawful to do so.

**8. Data Security**

The school will take appropriate technical and organisational measures to protect personal data from unauthorised access, use, disclosure, alteration, or destruction. These measures include:

* **Physical security:** Secure storage of paper records and access control to school premises.
* **IT security:** Password protection, encryption, and firewalls to protect electronic data.
* **Staff training:** Providing staff with regular data protection training.

**9. Data Subject Rights**

Individuals have the following rights in relation to their personal data:

* **Right of access:** To request access to their personal data.
* **Right to rectification:** To request correction of inaccurate or incomplete personal data.
* **Right to erasure:** To request deletion of their personal data in certain circumstances.
* **Right to restriction of processing:** To request limitation of the processing of their personal data in certain circumstances.
* **Right to data portability:** To request transfer of their personal data to another organisation in certain circumstances.
* **Right to object:** To object to the processing of their personal data in certain circumstances.

Individuals can exercise their data subject rights by contacting the school's DPO.

**10. Data Retention**

The school will retain personal data for no longer than is necessary for the purposes for which it was collected. Retention periods will be determined in accordance with legal obligations and best practice guidance.

**11. Data Breaches**

The school will report any personal data breaches to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, where feasible. The school will also notify affected individuals where there is a high risk to their rights and freedoms.

**12. Policy Review**

This policy will be reviewed annually or more frequently if required by changes in legislation or school practices.

**13. Contact Information**

For any questions or concerns about this policy, please contact the school's DPO:

Peter Rafferty Data Protection Officer St Jerome’s RC Primary School Formby, Greenloons Drive, Formby 01704 832 211 peter@row7education.co.uk

**Approved by:**

P Murray 2024