**William Cassidi C. E. Aided Primary School**

**General Data Protection Regulations (GDPR) Policy**

From 25th May 2018, the Data Protection Act (1998) will be replaced by the General Data Protection Register (GDPR) which will affect how we manage all data and information within our school. All schools will have a continued duty of care to ensure that data is kept safe and secure but the responsibility to ensure that this data/information (regardless of the form it is kept in) is managed in the right way and compliant is increased. Non-compliance with the GDPR regulations can result in fines of up to £500,000 from the Information Commissioners Office (ICO).

GDPR is designed to strengthen and unify the safety and security of all data held within an organisation and whilst there are similarities between the DPA and the GDPR there are also significant differences which will impact upon the way data is handled and information managed within school. The GDPR gives increased rights to individuals which include:

* The right to be forgotten and erased from records
* The right to request a copy of personal data in a commonly use portable electronic format
* Consent means a clear statement or affirmative action which is freely given, specific, informed and unambiguous
* Parental/guardian consent is required to process children’s data
* A reduced time frame for controllers to respond to subject access requests and no ability to charge for such requests.

There a number of identified GDPR roles within our organisation:

**Data Protection Officer:**

The Data Protection Officer (DPO) for William Cassidi C.E. Aided Primary School is: Mrs. Colleen Peters, Chair of Governors. The DPO role has responsibility for the school’s data protection compliance. The DPO has knowledge of the school systems, support from the Data Controller and authority to effectively undertake their GDPR duties.

**The Data Controller:**

The Data Controller is Mrs. Julie Cornelius, Head Teacher. This role determines the purposes for which and the manner in which any personal data are or are to be processed. Data Controllers are responsible for compliance with the following principles and must be able to demonstrate this to data subjects and the regulator:

Personal data should be:

1. Processed lawfully, fairly and in a transparent manner,
2. Collected for specified, explicit and legitimate purposes,
3. Adequate, relevant and limited to what is necessary,
4. Accurate and where necessary kept up to date,
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which those data are processed, and
6. Processed in a manner that ensures appropriate security of the personal data.

The Data Controller should undertake specific actions to ensure the organisation complies with the GDPR including:

* The formulation and presentation of a GDPR policy and an Information Security policy to the Governing Body which are both regularly reviewed
* Provide data protection awareness training for all staff and promote a positive culture data protection compliance across the school including how to identify and report breaches
* The compilation of an Information Asset Register which details the data held, where it came from, who it is shared with and what is done with the data
* Continually review the types of data processing carried out by the school, including identifying the lawful base for carrying it out and regularly review the amount and type of data we collect, process and store
* Manage information risks in a structured way to ensure that the management understands the business impact of personal data related risks and manages them effectively through a GDPR Risk Register which enables threats to be analysed and logged
* Devise Privacy Notices (children, Looked After/Children in Need, school workforce) which clearly inform the individual’s right to object ‘at the point of first communication’
* Develop systems to record and manage ongoing consent
* Establish a process to recognise and respond to individuals’ requests to access their personal data
* Establish processes to ensure that the personal data held remains accurate and up to date
* Establish a process to securely dispose of personal data that is no longer required or where an individual has asked for it to be erased
* Develop procedures to respond to an individual’s request to restrict the processing of their personal data
* Develop processes to allow individuals to move, copy or transfer their personal information from one IT environment to another in a safe and secure way, without hindrance to usability
* Identify processing operations which constitute automated decision making and develop procedures to deal with the associated requirements
* Ensure that the school has a written contact with any data processors utilised by the school
* Develop a Data Protection Impact Assessment (DPIA), screening process and framework for risk management and project management processes
* Ensure any data to be transferred out of the EU is handled in compliance with the conditions set out in Chapter V of the GDPR, safely and securely
* Devise mechanisms for identifying, reporting, managing and resolving personal data breaches.

**The Data Processors:**

The Data Processor, in relation to personal data means any person (other than an employee of the data controller) who processes the data on behalf of the Data Controller.

Processing, in relation to information or data means obtaining, recording or holding information or data or carrying out any operation or set of operations on the information or data, including:

* organisation, adaptation or altering of the information or data
* retrieval, consultation or use of the information or data
* disclosure of the information or data by transmission, dissemination or otherwise making available, or
* alignment, combination, blocking, erasure or destruction of the information or data.

William Cassidi School Data Processors: Stockton-on-Tees Local Authority including Xentrall (e.g. personal, payroll) (via SIMS only accessed by the administrator and head teacher), One IT Services and Solutions, ICT Reverse.

**School Staff:**

All employees of the school should undertake specific actions to ensure the organisation complies with the GDPR and safeguards data including:

* Documenting what personal data is held, where it came from, who it is shared with and what we do with it
* Undertaking CPD on data protection, the GDPR and the schools policy
* Adhere to all policies, systems and processes devised under GDPR
* Contribute to the positive culture of data protection within the school
* Manage all data effectively and securely, ensuring it is up to date and accurate, but is reflective of requests given to the Data Controller to supress the processing of specified individual’s personal data
* Contribute to the Information Asset Register, the GDPR Risk Register and the Data Protection Impact Assessment (DPIA)
* Identify, report and manage personal data breaches
* Maintain lists and manage data securely, complying with all regulations
* Respond to the Data Controller’s request following requests from individuals

In addition to the above the School Administrator will:

* Issue and maintain Privacy Notices (children, Looked After/Children in Need, school workforce)
* Securely dispose of personal data which is no longer required in line with an agreed timescale

**General Principles:**

Personal data will not be collected, processed or retained any longer than is necessary for the purpose it was designed for. The guidance provided by the Information Commissioner’s Office (ICO) will be referred to, to ensure that the school meets not only the new requirements of the GDPR on the 25th May 2018 but to ensure that data is continued to be safely and securely held in the future and that all regulations are continually met. Please refer to the school’s Data Information Register for details of the various types of data or information held, which identifies where it came from, who it is shared with and the length of time it will be held for along with the justification of why those lengths of time are in place.

**Adults:**

All people whose personal data is collected will be informed through William Cassidi’s privacy notices. The privacy notice will inform each individual of the school’s legal basis for processing the data, the data retention periods and the individuals’ right to complain to the ICO about the way the school has handled their data. Privacy notices will be provided in a paper format to each individual and placed on the school website in an electronic form. Each individual’s consent will be sought, obtained and recorded through the signing and dating of a privacy notice. These notices will be kept securely in each individual’s personal file and recorded electronically on a Privacy Notices List.

**Children:**

The GDPR introduces special protection for children (anyone under 13 years of age) which includes all pupils of William Cassidi C. E. Aided Primary School. Consent for data processing activities will be sought from parents/guardians for each individual at our school.

**Individuals’ Rights:**

The school has procedures which ensure that the rights of individuals. These rights include the right to: be informed; of access; to rectification; to erasure; to restrict processing; to data portability; to object; and the right not to be subject to automated decision making. An individual who requests that their data is erased will be informed by the school’s Data protection Officer of the location and procedures undertaken to delete their personal data. An individual who request the right to data portability will be provided with their data in a suitable commonly used and machine readable format and free of charge.

**Subject Access Requests:**

The school acknowledges the rights of an individual to request information on the data held about them by the school. The school will respond to formal requests providing information in a timely manner (usually within a month). The school will aim to help data subjects access their data but during school holidays this may become more difficult. However, the school reserves the right to refuse or charge for requests that are either manifestly unfounded or excessive and we will inform the individual why and of their right to complain to the supervisory authority and to a judicial remedy. A log of data requests will be kept by the Administrator who will also consider the GDPR data principles (why data was gathered, how it is used, how it is kept, how it is protected) and how the data can be extracted, reviewed presented to be applicant.

**Data Breeches:**

The school will adopt effective procedures to detect, report and investigate a personal data breach. A personal data breech refers to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Each breech will be recorded in the ‘Data Breech Log’ and investigated, however small, and a culture of ‘report it always’ is encouraged to enable assessment of procedures and steps to be taken to minimise breeches and assessment of impact of breeches. Breaches where the individual is likely to suffer some form of damage will be reported to the ICO. A serious breech that interferes with the rights and freedom of the data subject will be reported to the ICO within 72 hours of the breech.

**Data Protection Impact Assessments (DPIA):**

The school will undertake a DPIA which is required in all high-risk situations for example when new technology is being deployed. The process to be adopted by the school will include: consultation with the Governing Body on the necessity of the system; consultation with the ICO to ascertain if in its opinion the processing operation complies with the GDPR; consultation with all stakeholders as to the requirements of the system and its use, and a final decision as to the deployment of the system taking into account all information gathered from the consultation process.

**International:**

The GDPR identifies regulations for organisations which operate in more than one EU member state. William Cassidi C. E. Aided School solely operates within England and therefore does not refer to the guidance provided in The Article 29 Working Party.

Policy prepared by: Mrs. J. Cornelius

Approved by the Governing Body: 17th June 2020

Date for Review: June 2022

**Annual Data Protection Agreement:**

I agree to abide by the GDPR Policy and all ICO recommendations.

Name: Signature:

Date:

Appendix1:

**Privacy Notice: How We Use Pupil Information**

At William Cassidi C. E. Aided Primary School we are required to gather information in order to register a child at our school, to communicate with their family, to educate them and provide statutory information to the Local Authority and the DFE required of a school. This document communicates privacy information for our school under Article 3 of the GDPR (25th May 2018).

**The categories of pupil information that we collect, hold and share include:**

* Personal information: Data to confirm the child’s identity, their age and residence as well as those who have parental responsibility for them. Each child is assigned a Unique Personal Number (UPN) by the first school they are registered with which remains with them throughout their school life.
* Characteristics: Data including ethnicity, language spoken, nationality, county of birth and free school meal eligibility. For those applying for additional 3 and 4 year old hours we are also required to gather additional data including National Insurance numbers and times of work.
* Attendance information: Schools are required to record, process and analyse data including the sessions attended, number of absences and absence reasons.
* Other information: School also gathers information on medical needs, special education needs, exclusions and behavioural information as well as assessment information and information relating to safeguarding, health and safety, and child protection.

**Why we collect and use this information:**

We use the pupil data to:

* Support pupil learning
* Monitor and report on pupil progress
* Provide appropriate pastoral care
* Assess the quality of our services
* Comply with the law regarding data sharing.

**The lawful basis on which we use this information:**

We collect and use pupil information under Articles 6, 7, 8 and 9 of the GDPR (25th May 2018) and the Education Act 1996.

**Collecting pupil information:**

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this. It may be that if certain voluntary information is withheld then a pupil may not be able to participate in certain activities.

**Storing pupil data:**

We hold pupil data for the statutory required length of time on our SIMS system. When a pupil leaves our school through transfer to another setting we upload a CTF for the new school to be able to download the required information. Paper data (individual books, assessments, Looked After, Child Protection and safeguarding records) is delivered by hand to the new setting or if the distance is prohibitive then is posted using registered mail. All other paper based data (including: individual consent forms to school visits, attendance at clubs and their registers, home/school agreements, Internet Usage and IT agreements) is shredded at the end of each academic year unless it is required as evidence in an investigation. Class data is stored until the class has transferred to secondary education unless it is required to be retained (for example: DFE returns, reports, statutory assessment results and analysis, attendance registers) for the required time.

**Who we share pupil information with:**

We routinely share pupil information with:

* Schools that the pupil’s attend after leaving us
* Our Local Authority
* The Department for Education (DfE)
* The National Health Service (NHS) – school nurse

We routinely collect and analyse pupil data on the following systems:

* Our platform provider – eschools (website access and text messaging service)
* Our assessment tool – Target Tracker

We share information (for a limited time) to enable a Year 6 visit to take place with:

* Our Residential Visit setting – RobinWood.

**Why we share pupil information:**

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so. We share pupils’ data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with our Local Authority (LA) and the Department for Education (DfE) under section 3 of the Education (Information About Individual Pupils) (England) Regulations 2013.

**Data Collection Requirement:**

To find out more about data collection requirements placed on us by the Department for Education (for example via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

**Additional Information:**

Should you require additional information or clarification please contact the schools’ Data Controller, Mrs. Julie Cornelius who may be contacted at William Cassidi C. E. Aided Primary School, Morrison Street, Stillington, Stockton-on-Tees. TS 21 1JD or by telephone 01740 630270.

May 2018

Appendix 2:

**Privacy Notice: How We Use Children in Need and Children Looked After Information**

At William Cassidi C. E. Aided Primary School we are required to gather information in order to provide statutory information to the Local Authority, its Virtual School and the DFE as required of a school. This document communicates privacy information for our school under Article 3 of the GDPR (25th May 2018).

**The categories of this information that we collect, process, hold and share include:**

* Personal information (such as name, date of birth and address, contact and access details)
* Characteristics (such as gender, ethnicity, special educational needs and disability, and behavioural information)
* Information relating to episodes of being a Child in Need (such as referral information, assessment information, Section 47 information, Initial Child Protection information and Child Protection Plan information)
* Episodes of being Looked After (such as important dates, information on placements)
* Outcomes for Looked After children (such as whether health and dental assessments are up-to-date, strengths and difficulties questionnaire scores and offending)
* Adoptions (such as dates of key court orders and decisions)
* Care Leavers (such as their activity and what type of accommodation they have).

**Why we collect and use this information:**

We use this personal data to:

* Support these children and monitor their progress
* Provide them with pastoral care
* Assess the quality of our services
* Evaluate and improve our policies on children’s social care.

**The lawful basis on which we use this information:**

We collect and use pupil information under Articles 6, 7, 8 and 9 of the GDPR (25th May 2018) and the Education Act 1996.

**Collecting this information:**

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this. It may be that if certain voluntary information is withheld then a pupil may not be able to participate in certain activities.

**Storing this information:**

We hold pupil data or the statutory required length of time on our SIMS system. When a pupil leaves our school through transfer to another setting we upload a CTF for the new school to be able to download the required information. Paper data (individual books, assessments, Looked After, Child Protection and safeguarding records) is delivered by hand to the new setting or if the distance is prohibitive then is posted using registered mail. All other paper based data (including: individual consent forms to school visits, attendance at clubs and their registers, home/school agreements, Internet Usage and IT agreements) is shredded at the end of each academic year unless it is required as evidence in an investigation. Class data is stored until the class has transferred to secondary education unless it is required to be retained (for example: DFE returns, reports, statutory assessment results and analysis, attendance registers) for the required time.

**Who we share pupil information with:**

We routinely share pupil information with:

* Schools that the pupil’s attend after leaving us
* Our Local Authority
* The Department for Education (DfE)
* The National Health Service (NHS) – school nurse

We routinely collect and analyses pupil data on the following systems:

* Our platform provider – eschools (website access and text messaging service)
* Our assessment tool – Target Tracker

We share information (for a limited time) to enable a Year 6 visit to take place with:

* Our Residential Visit setting – RobinWood.

**Why we share pupil information:**

We share Children in Need and Children Looked After data with the Department for Education (DfE) on a statutory basis, under Section 83 of the 1989 Children’s Act, Section 7 of the Young People’s Act 2008 and also under Section 3 of The Education (Information About Individual Pupils) (England) regulations 2013. The data sharing helps to develop national policies, manage Local Authority performance, administer and allocate funding and identify and encourage good practice.

We do not share information about our Children in Need or Children Looked After without consent unless the law and our policies allow us to do so (such as our Local Authority or the individuals home Local Authority).

**Data collection requirements:**

To find out more about the data collection requirements placed on our school by the Department for Education please go to:

Children Looked After: <https://www.gov.uk/guidance/children-looked-after-return>

And:

Children In Need: <https://www.gov.uk/guidance/children-in-need-census>

**Additional Information:**

Should you require additional information or clarification please contact the schools’ Data Controller, Mrs. Julie Cornelius who may be contacted at William Cassidi C. E. Aided Primary School, Morrison Street, Stillington, Stockton-on-Tees. TS 21 1JD or by telephone 01740 630270.

May 2018

Appendix 3:

**The National Pupil Database (NPD)**

The NPD is owned and managed by the Department for education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years’ census. Some of this information is then stored in the NDP. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, please go to:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

* Conducting research or analysis
* Producing statistics
* Providing information, advice or guidance.

The department has robust processes in place to ensure confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

* Who is requesting the data
* The purpose for which it is required
* The level and sensitivity of data requested: and
* The arrangements in place to store and handle the data.

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information about the department’s data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact the DfE, please go to:

<https://www.gov.uk/contact-dfe>

Requesting access to your personal data:

Under data protection legislation, parents, carers and children have the right to request access to information about them that we hold. To make a request for your personal information contact our Data Protection Officer. The Data Protection Officer (DPO) for William Cassidi C.E. Aided Primary School is: Mrs. Colleen Peters, Chair of Governors.

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 (not normally undertaken at our school)
* object to decisions being taken by automated means
* in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
* claim compensation for damages caused by a breach of the Data Protection regulations.

If you have a concern 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/>

**Contact:**

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer: Mrs. Colleen Peters, Chair of Governors via the school. William Cassidi C. E. Aided Primary School, Morrison Street, Stillington, Stockton-on-Tees. TS 21 1JD or by telephone 01740 630270.

May 2018

Appendix 4:

**Privacy Notice: How We Use School Workforce Information**

At William Cassidi C. E. Aided Primary School we are required to gather information from all those who are employed to work in our school. The personal information is utilised to enable the individuals to be employed by our school and for us to be able to fulfil our statutory requirements. This information is obtained in order to provide statutory information to the Local Authority.

The categories of school workforce information that we collect, process, hold and share include:

* personal information (such as name, employee or teacher number, national insurance number, DBS information, addresses, next of kin and payroll information including pension information)
* special categories of data including characteristics information (such as gender, age, ethnic group, medical information)
* contract information (such as start dates, hours worked, work patterns, post, roles and salary information, right to work information)
* work absence information (such as number of absences and reasons)
* qualifications (and, where relevant, subjects taught).

**Why we collect and use this information:**

We use school workforce data to:

* enable the development of a comprehensive picture of the workforce and how it is deployed
* inform the development of recruitment and retention policies
* enable individuals to be paid and for the correct contributions to be made by the individual (including superannuation, pension and national insurance contributions).

**The lawful basis on which we process this information:**

We process this school workforce information for general purposes under Articles 6, 7, 8 and 9 of the GDPR (25th May 2018) and under the Education Act 1996 (Departmental Censuses). A guide of this information can be found on the following website:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

**Collecting this information:**

Whilst the vast majority of information you provide us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

**Storing this information:**

We hold school workforce data within our SIMS system which is held for specified lengths of time. The GDPR strengthens rights of the individual and the principles of Data protection. The SIMS system allows correction and deletion of data. The GDPR allows for personal information held to be deleted upon request under the ‘right to be forgotten’ element of the regulations. In addition, individuals have the right of portability of data which we are able to provide electronically and in a commonly used format.

**Who we share this information with:**

We routinely share this information with:

* our Local Authority (Stockton-on-Tees)
* the Department for Education (DfE)

**Why we share school workforce information:**

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

* Local Authority: We are required to share information about our workforce members with our Local Authority (LA) under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
* Department for Education: We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding/expenditure and the assessment of educational attainment.

**Data collection requirements:**

The DfE collects and processes personal data relating to those employed by schools and Local Authorities that work in state funded schools. All state funded schools are required to make a census submission because it is a statutory return under Sections 113 and 114 of the Education Act 2005.

To find out more about the data collection requirements placed on us by the DfE including the data that we share with them, please go to:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

* Conducting research or analysis
* Producing statistics
* Providing information, advice or guidance.

The department has robust processes in place to emsure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

* Who is requesting the data
* The purpose for which it is required
* The level and sensitivity of data requested; and
* The arrangements in place to securely store and handle the data.

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department’s data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

**Requesting access to your personal data:**

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the school’s Data Protection Officer (DPO). The DPO for William Cassidi C.E. Aided Primary School is: Mrs. Colleen Peters, Chair of Governors. She may be contacted via the school: William Cassidi C. E. Aided Primary School, Morrison Street, Stillington, Stockton-on-Tees. TS 21 1JD or by telephone 01740 630270.

All requests will be processed within one month. 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 (not normally undertaken at our school)
* object to decisions being taken by automated means
* provide additional information to people making requests such as, data retention periods
* in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
* claim compensation for damages caused by a breach of the Data Protection regulations.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner’s Office (ICO) at: <https://ico.org.uk/concerns/>

**Further information:**

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer: Mrs. Colleen Peters, Chair of Governors via the school. William Cassidi C. E. Aided Primary School, Morrison Street, Stillington, Stockton-on-Tees. TS 21 1JD or by telephone 01740 630270.

May 2018

Appendix 5:

**William Cassidi C. E. Aided Primary School**

**Data Breech Log**

|  |  |  |
| --- | --- | --- |
| **Details of Breech:**  Date: Time:  Type of breech:  Who affected: | **Investigation:** | **Outcome:**  Changes to Practices/  Inform IOC |
| **Details of Breech:**  Date: Time:  Type of breech:  Who affected: | **Investigation:** | **Outcome:**  Changes to Practices/  Inform IOC |
| **Details of Breech:**  Date: Time:  Type of breech:  Who affected: | **Investigation:** | **Outcome:**  Changes to Practices/  Inform IOC |
| **Details of Breech:**  Date: Time:  Type of breech:  Who affected: | **Investigation:** | **Outcome:**  Changes to Practices/  Inform IOC |

Appendix 6:

**William Cassidi C. E. Aided Primary School**

**Subject Access Request Form**

The school acknowledges the rights of an individual to request information on the data held about them by our school. The school will respond to formal requests providing information in a timely manner (usually within a month). The school will aim to help data subjects access their data but during school holidays this may become more difficult. However, the school reserves the right to refuse or charge for requests that are either manifestly unfounded or excessive and we will inform the individual why and of their right to complain to the supervisory authority and to a judicial remedy.

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(please insert the name of the person making the

request) would like a Subject Access Request to view part/all of the data (delete as

appropriate) held by the school for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (please insert name).

The data I would like access to is:

(please complete as applicable).

If this data is for a child I confirm that I have parental responsibility for that child:

I have / do not (delete as appropriate) have parental responsibility for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(name of child).

Name: Signature: Date:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**For school use only:**

Date of receipt of request:

Date of response to request:

List of data supplied:

Name: Signature: Date:

Further response from applicant: Yes/No (delete as applicable) Date:

Actions required: Yes/No (delete as applicable)

Actions undertaken:

Actions completed: Name: Signature: Date:

Appendix 7:

**William Cassidi C. E. Aided Primary School**

**Annual GDPR Data Consent Form**

Dear Parent/Carer,

At William cassidi C.E. Aided Primary School we sometimes take photographs of children. We use these photographs to record your child’s achievements, participation in activities and to record their work. We also use these images in their workbooks, on displays in their classroom, around school and in our newspaper as well as on the class e-schools page and occasionally on our website.

We would like your consent to take photographs of your child and use them in the ways described above. If you are not happy for us to do this we will accommodate your preferences. Please tick the relevant box (es) below that you give consent for and return this form to school as soon as possible.

I am happy for the school to take photographs of my child

I am happy for photographs of my child to be used in their books and around school

I am happy for photographs of my child to be used in our school newspaper

I am happy for photographs of my child to be used on their class e-schools page

I am happy for photographs of my child to be used on our school website

I am happy for photographs of my child to be used on our school Facebook page

I am happy for photographs of my child to be taken during school activities and events off site for example sporting events, performances and educational visits:

By the school By third parties (organisers of events)

I am not happy for the school to take or use photographs of my child

*If you change your mind at any time, you may let us know by emailing school, writing a letter or by coming into the school office. If you have any queries please contact us.*

**Why are we asking for your consent again?**

You will be aware that new data protection rules came into effect from 25th May 2018. To ensure we are meeting the new requirements we are re-seeking your consent. We value using photographs of your child to showcase what they do in school and to show what life in our school is like, so we would greatly appreciate you taking the time to give consent again.

**Name (s) of Children:**

**Parent/Carer’s name: Signature: Date:**

**Please note:** Children’s books will be sent home at the end of the academic year in which the books are completed. Photographs will be deleted/removed from storage/display at the end of the academic year in which the child leaves our school unless specific consent is sought for retention and use in school. The school does not use photographs of pupils in our computer systems for identity management. Photographs of pupils with specific medical conditions are displayed in the staffroom (which has limited access and is not a public area) to ensure all members of staff are aware of each child’s medical needs. Printing and photocopying takes place via a networked computer system or standalone systems not in public areas. The school does not utilise any forms of biometric regulation systems (finger print technology for use in a library or for school lunches) should any system be introduced consent would be sought.