Policy Title:	**Data Protection Policy; incorporating GDPR and CCTV**
Policy Reference:	**TOA060**
Description:	**This policy has been complied to take into account of the provisions of the General Data Protection Regulation (GDPR).**
Status:	**Statutory**
Category:	**Academy**
Contact:	**Name:** Ruth Bright **Title:** Finance Director **Tel No:** 01865 774311
Version:	**V1.0**
Other relevant TOA polices:	
Adopted by the Governing Board on:	**24 September 2018**
Date for Review:	**September 2020**

Change Record

Version	Date	Description

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General Data Protection Regulation (GDPR) Policy and Procedures (Incorporating CCTV)

1.0 Sharing data with The Oxford Academy (TOA)

1.1 On the 25th May 2018 the current Data Protection Act (DPA) will be replaced by the new General Data Protection Regulation (GDPR) - meaning the way information and data is managed will change. The DPA (1998) law was developed to protect <u>individuals</u> against misuse or abuse of information about them. GDPR prevents any organisation, including schools, selling or passing on information about their customers, staff or students.

1.2 The GDPR is a new data protection regulation designed to strengthen and unify the safety and security of all data held within an organisation (including schools and academies). It is focused on looking after the privacy and rights of the individual and is based on the premise that data subjects should have knowledge of what data is held about them and how it is used.

1.3   The GDPR includes the requirement for organisations to look into the technical and organisational measures in place to protect against unlawful processing, accidental loss or destruction of data.

2.0   How will GDPR affect schools?

2.1   The GDPR changes the way schools, academies and trusts handle their data and the way information is managed. A failure to comply could lead to large fines.

3.0   Data we hold

3.1   Data held by The Oxford Academy about our own "customers" (our students, our employees, suppliers and contractors) will include all or some of the following:

- Legal and known name
- Date of birth
- Address
- Telephone number
- Email address
- Bank details
- Qualifications
- Education and training data
- Health issues as declared to TOA

- Safeguarding data
- National Insurance number

3.2   The data we hold is limited to that which we need to enable us to comply with statutory Department for Education (DfE) and HMRC purposes.

3.3   We do not accept card payments for educational purchases from the school, so have no record of any card details.

3.4   All data held is stored securely on our servers which have firewalls in place to prevent intrusion. No data is held off site or online. Backups are stored securely.

3.5   We share any data with external organisations solely to execute our statutory obligations as laid down by the DfE, HMRC and any other Government department.

4.0   How we handle your data

4.1   The Oxford Academy maintains a database of personal data which is password protected. Staff are assigned a level of access to the database that ensures they are able to obtain sufficient information to enable them to do their job. Staff are not privy to personal information that they do not need to know.

4.2   Access to laptops has a user level of encryption, managed by our IT provider.

4.3   There is a system for reporting breaches of IT security.

4.4   Data is obtained, retained and disposed of as set out in the

Information Management Toolkit for Schools"

https://c.ymcdn.com/sites/irms.site-ym.com/resource/collection/8BCEF755-0353-4F66-9877-CCDA4BFEEAC4/2016_IRMS_Toolkit_for_Schools_v5_Master.pdf

This document has been adopted by the Governors in our "TOA - Data and Document Retention Policy" February 2018.

4.5   We do not copy personal data onto either CD, DVD or data stick.

4.6   Any email containing personal data is sent using a method of encryption that is password protected by the sender.

5.0   Any request for data raised under GDPR should be sent to dpo@theoxfordacademy.org.uk

5.0   Monitoring, Evaluation and Review

5.1   The Governing Board will review this policy at least every two years and assess its implementation and effectiveness.   The policy will be promoted and implemented throughout the Academy.

Appendix 1.

GDPR: Data Protection Statement – CCTV and Door Access

The Data Controller is The Oxford Academy.

Questions on this Statement should be addressed to:

Data Protection Officer
The Oxford Academy
Sandy Lane West
Oxford
OX18 4BT

Tel: 01865 774311

Email: dpo@theoxfordacademy.org.uk

1.   Introduction

The scope of this policy covers

·   Students

·   Staff

·   Visitors

2.   What data is processed, and why?

> 2.1   The Academy operates a CCTV and Access control system to record access and activity around the Academy grounds.
> 2.2   The CCTV system records images of people around the site.
> 2.3   The Access Control System records door access data including:

·   First Name

·   Last Name

·   Door Name

·   Time and Date Accessed.

3.   Where does the data come from?

3.1   Access Control Data is populated via two systems:

(1)   TDSI system installed, maintained and managed by Protec* for the internal and external doors

(2) InVentry ** system for recording who has registered as being on site within the building at any given time

3.2   Personal information is populated from the Capita SIMS Personnel system for staff and the Capita SIMS Student Records system for students.

3.3   Contractors and regular visitors have their data recorded on our Single Central Record. This information is used to populate the InVentry system

3.4   CCTV camera data is recorded from the CCTV Cameras installed on site.

4.   Sharing with Third Parties

4.1   In the case of an Academy incident being investigated, Access Control and CCTV footage may be shared with both The Police and Academy Officers.

4.2   Retention of data

(1) CCTV footage is stored for 31 days and automatically deleted on the 32nd day.

(2) Door data is retained for 12 months.

5.   Rights of the Data Subject

5.1   Those whose personal data is recorded by these means – the data subjects – have the right:

- to ask for access to, rectification or erasure of their personal information
- to restrict processing (pending correction or deletion)
- to object to communications
- to ask for the transfer of their personal information electronically to a third party (data portability).

5.2   Some of these rights are not automatic, and we reserve the right to discuss with the data subject why we might not comply with a request from them to exercise such rights.

5.3   If data subjects have questions or concerns about their personal information, or how it used, they are invited to speak to the Data Protection Officer at dpo@theoxfordacademy.org.uk.

*   https://manualzz.com/doc/11106758/access-control
** https://inventry.co.uk/