Ysgol Croes Atti

DATA PROTECTION POLICY

Accepted by the Governing Body

What is Information Governance?

Information Governance can mean different things to different people. It is a term that is used to describe the way we manage our obligations to the following legislation:

· GDPR
· Regulation of Investigatory Powers 2000
· Environmental Information Regulations 2004
· Freedom of Information Act 2000
· Re-use of Public Sector Information Regulations 2005
· Records Management (cop s46 FOIA)

It allows both the School and its employees to ensure that both business and personal information is dealt with legally, securely, efficiently and effectively, in order to deliver the best possible services.

The Information Governance Framework sets out the way the School handles information, in particular, the personal and sensitive data relating to our students, staff and suppliers.

Information Governance - aims

The aims of Information Governance are to:

● comply with all relevant legislative requirements thereby protecting individuals, and organisation
● manage the creation, storage, movement and sharing of data in a secure and efficient manner
● support the provision of high quality service delivery by promoting the effective and appropriate use of information
● encourage staff and partners to work together, preventing duplication of information, effort and enabling more efficient use of shared data resources
● develop support arrangements which provide staff with information and appropriate Information Governance policies and guidance
● provide training and support to enable staff to discharge their responsibilities under the various acts - all to consistently high standards

The School has a set of high level corporate policies in place which direct all Information Governance & Management. These are supported by detailed procedures setting out exactly how staff must work to follow our policy.

Information Risk Management

Information risk is inherent in all administrative and business activities and everyone working for or on behalf of the Authority continuously manages information risk. Information risk management is an essential element of information governance and is an integral part of good management practice. The intent is to embed information risk management in a very practical way into business processes and functions.

Information Assets

An information asset is a body of information, defined and managed as a single unit so it can be understood, shared, protected and exploited effectively. Information Assets (IA) have recognisable and manageable value, information lifecycle. By identifying IAs it is possible to quantify risk, mitigate and control risks and individuals who manage and control the asset and risks.

How to Identify an Information Asset
1) Does the information have a value to the organisation? i.e.
   a. How useful is it? Will it cost money to reacquire?
   b. Would there be legal, reputational or financial repercussions if you couldn't produce it on request?
   c. Would it have an effect on operational efficiency if you could not access it?
   d. Would there be consequences for not having it?

2) Is there a risk associated with the information? i.e.
   a. Is there a risk of losing it?
   b. A risk that it is not accurate?
   c. A risk that someone may tamper with it?
   d. A risk arising from inappropriate disclosure?

3) Does the class of information have a specific content? i.e.
   a. Do you understand what it is
   b. What it does?
   c. Does it include the context of the data?

4) Does the information have a manageable lifecycle? i.e.
   a. Are all the components created for a common purpose?
   b. Have the same retention date
   c. Be disposed of in the same way and according to the same rules?

Privacy Impact Assessments

Are a means of assessing risk when processing personal information. They should be conducted at the start of any project collecting personal digital data. There is a statutory need to conduct them where special category data or there is a high risk of data. Further information is included in the PIA template and procedure.

Information Security

Information stored and processed by the council or by third parties working on behalf of the School should be recognised and managed as a valuable asset and subject to the same resource management processes as any other UT resource. When data is created, stored, transmitted or communicated it must be protected from unauthorised access, use, modification or destruction.

Without adequate levels of protection, confidentiality, integrity and availability of information it is not possible to comply with obligations including legal, statutory and contractual requirements. Personal data should be encrypted or pseudonymised where possible.

All access to, and use of information should follow the information governance principles.

Confidentiality

Appropriate measures must be taken to ensure that information is accessible only to those authorised to have access.

Integrity

The accuracy and completeness of information must be maintained and all changes affecting that information must be authorised, controlled, and validated.

Availability

Information must be available to authorised individuals when required. In the event of a disaster or other events, Flintshire County Council information and the systems critical to the success of our organisation must be recoverable in accordance with plans.

Authentication

All persons and systems seeking access to information or to our networked computer resources must first establish their identity to Flintshire County Councils' satisfaction.

Access Control

The privilege to view or modify information, computer programs, or the systems on which the information resides, must be restricted to only those whose job functions absolutely require it.

Compliance

User access to information, and activity on the organisations computers, firewalls and networks must be recorded and maintained in compliance with all security, retention, relevant legislation and regulatory requirements.

It is the responsibility of each member of staff to adhere to the School's Security Policies.

Information Sharing

Information sharing is key to the Authority's goal of delivering better, more efficient services that are coordinated around the needs of the individual. It is essential to enable early intervention and preventative work, for safeguarding and promoting welfare and for wider public protection. Information sharing is a vital element in improving outcomes for all.

Taking our responsibilities for handling information seriously

At the heart of Information Governance is training. This is so that staff can all understand how managing information affects their working lives and be fully aware of their responsibilities. A key responsibility concerns managing personal protected information. There have been many cases in the public sector of data breaches where staff have lost computers, memory sticks, emailed and faxed personal information to the wrong people. Policies and procedures can be put in place but training helps staff to understand what they are doing and how to implement them.

Roles

Governing Body

Ysgol Croes Atti is the Data Controller and owns the policy; fulfils a monitoring role; manages complaints and reviews the policy as appropriate. The Data Protection Officer will provide advice and assistance in these functions.

Head Teacher (with Data Protection Officer)

Provide an annual update to the Governing Body

Data Protection Officer

To provide an independent overview of compliance issues. Provide advice and assistance when requested and advise and assist on complaints.

All staff

Must complete Information Security & Data Protection Training every 12 months to ensure they are compliant in how they use and protect information in their work activities.

Letter to Parents

The Collection of Personal Information

We collect information about pupils and their parents or legal guardians during the school year. Flintshire County Council and Welsh Assembly will receive information on pupils from Ysgol Croes Atti normally as part of what is called the Pupil Level Annual Schools Census which takes place in January each year.

Personal information held

The personal information collected includes:
- personal identifiers and contacts (such as name, date of birth, photograph, unique pupil number, contact details and address)
- characteristics (such as ethnicity, national identity, immigration status, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- additional learning needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as teacher assessments, National Tests and End of Key Stage results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- information about the involvement of social services with individual pupils where this is needed for the care of the pupil.

Ysgol Croes Atti will ensure that information is secure.

How we collect pupil information

We collect pupil information via data collection forms completed by yourselves and Common Transfer Files (CTF's) from previous schools where applicable.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

The use made of this personal information

Welsh Government uses the information collected to do research, primarily to inform educational policy changes and funding. The research is done in a way that ensures individual pupils cannot be identified. Flintshire County Council also uses the personal information collected to do research. It uses the results of the research to make decisions on policy and the funding of schools, to calculate the performance of schools and help them to set targets.

Ysgol Croes Atti uses personal information to contact parents and guardians by mobile phone or email with regards to: emergencies; school information sharing (e.g. trips); newsletters; communications regarding events in the school; communications from the Parents group associated with Ysgol Croes Atti; Governors; NEWydd Catering; Payments/Finances; and information that may be of interest to families e.g. Community events.

Ysgol Croes Atti and Flintshire County Council will use the information collected to administer the education it provides to pupils. For example:
- the provision of educational services to pupils including VLE's
- monitoring and reporting on pupils' educational progress
- the provision of welfare, pastoral care, and health services; ALN and transport requirements
- exclusions and attendance
- the giving of support and guidance to pupils their parents and legal guardians
- the organisation of educational events and trips
- planning and management of the school
- recording of monetary payments to and from pupils and parents/guardians.

Digital / Printed Images

During the school year photographs and videos are taken of your child. Processing of photographs is necessary for the purposes of assessment and sometimes in other printed publications. We also use them on our school website, prospectus, induction booklets, internal displays, your child's VLE and School Twitter account. *(Article 6:1e - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller).*

We do not name pupils in the public domain (e.g. newspaper, Twitter) unless parental permission has been sought.

For those pupils with serious medical conditions we will also use your child's photograph to inform members of staff, which include lunchtime supervisors and NEWydd catering team. These will be displayed in the School Kitchen, School Office and Staffroom.

Occasionally, our school may be visited by the media who will take photographs or film footage. Children may appear in these images, which will sometimes be published in local or national newspapers, or on approved websites or twitter pages. Please be aware that children who do not have consent will be asked to step out of the photograph.

Please be aware that images taken by parents at group events e.g. sporting events, school plays etc., are for personal use only and **NO** image of another child should ever be shared without the express consent of the parent of that child.

Organisations who may share personal information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.
Information held by Ysgol Croes Atti, Flintshire County Council and Welsh Assembly on pupils, their parents or legal guardians may be shared with other organisations, for example with:

- other education and training bodies, including schools, when pupils are applying for courses, training, school transfer or seeking guidance on opportunities
- assessment data control companies
- School communication companies
- bodies doing research for the Welsh Assembly and Flintshire County Council so long as steps are taken to keep the information secure
- central and local government for the planning and provision of educational services
- social services and other health and welfare organisations where there is a need to share information to protect and support individual pupils
- various regulatory bodies, such as ombudsmen, inspection authorities and Government fraud initiatives, where the law requires that information be passed on so that they can do their work.

Your rights as an individual under the Data Protection Act 1998

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, please see the contact details below.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/

Seeking further information

For further information about the personal information collected and its use, if you have concerns about the accuracy of personal information, or wish to exercise your rights under the Data Protection Act 1998, you should contact either:

- Mr Gwyn Jones Headteacher, Ysgol Croes Atti 01352 733335 prifcroesatti@hwbcymru.net
- Data Protection Officer for Ysgol Croes Atti info@gdbr.co.uk

Information can also be sought from:
- Information Commissioner's office 01625 545 745. www.informationcommissioner.gov.uk

School Contact Mr Gwyn Jones Ysgol Croes atti Chester Road Fflint CH6 5DU	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
prifcroesatti@hwbcymru.net	www.ico.gov.uk
Ysgol Croes Atti Data Protection Officer George Harris Data Privacy Services	Governing Body Contact Mr D Read
George@dataprivacyservices.co.uk	www.ysgolcroesatti.co.uk