DATA PROTECTION POLICY: GUIDANCE NOTE

This guidance is intended to be read in conjunction with the data protection policy (when implementing and finalising the policy). The guidance is not intended for staff, parents or other third parties to view once they receive a copy of this policy.

References to School

Please do feel free to edit references to "school" within the policy to refer to Trust/Academy/Cluster/Federation.

Highlighted parts of the policy

The school should complete the highlighted sections within the policy.

Record of Processing Activities

The policy confirms that the School records their reasons for processing data. This is a new requirement under the GDPR. We have a template document and guidance to enable you to do this which can be found on our online portal.

Links to Other Data-Related Policies

There are references to other data-related policies within this policy. If you do not currently have those policies they can be removed. If you do have those policies please remove the square brackets and change the colour font from blue to black.

Automated Decision Making (Section 5)

Generally Schools do not carry out automated decision making. An example would be where schools use online algorithms or time management performance systems which are not monitored or evaluated by individuals – i.e. that the results are generated solely by automation.

Assuming you do not use automated processing or decision making then this section can be removed from your policy. However if you do carry out automated decision making or processing we would suggest seeking advice from us before inserting this into the policy.

Subject Access Requests (Appendix 1)

The new data protection policy now refers to a detailed subject access request procedure at Appendix 1. This is following recent guidance from the ICO who have recommended it to be good practice to have such a detailed procedure.

Within this appendix is a section about receiving requests during or just before school closure periods. This is because many schools are unable to/have difficulty in responding to requests during this time. To ensure transparency with those individuals who may make a request, schools are recommended to publicise the policy on the school's website.

Acknowledgement of reading the policy

We would suggest obtaining written confirmation from staff that they have read and understood the policy. This can be by email (or any other method you have to ensure staff acknowledge reading the policy). If you would prefer to insert this at the conclusion of the policy this can be done with this wording: -

I can confirm that I have read this policy and understand its contents

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Name   Date