

GENERAL DATA PROTECTION REGULATION 2018 (GDPR) - DATA PROTECTION POLICY

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1. TERMS

1.1. "Data controller" means the person, or body, which determines the purposes and means of the processing.

1.2. "Data processor" means the person, or body, which processes data on behalf of the data controller.

1.3. "Processing" means obtaining, recording or holding the information or data or carrying out any or set of operations on the information or data.

1.4. "Data subject" means an individual who is the subject of personal data or the person to whom the information relates.

1.5. "Personal data" means data which relates to a living individual who can be identified. Addresses and telephone numbers are particularly vulnerable to abuse, but so can names and photographs be, if published in the press, internet or media.

1.6. "Sensitive data" means data revealing racial or ethnic origin, religious or philosophical beliefs, trade union membership, physical or mental health condition, sexual life, criminal offences or proceedings.

1.7. "Parent" has the meaning given in the Education Act 1996 and includes any person having parental responsibility or care of a child.

2. AIMS AND PRINCIPLES

2.1. The Governing Body, acting as the school's Data Controller, has overall responsibility for ensuring that records are maintained, including security and access arrangements, in accordance with our policies and all other statutory requirements.

2.2. The Principal and staff, as data processors, intend to comply fully with the requirements and principles of the General Data Protection Regulation (GDPR). All staff involved with the collection, processing and disclosure of

personal data are aware of their duties and responsibilities within these guidelines.

2.3. The GDPR includes the following rights for individuals:

The right to be informed;

The right of access;

The right to rectify inaccurate or incomplete data;

The right to deletion or removal of personal data;

The right to restrict processing;

The right to object; and

The right not to be subject to automated decision-making, including profiling.

2.4. William Morris Sixth Form (WMSF) will uphold the six principals of GDPR that are categorised within this policy, namely that:

- 🎬 Data will be treated with fairness and transparency;
- 🎬 Data will be used for legitimate reasons (lawful processing);
- 🎬 Data will be used for a relevant purpose;
- 🎬 Records will be kept accurate and up to date;
- 🎬 Records will be kept no longer than necessary; and
- 🎬 Data will be processed in a secure manner.

3. FAIR OBTAINING AND TRANSPARENCY

3.1. WMSF undertakes to obtain and process data fairly and lawfully by informing all data subjects of the reasons for data collection, the purposes for which the data are held, the likely recipients of the data and the data subjects' right of access.

3.2. We will only collect and hold data when there is a clear and justifiable reason for doing so.

3.3. Information about the use of personal data is printed on the appropriate collection form.

3.4. If details are given verbally, the person collecting will explain the issues before obtaining the information.

3.5. We will make every reasonable effort to ensure that data is accurate and kept up-to-to date.

3.6. We will destroy data when the reason to hold it ceases to be relevant and/or it has reached the time limit of our retention guidelines. (Please see the section on data retention for further information).

3.7. We will inform all data subjects of the reasons for any change to data collection, and who might have access to that data.

3.8. We will ensure that all data subjects are given their right of access to personal data.

3.9. Appendix 1 and 2 lists the data that we collect and process for our staff, students, governors and visitors.

For more details, please read our Privacy Notice which can be found on our website:

<https://www.wmsf.ac.uk/policies-and-values/39.html>

4. LAWFUL PROCESSING AND CONSENT

4.1. The lawful basis for the collection, processing and storing of personal data is **public task** unless otherwise stated. We are authorised to collect and use student information under Article 6 and Article 9 of the GDPR.

4.2. We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

4.3. We share students' data with the Department for Education (DfE) on a statutory basis.

4.4. We will make it clear if the lawful basis for collecting data is consent. If we require consent for any purpose other than our legal obligation, for example, use of photographs for marketing, social media or educational visits, we will request consent on the appropriate form.

4.5. In order for the school to support student learning, there are occasions during a student's school life, where their full name will be provided to a third party supplier in order to facilitate full access to the curriculum and additional services that the school provides.

4.5.1. Students will be made aware of any data sharing to third parties for this purpose and only William Morris Sixth Form encrypted email addresses will be used (i.e. @wmsf.ac.uk).

4.5.2. Third party data is deleted once the student leaves the school.

4.5.3. Students, who have been granted access by the school to resources after they have left, may register with their own email address and by doing so accept full responsibility for any data shared.

4.5.4. The table below lists the third party IT resources used at William Morris Sixth Form

Learning Area

Third Party Data Sharing

Learning Resources Centre

Careers and Progression

Curriculum Resources

Heritage library

management system

Work Ready/UCAS/Unifrog

Mathswatch/Class

Charts/Turnitin