



Mission Statement

A Christ-centred family, illuminated by the light of faith, inspired to achieve.

A Christ centred family,

We will achieve this by:

- fostering positive and supportive relationships
- being sensitive to the needs of others
- following positive class rules and codes of conduct
- reaching out to the wider community
- valuing parents as educators
- involving ourselves in community events
- welcoming parents and friends of the school to celebrations, acts of collective worship and assemblies
- supporting the Parish by meaningful preparation for the Sacraments of Confirmation, Reconciliation and Eucharist
- supporting those less fortunate through fundraising, eg CAFOD, Good Shepherd

...illuminated by the light of faith,

We will achieve this by:

- adults being role models
- with Jesus as our example, offering service to others
- creating an environment of respect where every individual is valued as a child of God
- celebrating and rejoicing in our faith and experiences
- celebrating difference through our understanding of other faiths and cultures
- using every opportunity to promote spiritual and moral development
- participating in high quality collective worship and enriching liturgies
- delivering enthusiastically a well resourced, well planned RSE and 'Come and See' Scheme of work.

... inspired to achieve.

We will achieve this by:

- discovering and encouraging the talents of every individual
- giving children the opportunity and encouragement to try new things
- recognising that each individual learns in their own different way, making allowances for preferences
- creating a learning culture, classroom community, collaborative and personalised learning
- building self esteem
- delivering quality INSET to continue professional development enhanced by Performance Management for staff
- valuing effort
- using a range of teaching styles to cater for all abilities and learning styles
- embracing all opportunities to experience the joy of discovery, solving problems and being creative
- offering a wide range of extra-curricular activities
- issuing written reports and results
- embracing new technologies to improve home/school partnership
- meeting challenge with openness and bravery valuing an open dialogue between school and home by inviting parents to information evenings and pupil progress meetings
- valuing an open dialogue between school and home by inviting parents to information evenings and pupil progress meetings

School Motto

In the light of God's love, together we will grow.

General Data Protection Regulation Policy (GDPR)

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1 Policy statement

- 1.1 Everyone has rights with regard to the way in which their **personal data** is handled and as a Catholic School we place high value on the dignity of the individual in relation to the handling of their personal data. During the course of our activities as a School we will collect, store and **process personal data** about our pupils, **workforce**, parents and others. This makes us a **data controller** in relation to that **personal data**.
- 1.2 We as a Catholic School are committed to the protection of all **personal data** and **special category personal data** for which we are the **data controller**.
- 1.3 The School is committed to ensuring respect, objectivity, belief in the dignity of the individual, consistency and fairness in relation to data protection within a Catholic School.
- 1.4 The law imposes significant fines for failing to lawfully **process** and safeguard **personal data** and failure to comply with this policy may result in those fines being applied.
- 1.5 All members of our **workforce** must comply with this policy when **processing personal data** on our behalf. A deliberate or negligent breach of this policy may result in disciplinary or other action.

At Our Lady & All Saints Catholic Primary School we will strive to uphold the policy statements. We will work hard to ensure that all aspects of our school mission statement are upheld in conjunction with this policy.

2 About this policy

- 2.1 The types of **personal data** that we may be required to handle include information about pupils, parents, our **workforce**, and others within and beyond our Catholic community. The **personal data** which we hold is subject to certain legal safeguards specified in the General Data Protection Regulation ('GDPR'), the Data Protection Act 2018 and other regulations (together '**Data Protection Legislation**').
- 2.2 This policy and any other documents referred to in it set out the basis on which we will **process** any **personal data** we collect from **data subjects**, or that is provided to us by **data subjects** or other sources.
- 2.3 This policy does not form part of any employee's contract of employment and may be amended at any time.
- 2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we process **personal data**.

3 Definition of data protection terms

- 3.1 All defined terms in this policy are indicated in **bold text**, and a list of definitions is included in the Annex to this policy.

4 Data Protection Officer

- 4.1 As a School we are required to appoint a Data Protection Officer (“DPO”). Our DPO is Jessica Watson and she can be contacted at mrswatson@ourladyallsaints.lancs.sch.uk or on 01257462466 during school hours.
- 4.2 The DPO is responsible for ensuring compliance with the Data Protection Legislation and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the DPO.
- 4.3 The DPO is also the central point of contact for all **data subjects** and others in relation to matters of data protection.

5 Data protection principles

- 5.1 Anyone **processing personal data** must comply with the data protection principles. These provide that **personal data** must be:
 - 5.1.1 **Processed** fairly and lawfully and transparently in relation to the **data subject**;
 - 5.1.2 **Processed** for specified, lawful purposes and in a way which is not incompatible with those purposes;
 - 5.1.3 Adequate, relevant and not excessive for the purpose;
 - 5.1.4 Accurate and up to date;
 - 5.1.5 Not kept for any longer than is necessary for the purpose; and
 - 5.1.6 **Processed** securely using appropriate technical and organisational measures.
- 5.2 **Personal Data** must also:
 - 5.2.1 be **processed** in line with **data subjects'** rights;
 - 5.2.2 not be transferred to people or organisations situated in other countries without adequate protection.
- 5.3 We will comply with these principles in relation to any **processing of personal data** by the School.

6 Fair and lawful processing

- 6.1 Data Protection Legislation is not intended to prevent the **processing of personal data**, but to ensure that it is done fairly and without adversely affecting the rights of the **data subject**.
- 6.2 For **personal data** to be **processed** fairly, **data subjects** must be made aware:
 - 6.2.1 that the **personal data** is being **processed**;

- 6.2.2 why the **personal data** is being **processed**;
 - 6.2.3 what the lawful basis is for that **processing** (see below);
 - 6.2.4 whether the **personal data** will be shared, and if so with whom;
 - 6.2.5 the period for which the **personal data** will be held;
 - 6.2.6 the existence of the **data subject's** rights in relation to the **processing** of that **personal data**; and
 - 6.2.7 the right of the **data subject** to raise a complaint with the Information Commissioner's Office in relation to any **processing**.
- 6.3 We will only obtain such **personal data** as is necessary and relevant to the purpose for which it was gathered, and will ensure that we have a lawful basis for any **processing**.
- 6.4 For **personal data** to be **processed** lawfully, it must be **processed** on the basis of one of the legal grounds set out in the Data Protection Legislation. We will normally **process personal data** under the following legal grounds:
- 6.4.1 where the **processing** is necessary for the performance of a contract between us and the **data subject**, such as an employment contract;
 - 6.4.2 where the **processing** is necessary to comply with a legal obligation that we are subject to, (e.g. the Education Act 2011) or the school's/academy's instrument of government or articles of association including the requirements of canon law.
 - 6.4.3 where the law otherwise allows us to **process** the **personal data** or we are carrying out a task in the public interest; and where we are not performing a public function and have a legitimate interest to process the personal data.
 - 6.4.4 where none of the above apply then we will seek the consent of the **data subject** to the **processing** of their **personal data**.
 - 6.4.5 where it is in anyone's vital interests to process personal data.
- 6.5 When **special category personal data** is being processed then an additional legal ground must apply to that processing. We will normally only **process special category personal data** under following legal grounds:
- 6.5.1 where the **processing** is necessary for employment law purposes, for example in relation to sickness absence;
 - 6.5.2 where the **processing** is necessary for reasons of substantial public interest, for example for the purposes of equality of opportunity and treatment;

- 6.5.3 where the **processing** is necessary for health or social care purposes, for example in relation to pupils with medical conditions or disabilities;
 - 6.5.4 where the purpose of the **processing** is for archiving, or historical research and statistical purposes; and
 - 6.5.5 where none of the above apply then we will seek the consent of the **data subject** to the **processing** of their **special category personal data**.
- 6.6 We will inform **data subjects** of the above matters by way of all of our appropriate privacy notices which shall be provided to them when we collect the data or as soon as possible thereafter, unless we have already provided this information such as at the time when a pupil joins us.
- 6.7 If any **data user** is in doubt as to whether they can use any **personal data** for any purpose then they must contact the DPO before doing so.

Vital Interests

- 6.8 There may be circumstances where it is considered necessary to **process personal data** or **special category personal data** in order to protect the vital interests of a **data subject**. This might include medical emergencies where the **data subject** is not in a position to give consent to the **processing**. We believe that this will only occur in very specific and limited circumstances. In such circumstances we would usually seek to consult with the DPO in advance, although there may be emergency situations where this does not occur.

Consent

- 6.9 Where none of the other bases for **processing** set out above apply then the school must seek the consent of the **data subject** before **processing** any **personal data** for any purpose.
- 6.10 There are strict legal requirements in relation to the form of consent that must be obtained from **data subjects**.
- 6.11 When pupils and or our Workforce join the School a consent form will be required to be completed in relation to them. This consent form deals with the taking and use of photographs and videos of them, amongst other things. Where appropriate third parties may also be required to complete a consent form. (See Online Safety policy appendix 2)
- 6.12 In relation to all pupils under the age of [12/13] years old we will seek consent from an individual with parental responsibility for that pupil.
- 6.13 If consent is required for any other **processing** of **personal data** of any **data subject** then the form of this consent must:
- 6.13.1 Inform the **data subject** of exactly what we intend to do with their **personal data**;

- 6.13.2 Require them to positively confirm that they consent - we cannot ask them to opt-out rather than opt-in; and
- 6.13.3 Inform the **data subject** of how they can withdraw their consent.
- 6.14 Any consent must be freely given, which means that we cannot make the provision of any goods or services or other matter conditional on a **data subject** giving their consent.
- 6.15 The DPO must always be consulted in relation to any consent form before consent is obtained.
- 6.16 A record must always be kept of any consent, including how it was obtained and when.

7 Processing for limited purposes

- 7.1 In the course of our activities as a School, we may collect and **process** the **personal data** set out in our Schedule of Processing Activities. This may include **personal data** we receive directly from a **data subject** (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and **personal data** we receive from other sources (including, for example, local authorities, Catholic parishes, the diocese and the Trustees other schools, parents, other pupils or members of our Catholic community and **workforce**).
- 7.2 We will only **process personal data** for the specific purposes set out in our Schedule of Processing Activities or for any other purposes specifically permitted by Data Protection Legislation or for which specific consent has been provided by the data subject.

8 Notifying data subjects

- 8.1 If we collect **personal data** directly from **data subjects**, we will inform them about:
 - 8.1.1 our identity and contact details as **Data Controller** and those of the DPO;
 - 8.1.2 the purpose or purposes and legal basis for which we intend to **process** that **personal data**;
 - 8.1.3 the types of third parties, if any, with which we will share or to which we will disclose that **personal data**;
 - 8.1.4 whether the **personal data** will be transferred outside the European Economic Area ('**EEA**') and if so the safeguards in place;
 - 8.1.5 the period for which their **personal data** will be stored, by reference to our Retention and Destruction Policy;
 - 8.1.6 the existence of any automated decision making in the **processing** of the **personal data** along with the significance and envisaged consequences of the **processing** and the right to object to such decision making; and

8.1.7 the rights of the **data subject** to object to or limit processing, request information, request deletion of information or lodge a complaint with the Information Commissioner's Office (ICO).

8.2 Unless we have already informed **data subjects** that we will be obtaining information about them from third parties (for example in our privacy notices), then if we receive **personal data** about a **data subject** from other sources, we will provide the **data subject** with the above information as soon as possible thereafter, informing them of where the **personal data** was obtained from.

Our Lady & All Saints Catholic Primary School will be provided with information relating to third parties in the form of emergency contact details. These individuals must be provided with the information above. Parents are required to obtain the consent of any third party whose details they provide to the School for these purposes, and we have provided an appropriately worded form for this purpose. (See Appendix 2 of this document)

9 Adequate, relevant and non-excessive processing

9.1 We will only collect **personal data** to the extent that it is required for the specific purpose notified to the **data subject**, unless otherwise permitted by Data Protection Legislation.

10 Accurate data

10.1 We will ensure that **personal data** we hold is accurate and kept up to date.

10.2 We will take reasonable steps to destroy or amend inaccurate or out-of-date data.

10.3 **Data subjects** have a right to have any inaccurate **personal data** rectified. See further below in relation to the exercise of this right.

11 Timely processing

11.1 We will not keep **personal data** longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all **personal data** which is no longer required.

12 Processing in line with data subject's rights

12.1 We will **process** all **personal data** in line with **data subjects'** rights, in particular their right to:

12.1.1 request access to any **personal data** we hold about them;

12.1.2 object to the **processing** of their **personal data**, including the right to object to direct marketing;

12.1.3 have inaccurate or incomplete **personal data** about them rectified;

12.1.4 restrict **processing** of their **personal data**;

12.1.5 have **personal data** we hold about them erased

12.1.6 have their **personal data** transferred.

The Right of Access to Personal Data

12.2 **Data subjects** may request, via e-mail or written request, access to all **personal data** we hold about them. Such requests will be considered in line with the schools Subject Access Request Procedure which can be found in Appendix 3 of this document. The School will respond to the request with fourteen working days, with the exception of requests made on the last day of the Summer term when the school will respond with twenty eight working days.

The Right to Object

12.3 In certain circumstances **data subjects** may object to us **processing** their **personal data**. This right may be exercised in relation to **processing** that we are undertaking on the basis of a legitimate interest or in pursuit of a statutory function or task carried out in the public interest.

12.4 An objection to **processing** does not have to be complied with where the school can demonstrate compelling legitimate grounds which override the rights of the **data subject**.

12.5 Such considerations are complex and must always be referred to the DPO upon receipt of the request to exercise this right.

12.6 In respect of direct marketing any objection to **processing** must be complied with.

12.7 The School is not however obliged to comply with a request where the **personal data** is required in relation to any claim or legal proceedings.

The Right to Rectification

12.8 If a **data subject** informs the School that **personal data** held about them by the School is inaccurate or incomplete then we will consider that request and provide a response within twenty eight working days.

12.9 If we consider the issue to be too complex to resolve within that period then we may extend the response period by a further two months. If this is necessary then we will inform the **data subject** within twenty eight days of their request that this is the case.

12.10 We may determine that any changes proposed by the **data subject** should not be made. If this is the case then we will explain to the **data subject** why this is the case. In those circumstances we will inform the **data subject** of their right to complain to the ICO at the time that we inform them of our decision in relation to their request.

The Right to Restrict Processing

- 12.11 **Data subjects** have a right to “block” or suppress the **processing of personal data**. This means that the School can continue to hold the **personal data** but not do anything else with it.
- 12.12 The School must restrict the **processing of personal data**:
- 12.12.1 Where it is in the process of considering a request for **personal data** to be rectified (see above);
 - 12.12.2 Where the School is in the process of considering an objection to processing by a **data subject**;
 - 12.12.3 Where the **processing** is unlawful but the **data subject** has asked the School not to delete the **personal data**; and
 - 12.12.4 Where the School no longer needs the **personal data** but the **data subject** has asked the School not to delete the **personal data** because they need it in relation to a legal claim, including any potential claim against School.
- 12.13 If the School has shared the relevant **personal data** with any other organisation then we will contact those organisations to inform them of any restriction, unless this proves impossible or involves a disproportionate effort.
- 12.14 The DPO must be consulted in relation to requests under this right.

The Right to Be Forgotten

- 12.15 **Data subjects** have a right to have **personal data** about them held by the School erased only in the following circumstances:
- 12.15.1 Where the **personal data** is no longer necessary for the purpose for which it was originally collected;
 - 12.15.2 When a **data subject** withdraws consent - which will apply only where the School is relying on the individuals consent to the **processing** in the first place;
 - 12.15.3 When a **data subject** objects to the **processing** and there is no overriding legitimate interest to continue that **processing** - see above in relation to the right to object;
 - 12.15.4 Where the **processing** of the **personal data** is otherwise unlawful;
 - 12.15.5 When it is necessary to erase the **personal data** to comply with a legal obligation; and
 - 12.15.6 If the School offers information regarding outreach services to a pupil and consent is withdrawn by said pupil in respect of that pupil in relation to those services.

12.16 The School is not required to comply with a request by a **data subject** to erase their **personal data** if the **processing** is taking place:

12.16.1 To exercise the right of freedom of expression or information;

12.16.2 To comply with a legal obligation for the performance of a task in the public interest or in accordance with the law;

12.16.3 For public health purposes in the public interest;

12.16.4 For archiving purposes in the public interest, research or statistical purposes; or

12.16.5 In relation to a legal claim.

12.17 If the School has shared the relevant personal data with any other organisation then we will contact those organisations to inform them of any erasure, unless this proves impossible or involves a disproportionate effort.

12.18 The DPO must be consulted in relation to requests under this right.

Right to Data Portability

12.19 In limited circumstances a **data subject** has a right to receive their **personal data** in a machine readable format, and to have this transferred to other organisations.

12.20 If such a request is made then the DPO must be consulted.

13 Data security

13.1 We will take appropriate security measures against unlawful or unauthorised processing of **personal data**, and against the accidental loss of, or damage to, **personal data**.

13.2 We will put in place procedures and technologies to maintain the security of all **personal data** from the point of collection to the point of destruction.

13.3 Security procedures include:

13.3.1 **Entry controls.** Any stranger seen in entry-controlled areas should be reported to the head teacher.

13.3.2 **Secure lockable desks and cupboards.** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)

13.3.3 **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required. IT assets must be disposed of in accordance with the Information Commissioner's Office guidance on the disposal of IT assets.

- 13.3.4 **Equipment.** Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.
 - 13.3.5 **Working away from the school premises - paper documents.** Staff, Governors and any other workforce should ensure that all paper documents are stored securely and not in public view whilst working away from School premises. Governor's meeting papers which contain personal data (specific to school or workforce) should be handed back at the close of each meeting for destruction as noted on the agenda.
 - 13.3.6 **Working away from the school premises - electronic working.** Staff, Governors and other workforce should only work from a password protected network. All electronic communications should be encrypted via an encrypted mail service. Staff should ensure they follow the online safety policy when using personal devices to open documents.
 - 13.3.7 **Document printing.** Documents containing **personal data** must be collected immediately from printers and not left on photocopiers.
- 13.4 Any member of the workforce found to be in breach of the above security measures may be subject to disciplinary action.

14 Data Protection Impact Assessments

- 14.1 The School takes data protection very seriously, and will consider and comply with the requirements of Data Protection Legislation in relation to all of its activities whenever these involve the use of personal data, in accordance with the principles of data protection by design and default.
- 14.2 In certain circumstances the law requires us to carry out detailed assessments of proposed **processing**. This includes where we intend to use new technologies which might pose a high risk to the rights of **data subjects** because of the types of data we will be **processing** or the way that we intend to do so.
- 14.3 The School will complete an assessment of any such proposed **processing** and will ensure that all relevant matters are considered.
- 14.4 The DPO should always be consulted as to whether a data protection impact assessment is required, and if so how to undertake that assessment.

15 Disclosure and sharing of personal information

- 15.1 We may share **personal data** that we hold about **data subjects**, and without their consent, with other organisations. Such organisations include the Department for Education, Ofsted, health authorities and professionals, the Local Authority, examination bodies, other schools, The Diocese and the Trustees and other organisations where we have a lawful basis for doing so.
- 15.2 The School will inform **data subjects** of any sharing of their **personal data** unless we are not legally required to do so, for example where **personal data** is shared with the police in the investigation of a criminal offence.

- 15.3 In some circumstances we will not share safeguarding information. Please refer to our Child Protection Policy.

16 Data Processors

- 16.1 We contract with various organisations who provide services to the School, including:
- 16.1.1 Lancashire County Council (payroll, Oracle, HR recruitment, School Advisor), Lancashire Catering Services (Children and staff who have a school lunch, payroll for their staff), WLSSP (All children class lists for assessment, emergency contacts for sporting events, next of kin), NHS services (school nurse, CamHs, Speech and Lang)
- 16.2 In order that these services can be provided effectively we are required to transfer **personal data** of **data subjects** to these **data processors**.
- 16.3 **Personal data** will only be transferred to a **data processor** if they agree to comply with our procedures and policies in relation to data security, or if they put in place adequate measures themselves to the satisfaction of the School. The School will always undertake due diligence of any **data processor** before transferring the **personal data** of **data subjects** to them.
- 16.4 Contracts with **data processors** will comply with Data Protection Legislation and contain explicit obligations on the **data processor** to ensure compliance with the Data Protection Legislation, and compliance with the rights of **Data Subjects**.

17 Images and Videos

- 17.1 Parents and others attending School events are allowed to take photographs and videos of those events for domestic purposes. For example, parents can take video recordings of a school performance involving their child. The School does not prohibit this as a matter of policy.
- 17.2 The School does not however agree to any such photographs or videos being used for any other purpose, but acknowledges that such matters are, for the most part, outside of the ability of the School to prevent.
- 17.3 The School asks that parents and others do not post any images or videos which include any child other than their own child on any social media or otherwise publish those images or videos.
- 17.4 As a Catholic School we want to celebrate the achievements of our pupils and therefore may want to use images and videos of our pupils within promotional materials, or for publication in the media such as local, or even national, newspapers covering school events or achievements. We will seek the consent of pupils, and their parents where appropriate, before allowing the use of images or videos of pupils for such purposes.
- 17.5 Whenever a pupil begins their attendance at Our lady and All Saints Catholic Primary School their parent/guardian will be asked to complete a consent form in relation to the use of images and videos of that pupil. We will not use images or videos of pupils for any purpose where we do not have consent.

18 Changes to this policy

We may change this policy at any time. Where appropriate, we will notify **data subjects** of those changes.

Appendix 1:

Definition of terms

Term	Definition
Data	is information which is stored electronically, on a computer, or in certain paper-based filing systems
Data Subjects	for the purpose of this policy include all living individuals about whom we hold personal data. This includes pupils, our workforce, staff, and other individuals. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information
Personal Data	means any information relating to an identified or identifiable natural person (a data subject); an identifiable natural 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, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
Data Controllers	are people or organisations determining the purposes for, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with Data Protection Legislation. Our Lady & All Saints Catholic Primary School are the data controller of all personal data
Data Users	are those of our workforce (including Staff, Governors and volunteers) whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times
Data Processors	include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions
Processing	is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data 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. Processing also includes transferring personal data to third parties
Special Category Personal Data	includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or biometric data
Workforce	Includes, any individual employed by Our Lady & All saints Catholic Primary School such as staff and those who volunteer in any capacity including Governors, Trustees or parent helpers.

Appendix 2: PUPIL CONTACT & INFORMATION SHEET

Surname of Pupil: _____

Forename(s): _____

Date of Birth: _____

Home telephone number: _____

Address, including postcode:

UPN: _____

E-mail address: _____

Emergency contact phone numbers

Mother: _____

Father: _____

Other (State relationship): _____

By ticking this box you confirm you have sought permission from people in your emergency contacts and they have agreed to share their information with our school.

Family Doctor (address and phone number): _____

Medical Information:

(eg eyesight, hearing, speech, movement, allergies or conditions such as epilepsy, diabetes, heart conditions, asthma)

Any Medication required:

Appendix 3

DATA SUBJECT ACCESS REQUEST PROCEDURE

This procedure sets out the key features regarding handling or responding to requests for access to personal data made by data subjects, their representatives or other interested parties. This procedure will enable Our lady and All Saints Catholic Primary School to comply with legal obligations, provide better holistic care, improve transparency, enable individuals to verify that information held about them is accurate, and increase the level of trust by being open with individuals about the information that is held about them. This procedure applies to employees that handle data subject access requests such as the Data Protection Officer.

The rights to **data subject** access include the following:

- Know whether a data controller holds any personal data about them.
- Receive a description of the data held about them and, if permissible and practical, a copy of the data.
- Be informed of the purpose(s) for which that data is being processed, and from where it was received.
- Be informed whether the information is being disclosed to anyone apart from the original recipient of the data; and if so, the identity of those recipients.
- The right of data portability. Data subjects can ask that their personal data be transferred to them or a third party in machine readable format (Word, PDF, etc.). However, such requests can only be fulfilled if the data in question is: 1) provided by the data subject to School, 2) is processed automatically and 3) is processed based on consent or fulfilment of a contract.

In order to be able to respond to the Data Subject Access Requests in a timely manner, the data subject should:

- Submit his/her request using a Data Subject Access Request letter which can be found below.
- Provide the Company with sufficient information to validate his/her identity (to ensure that the person requesting the information is the data subject or his/her authorised person).

In principle, Our Lady & All Saints Catholic Primary School will not normally disclose the following types of information in response to a Data Subject Access Request:

- Information about other people – A Data Subject Access Request may cover information which relates to an individual or individuals other than the data subject. Access to such data will not be granted, unless the individuals involved consent to the disclosure of their data.
- Repeat requests – Where a similar or identical request in relation to the same data subject has previously been complied with within a reasonable time period, and where there is no significant change in personal data held in relation to that data subject, any further request made within a six month period of the original request will be considered a repeat request
- Publicly available information – The Company is not required to provide copies of documents which are already in the public domain.

Should data subjects wish to request information, they can use the template letter given below:

Letter template

[Your full address]

[Phone number]

[The date]

[Name and address of the organisation]

Dear Headteacher,

Subject access request

[Your full name and address and any other details to help identify you and the data you want.]

Please supply the data about me that I am entitled to under data protection law relating to: [give specific details of the data you want, for example:

- my personnel file
- emails between 'person A' and 'person B' (from 1 June 2017 to 1 Sept 2017)
- my medical records (between 2014 and 2017) held by 'Dr C' at 'hospital D'
- CCTV camera situated at ('location E') on 23 May 2017 between 11am and 5pm
- copies of statements (between 2013 and 2017) held in account number xxxxx.]

If you need any more data from me, or a fee, please let me know as soon as possible. It may be helpful for you to know that data protection law requires you to respond to a request for data within twenty-eight working days.

If you do not normally deal with these requests, please pass this letter to your DataProtection Officer – Mrs. Jessica Watson. If you need advice on dealing with this request, the Information Commissioner's Office can assist you. Its website is ico.org.uk or it can be contacted on 0303 123 1113.

Yours faithfully

[Signature]