

## Data Protection Policy

*A copy of this policy is published in the following areas:  
The school's website*

Date created: October 2016, Reviewed May 2018

Date for review: May 2019

Created by: Mark Vanstone, Director of Studies

### **A. Related Truro School Policies**

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This policy is intended to ensure that personal data is dealt with correctly and securely, in accordance with the General Data Protection Regulation, which takes effect on 25 May 2018, and other related legislation. It should be read along with the following policies:

- Admissions Policy;
- Complaints Policy;
- E-Safety Policy;
- School Network and Internet Acceptable Use Policy;
- Mobile Devices Policy;
- Data Protection Policy.
- Data Retention Policy.
- Staff Privacy Notice.
- General Privacy Notice.

### **B. Introduction and Purpose**

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Truro School needs to collect and use data about staff, pupils, parents, volunteers and other individuals who come into contact with the school. In collecting and using the data, Truro School is committed to protecting data subject's rights and ensuring it complies with the principles as set out in the General Data Protection Regulations (GDPR) which takes effect on 25 May 2018.

Truro School is registered as a Data Controller, with the Information Commissioner's Office (ICO). Truro School is part of the MIST Group of schools, each of which are registered Data Controllers in their own right. This policy is for Truro School (including Truro School Prep, Truro School Enterprises, Truro School Foundation and Truro School Former Pupils' Association).

This policy applies to all staff (paid or volunteer), consultants and processors engaged by Truro School. The policy's scope includes all personal data and special category data collected, used, stored, or shared by Truro School whether it is in digital or physical formats, including databases, emails, websites.

This policy does not form part of the formal employment contract for Truro School staff, it does, however, sit alongside all employment contracts and it is required that all staff will follow the policy. Failure to do so may result in disciplinary action.

## **C. Responsibilities**

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Truro School is registered as a Data Controller with the ICO. It has a legal responsibility to comply with GDPR and other regulations/legislation dealing with data protection.

As a Data Controller, Truro School determines the purposes and means of the processing of personal data.

## **D. What is Personal Data / Personal Information?**

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Personal data means any information relation to an identified or identifiable natural person (data subject) whether directly or indirectly. For example; Name, email address, telephone number, address, IP address etc.

Special category data includes data relating to race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life, or sexual orientation of a data subject.

## **E. GDPR's Six Data Processing Principles.**

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GDPR establishes six data processing principles that must be adhered to at all times. These principles require that personal data shall 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. Retained only for as long as necessary; and
6. Processed in an appropriate manner to maintain security.

GDPR also includes an 'accountability' principle, which requires that not only must Data Controllers comply with these data processing principles, they must also be able to demonstrate their compliance with them.

## **F. General Statement**

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Truro School is committed to complying with the above principles. To that end, Truro School will:

- Inform individuals why the information is being collected when it is collected via privacy notices. The Truro School Privacy Notice can be found under the policies section of the school web site at: <https://www.truroschoold.com/truro-senior-school/senior-school-policies/>
- Inform individuals when their information is shared, and why and with whom it was shared;
- Check the quality and the accuracy of the information it holds;
- Ensure that information is not retained for longer than is necessary;
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely;
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded;
- Share information with others only when it is legally appropriate to do so;

- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Data Subject Access Requests; and
- Ensure that Truro School staff receive appropriate training and guidance.

## **G. Data Subjects' Rights**

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Truro School is committed to ensuring that it complies with the eight rights given to data subjects under GDPR wherever possible. These rights are:

1. Right of to be informed;
2. Right of access;
3. Right of rectification;
4. Right of erasure;
5. Right to restricted processing;
6. Right of data portability;
7. Right to object; and
8. Rights in relation to automated decision making and profiling.

## **H. Data Subject Access Requests**

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All data subjects have a right to access their personal data (see above). Truro School has a DSARs policy which can be accessed on [www.truroschoo.com](http://www.truroschoo.com).

## **I. Complaints**

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All data subjects have a right to complain to the ICO. The ICO does recommend seeking to resolve any issues with the data controller initially prior to any referral. If data subjects have queries about this policy or about how Truro School processes personal data or if a data subject wishes to exercise any of the rights under applicable law, please contact either the Headmaster ([headmaster@truroschoo.com](mailto:headmaster@truroschoo.com)) or the Director of Studies ([dataprotect@truroschoo.com](mailto:dataprotect@truroschoo.com)).

## **J. Review**

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This policy will be reviewed annually.

## **K. Contacts**

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If you have any enquires in relation to this policy, please contact the Headmaster ([headmaster@truroschoo.com](mailto:headmaster@truroschoo.com)) or the Director of Studies ([dataprotect@truroschoo.com](mailto:dataprotect@truroschoo.com)).

Further advice and information is available from the Information Commissioner's Office, [www.ico.gov.uk](http://www.ico.gov.uk) or telephone 01625 545745