



**Watford Grammar School for Girls**

## **Data Protection Policy**

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## Introduction

Watford Grammar School for Girls collects a lot of data and information about our pupils so that we can run effectively as a school. This document set out our policy with regard to managing that data and how we discharge our legal and moral responsibilities to safeguard it.

Watford Grammar School for Girls is an Academy Trust school, company number 07348254, registered office at Lady's Close, Watford, WD18 0AE, registered as a company in England and Wales, and an exempt charity. We are well known for our rich academic curriculum, our strong and supportive pastoral care, and the wide range of extended activities that, taken as a whole, educate, encourage and empower our girls. The school motto is *Sperate Parati* - or 'Go forward with preparation' - which encapsulates our aim for every member of the school community.

We are proud of the strong academic traditions and the importance of service to others that have shaped the ethos of our school since its foundation by Elizabeth Fuller in 1704. We value hard work and nurture scholarship, always encouraging our girls to achieve excellence in all fields of study. The girls have the opportunity to excel at music, drama and sport, as well as to play an active role in the wider community by taking part in many charitable activities. Thus they learn to be their best selves: hard working, compassionate and high achieving in all areas of life.

We are a diverse and thriving community, founded on consideration, toleration and trust. Each girl is given opportunities to develop confidence and resilience both in and outside the classroom, and to develop a sense of personal responsibility that is best summarised in the maxim 'I can do it, and I will do it' - words which every member of the school learns and takes to heart.

As part of ensuring the effective running of our school it is essential that we hold and use data and information about parents/carers, pupils, staff, governors, and others with whom we have relationships. It is important to us that we do this professionally and in line with our statutory, moral and contractual obligations, and this policy is part of how we explain how we do this. Legally the school is a Data Controller under the Data Protection Act 2018 / the General Data Protection Regulation, and the responsible officer at the school is Zia Rehman who is Data Protection Officer.

This policy applies to related organisations the Women of Vision Trust (charity no. 1069040) and the Old Grammarian Alumnae organisation, as well as the School.

## 1. Aims

Our school aims to ensure that all data collected about staff, pupils, parents and visitors is collected, stored and processed in accordance with the [General Data Protection Regulation](#) / the [Data Protection Act 2018](#).

This policy applies to all data, regardless of whether it is in paper or electronic format.

## 2. Legislation and guidance

This policy meets the requirements of the [Data Protection Act 2018](#) and is based on [guidance published by the Information Commissioner's Office](#) and [model privacy notices published by the Department for Education](#).

This policy complies with our funding agreement and articles of association.

## 3. Definitions

Term	Definition
<b>Personal Data</b>	<p>Personal data is information relating to an identifiable living individual. It can be any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.</p> <p>This definition provides for a wide range of personal identifiers to constitute personal data, including name, but also including identification number, location data or online identifier.</p>
<b>Sensitive Personal Data</b>	<p>Data such as:</p> <ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Political opinions</li><li>• Religious beliefs, or beliefs of a similar nature</li><li>• Where a person is a member of a trade union</li><li>• Physical and mental health</li><li>• Sexual orientation</li><li>• Genetic and/or biometric information</li></ul> <p>Sensitive Personal Data is described as 'special category data' under the General Data Protection Regulation and the school must therefore have a valid reason under <a href="#">Article 9 of</a></p>

	<p>the <u>GDPR</u> for collecting and processing that data.</p> <p>The following data is not specifically defined as Sensitive Personal Data but similar safeguards apply to any processing of it:</p> <ul style="list-style-type: none"> <li>• Whether a person has committed, or is alleged to have committed, an offence</li> <li>• Criminal convictions</li> </ul>
<b>Processing</b>	<p>Obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including –</p> <ol style="list-style-type: none"> <li>Organisation, adaptation or alteration of the information or data</li> <li>Retrieval, consultation or use of the information or data</li> <li>Disclosure of the information or data by transmission, dissemination or otherwise making available, or</li> <li>Alignment, combination, blocking, erasure or destruction of the information or data</li> </ol>
<b>Data Subject</b>	The person whose personal data is held or processed
<b>Data Controller</b>	A person or organisation that determines the purposes for which, and the manner in which / means by which, personal data is processed
<b>Data Processor</b>	A person or organisation responsible for processing personal data on behalf of a Data Controller

#### 4. The Data Controller

Our school processes personal information relating to pupils, staff, parents, governors and others, and, therefore, is a Data Controller. Our school delegates the responsibility of data controller to the Assistant Head, Curriculum and Data.

The school is registered as a Data Controller with the Information Commissioner's Office and renews this registration annually. You can check the register entry [here](#).

## 5. Data protection principles

The School's policy, aligned with the General Data Protection Regulation / Data Protection Act 2018, is that data shall be:

- (a) Processed lawfully, fairly and in a transparent manner in relation to individuals
- (b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with these purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes by the School shall not be considered to be incompatible with the initial purposes;
- (c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- (d) Accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data which is inaccurate, having regard to the purposes for which it is processed, will be erased or rectified without delay;
- (e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; although the School may store personal data for longer periods insofar as this personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to the implementation by the School of appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- (f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and/or organisational measures

In addition, the School will:

- Ensure that Personal Data shall not be transferred to a country or territory outside the European Economic Area unless the country or territory ensures an equivalent or adequate level of protection for the rights and freedoms of data in relation to the processing of personal data
- Process Personal Data for one or more of the reasons permitted under GDPR Schedule 6, and Sensitive Personal Data for one or more of the reasons permitted under GDPR Schedule 9. The reasons are listed in the relevant Privacy Notices (see section 7 of this Policy).
- Record if and when data subjects consent to the processing of their personal data in a particular way or for a particular reason, or if data subjects decline to give consent.

## 6. Roles and responsibilities

The governing board has overall responsibility for ensuring that the school complies with its obligations under the General Data Protection Regulation / the Data Protection Act 2018.

Day-to-day responsibilities rest with the headteacher, or the deputy headteacher, in the headteacher's absence. The headteacher will ensure that all staff are aware of their data protection obligations.

In compliance with the GDPR / Data Protection Act, the School has an appointed Data Protection Officer who is responsible for dealing with any queries related to the storing or processing of personal data, and checking to ensure that the School is adhering to this policy and to its wider legal obligations. The Data Protection Officer is Zia Rehman.

Staff are responsible for ensuring that they collect and store any personal data in accordance with this policy. Staff must also inform the school of any changes to their personal data, such as a change of address.

## 7. Privacy/fair processing notices

The School has an obligation to be clear and specific about the data it controls and processes, the basis for this, and what processing or sharing of data can or does take place. This is set out in the Privacy Notices which vary depending on whose data is being processed. Detailed Privacy Notices for the following categories of data set out what data can be collected or processed, on what basis, and how and why it may be shared:

Pupils / Potential Pupils

Parents / Carers of Pupils, Potential Pupils and Past Pupils

School Employees

Governors / Trustees

School Volunteers, Agency Staff and Self-Employed Contractors

**The Privacy Notices should be read in conjunction with this policy.**

## 8. Subject Access Requests

Under the Data Protection Act 2018 / The General Data Protection Regulation, data subjects – pupils, parents, staff, governors, or whoever the School may process data about - have a right to request access to information the School holds about them. Requesting access to information held about an individual by that individual is known as a Subject Access Request.

Subject access requests must be submitted in writing, either by letter or email. Requests should include:

- The name of the data subject
- A correspondence address
- A contact number and email address
- Details about the information requested

School Employees should submit their request to the Executive Assistant to the Headmistress.

All other Subject Access Requests should be sent to the School addressed to the Data Protection Officer, Zia Rehman.

Subject Access Requests will be dealt with in compliance with the General Data Protection Regulation / the Data Protection Act 2018. The School will not charge you for answering a Subject Access Request but may charge for repeat requests or duplicate copies of personal data already provided in response to a Subject Access Request.

The School may take steps to verify the identity of an individual making a Subject Access Request to ensure that confidentiality and privacy is maintained.

In general children have the same rights regarding their personal data as adults, including when making Subject Access Requests. However as a general principle children under the age of 13 are not considered to be able to give their own consent for data processing and parental consent would be sought instead.

The school will not reveal the following information in response to subject access requests:

- Information that might cause serious harm to the physical or mental health of the pupil or another individual
- Information that would reveal that the child is at risk of abuse, where disclosure of that information would not be in the child's best interests
- Information contained in adoption and parental order records

- Certain information given to a court in proceedings concerning the child
- Examination information out of due time

Subject access requests will normally be responded to within one month. It would greatly assist the School to expedite Subject Access Requests if they are made in term time when the School is more fully staffed.

## **9. Parental requests to see the educational record**

Parents of pupils at this school do not have an automatic right to access their child's educational record. The school will decide on a case-by-case basis whether to grant such requests, and we will bear in mind guidance issued from time to time from the Information Commissioner's Office (the organisation that upholds information rights). If you wish to request access to your child's educational record, please write to the Data Protection Officer, Zia Rehman, at the school, giving details of the child's name, your name, your contact address, email address and telephone number, and a note of the information which you would like to access.

## **10. Biometric data**

As the School has a cashless catering system, we also act as data controller for biometric data about pupils in this regard. Biometric data is classed as Sensitive Personal Data for the purposes of this Policy, and the School processes the data accordingly, see part 3 above.

The school operates this system for good reason: it avoids any difficulties with loss or theft or misplacement of lunch money, avoids distinction between pupils who do or do not receive free school meals, and facilitates an orderly and speedy provision of lunch as part of the school day. The School will make a considered assessment of any other use of biometric data systems if it considers introducing them, and the system will always require an opt-in for pupils to take part. The opt in clearly states what is being done, why, and how biometric data is protected.

The school's current biometric system providers, CRB Cunninghams, are the data processors for this data and hold it on their systems. CRB Cunninghams are accredited to ISO 27001 standard for information security.

A copy of the statement on the safeguarding of data provided by CRB Cunninghams is available on request from the Data Protection Officer, Zia Rehman.

## **11. Storage of records**

- Whenever possible, personal data will be stored electronically on the School's network drives. Access is not permitted to these network drives other than by properly authorised staff. If staff need to work with personal data outside of the school building, they can do so by using the secure remote log-in to access the network drive.
- Access to the school's computer systems including for laptops and other portable electronic devices is password-protected. Passwords must be at least 8 characters long and contain letters and numbers. Staff and pupils are reminded to change their passwords at regular intervals
- The school recognises that there may be occasions when it is appropriate for a staff member to save personal data to their own device. Staff are provided with detailed guidance about how to keep personal data secure when using their own devices and are responsible for following this guidance.
- Staff are required to take great care when handling paper-based records to ensure that the personal data in these records is not shared inadvertently. Papers containing confidential personal

information should not be left on office and classroom desks, or on staffroom tables, or in any other place where they may be viewed other than by an authorised person.

- Pupils or governors who may be using personal information are expected to follow the same security procedures, and the School will remind them to do so.

## **12. Disposal of records**

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely.

For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic or paper-based records.

## **13. Training**

Our staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation or the school's processes make it necessary. The headteacher is responsible for ensuring that staff are trained, aware of their data protection responsibilities, and carry them out.

## **14. The General Data Protection Regulation**

This policy has been updated in line with the new General Data Protection Regulation / the Data Protection Act 2018.

## **15. Monitoring arrangements**

The Assistant Head, Curriculum and Data, is responsible for monitoring and reviewing this policy.

The designated governor, who is also the Data Protection Officer, checks that the school complies with this policy by, among other things, reviewing school records.

This document will be reviewed at least every two years, if there is a significant change in the law or in official guidance on the implementation of the law, and following the implementation of the General Data Protection Regulation.

At every review, the policy will be shared with the governing board.

## **16. Links with other policies**

This Data Protection Policy is linked to:

- the Freedom of Information Publication Scheme
- the Privacy Notices described above
- the Data Retention Policy
- the Information Security Policy
- the CCTV Policy

These documents, which may be updated from time to time by the School, are available on the School's website or upon request to the Data Protection Officer, Zia Rehman.