

# The Den



## GDPR POLICY

The Den's aim is to ensure that all personal data collected about staff, pupils and parents is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill.

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

**Data protection officer** = Mrs Pauline Barritt

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

The DPO is also the first point of contact for individuals whose data The Den processes.

- Collecting, storing and processing any personal data in accordance with this policy
- Informing The Den of any changes to their personal data, such as a change of address.

### **Data Protection Principles**

The GDPR is based on data protection principles that The Den must comply with.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how The Den aims to comply with these principles.

### **Collecting Personal Data**

Data is processed for legitimate reasons such as:

The data needs to be processed so that The Den can fulfil a contract with the individual, or the individual has asked The Den to take specific steps before entering into a contract.

The data needs to be processed so that The Den can comply with a legal obligation

The data needs to be processed to ensure the vital interests of the individual e.g. to protect someone's life.

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data. If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

### **Sharing Personal Data**

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies - we will seek consent as necessary before doing this
- We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:
  - The prevention or detection of crime and/or fraud
  - The apprehension or prosecution of offenders
  - In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

### **Photographs & Videos**

As part of The Den's activities, we may take photographs and record images of individuals within the club house.

We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will

clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.

Uses may include:

Within the club house notice boards and in the Den's leaflet, newsletters, etc.

Online on our school website

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

See our Child Protection and Safeguarding Policy for more information on our use of photographs and videos.

### **Data Security & Storage of Records**

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept locked when not in use

Papers containing confidential personal data must not be left on office and club house desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access

Passwords are used to access The Den's computers.

Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices where personal information is stored

Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected.

### **Disposal of Records**

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files.

### **Personal Data Breaches**

The Den will make all reasonable endeavours to ensure that there are no personal data breaches.

However, if this was to occur parents/careers and staff would be notified within 48hrs of the breach.

### **Monitoring Arrangements**

This policy will be reviewed and updated if necessary when the Data Protection Bill receives royal assent and becomes law (as the Data Protection Act 2018) - if any changes are made to the bill that affect The Den's practice. Otherwise, or from then on, this policy will be reviewed every 2 years and shared with staff and parents.

Updated May 2023 by Pauline Barritt Manager.