

THE MARIST SCHOOL



Data Protection and GDPR Policy

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Signed:

Ann Nash
Chair of Governors

Karl McCloskey
Principal

The charity of the order of the Marist Sisters Province of England (charity no. 225485) aims to promote and provide for the advancement of education by conducting and governing a day school for girls in England. The teaching shall be in full accordance with the Roman Catholic Church.

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1. Policy statement

- 1.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities as a school we will collect, store and process personal data and we recognise that the correct and lawful treatment of this data will maintain confidentiality in the school and will provide for successful operation of our educational endeavours.
- 1.2 Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

2. Safeguarding

- 2.1 Whilst organisations and individuals have a duty to process personal data fairly and lawfully, data protection is not a barrier to sharing information where the failure to do so would result in a child or young person being placed at risk of harm.
- 2.2 Where safeguarding or child protection concerns arise, we will act in the interests of the child or young person. In such circumstances, ensuring the well-being of the child or young person may involve sharing confidential information with relevant child protection bodies. For further guidance, please see the government's non-statutory advice [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers](#). If in doubt, please consult the Chief Inspector. Please also see Annex C below in relation to THE MARIST SCHOOL's approach to handling special category data at The Marist Schooling from safeguarding concerns.

3. About this policy

- 3.1 The types of personal data that The Marist School or those acting on our behalf (We) may be required to handle include information about current, past and prospective employees, directors, inspectors or other contractors, suppliers, parents, pupils/students and staff from schools and further education institutions, public bodies and other third parties that we communicate with. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the GDPR and the associated UK data protection legislation ("Associated UK legislation") and other regulations.
- 3.2 This policy and any other documents referred to in it sets 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.
- 3.3 This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data.
- 3.4 The Data Protection Officer is responsible for ensuring compliance with the GDPR and the Associated UK 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 Data Protection Officer (officesenior@the.marist.com).

4. Definition of data protection terms

- 4.1 **Data** is information which is stored electronically, on a computer, or in certain paper-based filing systems.
- 4.2 **Data subjects** for the purpose of this policy include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.
- 4.3 **Personal data** means data relating to a living individual who can be directly or indirectly identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour. Personal data also includes online identifiers and location data. Personal data that has been pseudonymised may be personal data, depending on how difficult it is to attribute the pseudonym to a particular individual.
- 4.4 **Data controllers** are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with the GDPR and the Associated UK legislation. THE MARIST SCHOOL is the data controller of all personal data used in our business for our own inspection and commercial purposes. In relation to any personal data processed for the purpose of school inspections, THE MARIST SCHOOL will be a data controller, as will the relevant school inspector.
- 4.5 **Data users** are those of our employees and contractors 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.
- 4.6 **Data processors** include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition but it would include directors and/or suppliers who handle personal data on THE MARIST SCHOOL's behalf.
- 4.7 **Processing** is any activity that involves use of the personal data. It includes obtaining, recording or holding the personal data, or carrying out any operation or set of operations on the personal data including organThe Marist Schooling, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
- 4.8 **Special category personal data** is sensitive data, which includes personal data concerning a person's health, sex life or sexual orientation or personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union memberships, and genetic or biometric data.

5. Principles relating to processing of personal data

- 5.1 Anyone processing personal data must comply with the six enforceable principles of good practice. These provide that personal data must be:

- 5.1.1 Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- 5.1.2 Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 5.1.3 Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 5.1.4 Accurate and, where necessary, kept up to date.
- 5.1.5 Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- 5.1.6 Secure, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6. Lawful, fair and transparent processing

6.1 The GDPR and the Associated UK legislation are 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. For personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the GDPR and the Associated UK legislation. These include, among other grounds: the data subject's consent to the processing; the processing is necessary for the performance of a contract with the data subject; the 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; for the compliance with a legal obligation to which the data controller is subject; or for the legitimate interest of the data controller or the party to whom the data is disclosed. When special category personal data is being processed, additional conditions must be considered. Please refer to Annex C for information. When processing personal data as data controllers in the course of our operations, we will ensure that those requirements are met. The Marist School relies on different legal grounds depending on the category of personal data being processed. Each new category of data is reviewed on a case-by-case basis. Please see Annex B for details.

6.1.1. For The Marist School to rely on consent, it must be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her, such as a written statement or an oral statement. When the processing has multiple purposes, consent should be given for each of them. If the data subject's consent is to be given following a request by electronic means, the request must be clear, concise and not unnecessarily disruptive to the use for which it is provided.

6.1.2. For The Marist School to rely on the legitimate interests ground, The school must balance these against the interests or fundamental rights and freedoms of the data subject, taking into consideration the reasonable expectations of data subjects based on their relationship with the controller.

6.2 Any information and communications addressed to a child/young person should be in such a clear and plain language that the child/young person can easily understand.

7. Processing for specified, explicit and legitimate purposes

7.1 In the course of our business, we may collect and process a range of personal data. This may include 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 data we receive from other sources (including, for example, public bodies, schools, associations, parents, pupils, inspectors, sub-contractors, payment and delivery services, credit reference agencies and others).

7.2 We will only process personal data for the specific purposes set out in Annexes A, B, and C or for any other purposes specifically permitted by the GDPR and the Associated UK legislation.

8. Adequate, relevant and limited to what is necessary

8.1 We will only collect personal data to the extent that it is required for inspection or another specific purpose notified to the data subject. The processing of personal data for purposes other than those for which the personal data were initially collected will be allowed only where the processing is compatible with the purposes for which the personal data were initially collected.

9. Accurate data

9.1 We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate data.

10. Timely processing and record keeping

10.1 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 data which is no longer required in line with the retention schedule at Annex B.

10.2 The Marist School maintains a record of processing activities under its responsibility. This record includes: the purposes of the processing; a description of the categories of data subjects and of the categories of personal data; the categories of recipients to whom the personal data have been or will be disclosed including recipients in third countries or international organisations; where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in certain circumstances, the documentation of suitable safeguards; where possible, the envisaged time limits for erasure of the different categories of data; and, where possible, a general description of the technical and organisation security measures.

11. Data security

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

11.2 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. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place alternative adequate measures himself.

11.3 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

11.3.1 **Confidentiality** means that only people who are authorised to use the data can access it, but see also clause 2 above and Annex C below.

11.3.2 **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.

11.3.3 **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on The Marist School's central computer system or in office filing cabinets instead of individual PCs or home offices, once inspection activity is over.

12. Security procedures include

12.1.1 **Entry controls.** Entrance to The Marist School is by entrance phone and security- pad. Any stranger seen in entry-controlled areas should be reported to Reception.

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

12.1.3 **Methods of disposal.** Paper documents containing confidential information, such as personal data, should be shredded. Digital storage devices should be physically destroyed when they are no longer required.

12.1.4 **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.

12.1.5 **Network security.** Passwords for access to the company network of The Marist School online portals are confidential and must not be revealed to anyone else. The Principal and Bursar must be informed of any concerns that a password has been compromised. A password reset will be arranged.

All software installations, downloads, CDs or USB sticks must be authorised by the Network Manager before they are used on any network PC or laptop.

The antivirus software on school PCs updates automatically.

The Marist School reserves the right to regularly audit school PCs and servers to monitor content stored on them and to monitor the performance of the network.

All actual or suspected breaches of security to the network, or any system problems are to be immediately reported to the Network Manager who will inform the Principal.

12.1.6 **Deletion of unnecessary or irrelevant data.** Please see Annex B.

12.1.7 **Additional security measures in relation to special category data.** Please see Annex C.

13. Personal data breach response

In the case of a personal data breach, The Marist School shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the Information Commissioner's Office, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the ICO is not made within 72 hours, it shall be accompanied by reasons for the delay. It may also be necessary to communicate the breach to relevant data subjects. A data breach response policy has been provided to The Marist School employees and inspectors.

14. Processing and notifying in line with data subject's rights

14.1 If we collect personal data directly from data subjects, it shall be transparent to data subjects that personal data concerning them is collected, used, consulted or otherwise processed and the extent to which the personal data is or will be processed.

14.2 Any information and communication relating to the processing of personal data shall be easily accessible and easy for data subjects to understand, and clear, concise and plain language will be used.

14.3 If we collect personal data directly from data subjects, we will inform them about:

14.3.1 Our identity and contact details.

14.3.2 The purpose or purposes for which we intend to process their personal data and the legal basis for the processing. This will include, where relevant, details of the legitimate interests we are pursuing.

14.3.3 The types of third parties, if any, with which we will share or to which we will disclose that personal data.

- 14.3.4 Where applicable, the fact that we intend to transfer personal data to a third country or international organisation.
 - 14.3.5 The period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period.
 - 14.3.6 The existence of the right to request from The Marist School access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability.
 - 14.3.7 The right to withdraw consent, if consent is the lawful ground being relied upon for processing. To withdraw consent, data subjects can contact The Marist School via email: officesenior@themarist.com; by phoning: 01392 624291 or by writing to: Data Protection Officer, The Marist School, Kings Road, Sunninghill, Ascot, Berkshire SL5 7PS.
 - 14.3.8 The right to lodge a complaint with a supervisory authority.
 - 14.3.9 Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data.
 - 14.3.10 The right to request information as to the source of the personal data where it has not been collected from the data subject.
- 14.4 If we receive personal data about a data subject from other sources, such as in the course of inspection activity, it will be retained for no longer than necessary, in accordance with Annex B. Thereafter it will be deleted or destroyed confidentially.
- 14.5 Except where personal data is processed in the course of inspection activity, we will also inform data subjects whose personal data we process that we are the data controller with regard to that data, and who the Data Protection Officer is.
- 15. Dealing with subject access requests and requests for rectification and erasure**
- 15.1 Data subjects may make a formal request in relation to personal data we hold about them.
- 15.2 Policies about how to respond to a subject access requests and requests for rectification and erasure of personal data have been provided to The Marist School employees and inspectors.
- 15.3 The Marist School shall provide information in response to a subject access request without undue delay and in any event within one month of receipt of the request. This period may be extended by two further months where necessary, taking into account the complexity of the request. If The Marist School does not take action on the request of the data subject, The Marist School shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

16. Transferring personal data to a country outside the EEA

- 16.1 We may transfer any personal data we hold to a country outside the European Economic Area ("EEA"), provided that one of the following conditions applies:
- 16.1.1 The country to which the personal data is transferred ensures an adequate level of protection for the data subjects' rights and freedoms.
 - 16.1.2 The data subject has given his consent.
 - 16.1.3 The transfer is necessary for one of the reasons set out in the GDPR and the Associated UK legislation, including the performance of a contract between us and the data subject.
 - 16.1.4 The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
 - 16.1.5 The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.
- 16.2 Subject to the requirements in clause 11.1 above, personal data we hold may also be processed by staff, inspectors, suppliers, contractors, schools operating outside the EEA, or those providing support services to them.

17. Disclosure and sharing of personal data

- 17.1 We may share personal data we hold with any member of our group, which includes our subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- 17.2 We may also disclose personal data we hold to third parties:
- 17.2.1 In the event that we sell or buy any business or assets, in which case we may disclose personal data we hold to the prospective seller or buyer of such business or assets.
 - 17.2.2 If we or substantially all of our assets are acquired by a third party, in which case personal data we hold will be one of the transferred assets.
 - 17.2.3 If we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the data subject or other agreements; or to protect our rights, property, or the safety of children at the schools we inspect, our employees, contractors, inspectors, or others. This includes exchanging information with other companies, organisations and public bodies for the purposes of child protection, prevention or detection of crime, fraud protection and credit risk reduction.

18. Changes to this policy

- 18.1 We reserve the right to change this policy at any time. When we make significant changes we will notify our staff and inspectors via email unless specifically agreed otherwise.

Annex A - Specified purposes for which The Marist School will process personal data:

- (a) To promote and safeguard the health, welfare and safety of children and young people. Within this category The Marist School will process personal data in order to receive and log concerns raised by parents, pupils, school staff and others and where necessary refer to or liaise with the Department for Education and/or the police and/or local authorities and/or other relevant third parties.
- (b) To establish and maintain the resources and infrastructure required to deliver a high quality education to its pupils. Within this category, The Marist School will process personal data in order to
 - a. engage employees, workers, contractors, directors and other office holders (prospective, current and past) and carry out related activities including: personnel record keeping and management; payroll and pensions; employee benefits; recruitment; training and professional development; performance management; succession planning; and other associated tasks;
 - b. build and manage external relationships and carry out business development;
 - c. carry out sector research and development;
 - d. fulfil contractual and legal requirements.

Annex B – Legal Basis and Retention Schedule

Category	Legal basis for collection	Type of document / information	Retention instructions for THE MARIST SCHOOL office	Retention instructions for inspectors
Safeguarding concerns	Substantial public interest	Notes, emails, saved documents relating to safeguarding concerns, including referrals to and correspondence with the DfE, local authority, police, other agencies.	<p>RETAIN PENDING THE OUTCOME OF THE INDEPENDENT INQUIRY INTO CHILD SEXUAL ABUSE (IICSA). <u>Where a document is potentially relevant to IICSA it should be retained and The Marist School usual document retention timeframes (as set out below) will not apply. If in doubt, please consult the Regulatory and Policy Team.</u></p> <p><u>Please also see Annex C below.</u></p>	If you hold anything on file that has not already been sent in, send it in to The Marist School office as soon as possible or contact The Marist School office.
Inspection evidence	Public interest Legal obligation	All documents, drafts, emails, paperwork, forms, notes, questionnaire responses, records of evidence and any other records including pre-inspection information and papers.	Retain securely for six months following publication of inspection report and then permanently delete/shred UNLESS there is an ongoing complaint; OR another specific reason to keep the records – i.e. records that could be relevant to IICSA should not be deleted (see above).	<p>See Data Protection FAQs (April 2017): All hard copy notes or documents should be returned to The Marist School office within six weeks of publication of the inspection report.</p> <p>Electronic documents should be retained by RIs or LIs (PFE) for six months from date of</p>

				publication of report then deleted permanently UNLESS there is an ongoing complaint / instructed otherwise by The Marist School office; TIs and other inspectors involved in an inspection can delete as soon as the report has been published and must have deleted by the six month point following publication.
Inspection reports	Public interest Legal obligation	Published inspection reports.	From September 2017, reports will remain publicly available on The Marist School website indefinitely . One electronic copy of all historic reports should be archived and kept for reference purposes indefinitely .	N/A

The Marist School personnel information	Contract	Staff contact details, DOB, next of kin, CVs / career history, declaration of interest form, contracts, vetting checks, appraisal / performance review.	Retain securely whilst the individual is an employee. Following the end of employment retain for six years and then permanently delete/shred.	N/A
The Marist School personnel information	Contract	Holiday forms, sickness forms, working from home record, appraisals.	Retain securely for six years and then permanently delete/shred.	N/A

The Marist School personnel information	Contract	Salary details, PAYE information, national insurance number & pension information.	Retain securely whilst the individual is an employee. Following the end of employment retain for six years and then permanently delete/shred (in line with usual Finance Team annual deletion/shredding timeframe).	N/A
The Marist School personnel information	Contract	Name and dates of employment.	Retain for 25 years following end of employment.	N/A
The Marist School recruitment	Consent	Unsuccessful applications and related paperwork.	Delete six months after date of rejection.	N/A
Schools	Public interest	The Marist School portal record (contains contact details for head + bursar).	Keep up to date details as long as school is inspected as The Marist School. Where a school is no longer to be inspected as The Marist School, Information Services team to strip any information relating to specific individuals within six months .	N/A
Complaints	Legitimate interest	Any documents, emails, notes, correspondence etc. relating to a complaint about The Marist School.	Retain for six years following date of closure of complaint and then permanently delete/shred.	Retain for six months following date of closure of complaint and then permanently delete.
General correspondence	Legitimate interest	Routine day-to-day correspondence - i.e. emails, letters, notes of meetings and phone calls.	Review and delete or file on an annual basis - only keep information that is still needed for The Marist School purposes - i.e. ongoing communications, useful reference emails, records of decisions etc. All superfluous information should be deleted.	Review and delete or file on an annual basis - only keep information that is still needed for THE MARIST SCHOOL purposes - i.e. ongoing communications, useful reference emails, records of decisions

				etc. All superfluous information should be deleted.
Queries from schools	Legitimate interest	Support box queries and other queries from schools.	Retain for six years and then permanently delete unless the information is still required for a specific purpose.	N/A
School account information	Legitimate interest	Invoicing / payment details.	Retain securely for six years and then permanently delete/shred.	N/A
Governing Body documentation	Consent/ Legitimate interest	Information about board members and board meeting paperwork.	Retain securely for six years and then permanently delete/shred.	N/A
The Marist School personnel information	Contract	The Marist School staff network logins and profiles (including record of use of internet and The Marist School systems).	Retain securely for six years and then permanently delete.	N/A
The Marist School personnel information	Contract	The Audit Log - The Marist School staff remote access record.	Retain securely for six years and then permanently delete.	N/A
The Marist School personnel information	Contract	The Marist School phone call records.	Retain securely for six years and then permanently delete.	N/A
Photos and videos	Consent	Stock images and videos used in THE MARIST SCHOOL materials and training.	Ensure that relevant permissions / licences are sought for new images. Delete once no longer required for original purpose.	N/A

ANNEX C – Special category data

1. At The Marist School we make sure the welfare of all students is looked after and all students are protected from harm, The Designated Safeguarding Leads and the whole staff team work with students, teachers and families to meet this aim. The Designated Safeguarding Leads are available as a point of contact for parents, teachers, pupils and other stakeholders to express any concerns in relation to The Marist School . Such contact may be made via phone or email. Concerns may include personal data, and this may include special category personal data. Appropriate security measures are in place to ensure such information is only accessible by relevant individuals.

2. Substantial public interest

2.1 The collection of personal data relating to safeguarding concerns is considered by The Marist School to be in the substantial public interest.

2.2 The Marist School acknowledges that in some circumstances the information provided to The Marist School in relation to safeguarding concerns includes special category personal data about individuals who are not aware of The Marist School processing. It is unlikely to be appropriate for The Marist School to inform such individuals as doing so could disrupt The Marist School management of concerns.

2.3 The Associated UK legislation outlines that processing of personal information relating to individuals who are not aware of this processing can go ahead if the safeguarding derogation is met. The Marist School processing meets with the Associated UK legislation's requirements as it is necessary to protect an individual under the age of 18 from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual, and the processing is necessary for reasons of substantial public interest. The processing is carried out without the consent of the data subject because: (a) in the circumstances, consent to the processing cannot be given by the data subject; (b) in the circumstances, The Marist School cannot reasonably be expected to obtain the consent of the data subject to the processing; or (c) the processing must be carried out without the consent of the data subject because obtaining the consent of the data subject would prejudice the provision of the protection of the individual raising the concern.

2.4 However, The Marist School operates a personal data minimisation approach. The Marist School requests that if personal data is provided to us in relation to individuals who are not aware of the processing, the information is kept to what is strictly necessary, and redacted where possible.

3. Security of special category data

3.1 Portal – “My Concern” section:

3.1.1 This area contains special category information about children, teachers, parents and other individuals.

3.1.2 Reporting rights will be limited to those who require access: the Designated Safeguarding Leads, the Bursar and Executive PA.