

DATA PROTECTION AND CONFIDENTIALITY POLICY	Prepared By	HR - Admin
	Issued By	HR Department
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D35: DATA PROTECTION AND CONFIDENTIALITY POLICY

1. Rationale:

The Edison Group of Schools' Data Protection and Confidentiality Policy sets out its commitment to protecting personal data and confidential information and the implementation of that commitment concerning the collection, storage, use and disclosure of personal data.

2. Aims:

With this policy, the Edison Group of Schools aims at ensuring that we comply with the data protection principles, as listed below:

1. ensuring that data is collected and used fairly, lawfully and appropriately
2. processing personal data only in order to meet operational needs, educational requirements or fulfil legal obligations
3. taking steps to ensure that personal data is up-to-date and accurate
4. establishing appropriate retention periods for personal data and confidential records
5. ensuring that data subjects' rights can be appropriately exercised
6. providing adequate security measures to protect personal data and confidential information
7. ensuring that all staff are made aware of good practice in data protection and confidentiality
8. providing adequate training for all staff responsible for personal data
9. ensuring that everyone handling personal data knows where to find further guidance

10. ensuring that queries about data protection, confidentiality and information security, internal and external to the Edison Group of Schools, are dealt with effectively and promptly
11. regularly reviewing data protection procedures and guidelines within the Edison Group of Schools.

3. Data Protection Principles:

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss, destruction of, or damage to personal data.
7. Confidential information relating to students, staff, parents and school operations shall be protected and shared only with authorised individuals on a need-to-know basis.

4. Data Gathering:

All personal data relating to staff, students and/or other people with whom the Edison Group of Schools has contact, whether held in digital or paper files, are covered by this policy.

The Edison Group of Schools will ensure that only relevant personal data is collected and that the person from whom this data is collected is duly informed of the data's intended use and any possible disclosures that may be made of the information given.

5. Data Storage:

The Edison Group IT Officer and/or designated Information Technology personnel will ensure that:

1. Personal data is stored in a secure and safe manner.
2. Electronic data is protected by secure passwords, user access controls, firewall systems and other appropriate security measures operated by the school.

3. Computer workstations in administrative areas are positioned so that they are not visible to unauthorised persons or casual observers.
4. Manual data is stored where it is not accessible to anyone who does not have a legitimate reason to access, view or process the data.
5. Particular attention is paid to the need for security of sensitive personal data and confidential records.
6. Regular backups of electronic data are maintained and protected appropriately.

6. Data Checking:

1. The Edison Group IT Officer and/or designated administrative personnel will issue regular reminders to staff and other stakeholders to ensure that personal data held is up-to-date and accurate.
2. Any errors discovered are to be rectified immediately.
3. If any incorrect information has been disclosed to a third party, this must be rectified immediately and documented.
4. Staff are responsible for informing the school of any changes to personal details, contact information or emergency contact information.

7. Data Disclosures:

1. Personal data will only be disclosed to organisations or individuals for whom consent has been given to receive this data, or to individuals who have a legal right to receive the data without consent being given.
2. When requests to disclose personal data are received by telephone, it is the responsibility of the Administration Office to determine whether the caller is entitled to receive the requested data.
3. If a personal request is made for personal data to be disclosed, it is again the responsibility of the Administration Office to ensure the individual is entitled to receive the data. If the person is not known, proof of identity must be requested.
4. Requests from parents or students for printed lists of names, addresses, telephone numbers or personal details of other students must be refused politely, as permission from all data subjects would need to be obtained.
5. Personal data, photographs, videos or other identifying information must not be used in newsletters, publications, websites, social media platforms or other media without the consent of the data subject or the parent/guardian where applicable.

6. The Edison Group of Schools will keep a record of any personal data disclosed so that the recipient can be informed if the data is later found to be inaccurate and to maintain an accurate record of who the data has been disclosed to.
7. All staff must maintain confidentiality regarding student records, assessment information, safeguarding information, personnel records and any confidential school information obtained through the course of their employment.