

# **Data Protection Policy at Hadrian School**

## **Our Commitment**

Hadrian School is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA). Hadrian School is fully compliant with the new GDPR Regulations (May 2018).

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The member of staff responsible for Data Protection is a representative of Judicium. The school is also committed to ensuring that all staff are aware of Data Protection Policies, legal requirements and adequate training is provided.

The requirements of this policy are mandatory for all staff employed at Hadrian School and any third party contracted to provide services within the school.

Note: the school does not hold any Biometric Information on staff or pupils so this is not covered within this policy. If the school do use this in the future a new policy will be issued.

## **Notification**

Our data processing activities will be registered with the Information Commissioner's Office (ICO) as required of a recognised Data Controller. Details are available from the ICO: <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Changes to the type of data processing activities being undertaken shall be notified to the ICO and details amended in the register.

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

## **Personal and Sensitive Data**

All data within the school's control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

"Guidance Notes for the Operation of this Policy by Governors are available in The Governors Handbook, Supplement 2026, Page 6 Managing Information – Guidance for Governors"

The definitions of personal and sensitive data shall be as those published by the ICO for guidance: <https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

**The principles of the Data Protection Act shall be applied to all data processed:**

- Processed fairly and lawfully
- Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes
- Accurate and, where necessary, kept up to date
- Adequate, relevant and not excessive in relation to the purposes for which it is processed
- Not kept for longer than is necessary for those purposes
- Processed in accordance with the rights of data subjects under the DPA
- Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
- Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information.

### **Fair Processing / Privacy Notice**

Hadrian School shall be transparent about the intended processing of data and communicate these intentions via notification to staff, parents and pupils prior to the processing of an individual's data. No data will be shared without appropriate consent from Parents/Carers. No data will be passed to third parties for marketing purposes.

Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

The intention to share data relating to individuals to an organisation outside of our school shall be clearly defined within notifications and details of the basis for sharing given.

The GDPR Regulations give anyone the right who we hold information for to 'be forgotten' and can request that we remove all personal data about them. Consent cannot be withdrawn for data that has already been processed. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

### **Data Security**

In order to assure the protection of all data being processed and inform decisions on processing activities, Hadrian School will continually undertake an assessment of the

associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Security of data shall be achieved through the implementation of proportionate physical and technical measures. Nominated staff shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data.

### **Data Access Requests (Subject Access Requests)**

All individuals whose data is held by us, has a legal right to request access to such data or information about what is held. We shall respond to such requests within 30 days and they should be made in writing to David Palmer – School Business Manager. A charge may be applied to process the request.

<https://ico.org.uk/media/for-organisations/documents/1586/personal-information-online-small-business-checklist.pdf>

<https://ico.org.uk/media/for-organisations/documents/1235/definition-document-schools-in-england.pdf>

### **Photographs and Video**

Images of staff and pupils may be captured at appropriate times and as part of educational activities for use in school only.

Unless prior consent from parents/pupils/staff has been given, the school shall not utilise such images for publication or communication to external sources.

**It is school's policy that external parties (including parents) may not capture images of staff or pupils during such activities without prior consent from the school.**

### **Data Disposal**

The school recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data held in any form of media (paper, tape, electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services. Hadrian School uses an approved supplier – 'Shred It' to dispose of any paper copies on site on a monthly basis. All electronic data is disposed of using the services of the Newcastle Local Authority IT Team.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

**Disposal of IT assets holding data shall be in compliance with ICO guidance:**

[https://ico.org.uk/media/for-organisations/documents/1570/it\\_asset\\_disposal\\_for\\_organisations.pdf](https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf)

The school works within the 'Information and Records Management Society Retention Guidelines for Schools Policy' (Version 4 2006), ensuring data is held for the appropriate duration of time and disposed of securely when the retention period has passed.

**If you have any questions or queries please contact:**

**Chris Rollings – Head Teacher**

**Email:** [chris.rollings@hadrian.newcastle.sch.uk](mailto:chris.rollings@hadrian.newcastle.sch.uk)

**Tel:** 0191 273 4440

**or**

**David Palmer – Business Manager**

**Email:** [david.palmer@hadrian.newcastle.sch.uk](mailto:david.palmer@hadrian.newcastle.sch.uk)

**Tel:** 0191 273 4440