



**Sheffield Springs Academy**

The best in everyone™

Part of United Learning

## Data Protection Policy

Updated September 2019



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## Scope

This policy applies to anyone employed or contracted to work at Sheffield Park and Sheffield Springs Academies.

### 1. Definitions

- 1.1 **“Personal data”** means any information relating to an identified or identifiable natural person ("data subject").
- 1.2 an **“identifiable person”** is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person
- 1.3 **“Processing”** means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 2. Policy Statement

Sheffield Park and Sheffield Springs Academies value the personal information entrusted to us and will process personal data in accordance with the principles set out in the General Data Protection Regulation (GDPR). Sheffield Park and Sheffield Springs have put in place policies, procedures and guidance to ensure that we will always:

- determine the legal basis for the processing of personal data and document this;
- be open with individuals about how we use their information and who we give it to;
- only process personal data in a manner consistent with the purpose for which it was collected;
- consider and address the privacy risks when we are planning to use or hold personal information in new ways, such as when introducing new systems;
- have processes in place to ensure the accuracy of personal data held;
- keep personal information to the minimum necessary and delete it when we no longer need it;
- have processes in place to enable individuals to exercise their rights as set out in the GDPR,
- have appropriate technical and organisational measures in place to make sure personal information is kept securely and only accessed on a need to know basis;
- provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly;
- put appropriate financial and human resources into looking after personal information.

### 3. Accountability

To enable Sheffield Park and Sheffield Springs Academies to demonstrate compliance with the GDPR the schools will implement the following Data Protection policies and procedures, and maintain appropriate records as required by these procedures:

#### Transparency

1. Privacy notices for pupils and parents (policy and template)
2. Employee data protection policy (not yet available)

#### Privacy Rights

3. Rights of the data subject policy
4. Guidance on the rights of the data subject

## Accountability and Records Management

5. Records Management Policy
6. Records Retention Schedule
7. Procedure for keeping records of data processing activities

## Security of Personal Data

8. Security of personal data policy
9. Technical security policy
10. Acceptable usage policy
11. Procedure for the secure transfer of files
12. Bring your own device to work policy
13. Procedure for notification of a personal data breach
14. Data sharing policy and procedure
15. Data Protection Impact assessment policy, procedure and guidance

Andrea Garnett, Business Services Director will be responsible for ensuring that these policies and procedures are implemented and adhered to. All staff must receive data protection training appropriate to their role. Each school will keep records to demonstrate compliance with these policies and procedures.

Central office staff will, from time to time, conduct audits to ensure compliance.

Version number:	1.0		Target Audience:	All staff
Sheffield Park & Springs:	Both		Reason for version change:	GDPR
Date Authorised:	06.04.2018		Name of owner/author:	Andrea Garnett
Date issued:	16.04.2018		Name of individual/department responsible:	Andrea Garnett, Business Services Director