



Data Protection Policy

Updated: 01/04/2022

Gardens Montessori aims to fulfil its obligations under the General Data Protection Regulation (GDPR) 2017 to the fullest extent. This policy sets out our commitment to protecting personal data and how that commitment is implemented in respect of the collecting, processing, using, storing and sharing of personal data.

We have appointed a Data Protection Co-ordinator who is responsible for ensuring our compliance with the GDPR. Their details are available on request.

We are registered with the Information Commissioners Office (ICO).

Any persons handling data are aware of their responsibilities in collecting, using and sharing data.

We have a privacy notice that sets out the lawful bases for processing the data, the legitimate interests for the processing, individual's rights and the source of the personal data.

We have a process in place to record any data breaches and a form for reporting breaches to the ICO and any investigations.

Procedures covering the retention of documents, and the archiving of them, are contained in our Disclosure Handling policy, and our Privacy Statement.

We have an asset register in place to record the different types of information and documentation that we hold. This is updated regularly. The register resides within a Microsoft Access database and shows how information is processed, stored and shared.

Procedure

This provision is aware that data protection legislation applies equally to children and staff. Article 5 of the GDPR sets out the principles by which we abide:

- Data must be processed fairly, lawfully and in a transparent manner.
- Data must only be obtained for specified and lawful purposes.
- Data must be adequate, relevant and not excessive (limited to what is necessary).
- Data must be accurate and up to date.
- Data must not be kept for longer than necessary.
- Data must be securely kept.

We use the GDPR rights for individuals.

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.



- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision-making and profiling.

The following procedures apply to information held about children.

1. A child's educational records will be disclosed to their parent or carer in line with our policy of parents as partners.
2. That part of a child's educational records normally reserved for teachers' use can be made available without charge within 15 working days of receipt of a written request. If a copy of the information is requested, a charge may be made but it will not exceed the cost of supply.
3. Children's records will be stored securely. Paper files are locked in cabinets in the provision's office. Electronic files are stored in an encrypted Microsoft Access database, on encrypted computers or on Microsoft Office 365 cloud-based servers. Computers within the provision are kept secure with appropriate software, which is regularly updated, to ensure maximum protection against viruses, ransomware and malware. All data is securely backed up to Microsoft Azure using encryption, as well as to local hardware in the administration office, the office being protected by locks and a monitored alarm system.
4. Information that is shared is done so securely using a secure email system or password protection of the document.

The following procedures apply to information held about staff.

1. A copy of their personal data is available to each member of staff at all times. A report containing teaching staff details is printed, and stored securely at school, at the beginning of each term.
2. Members of staff are required to read this information carefully and inform the deputy head at the earliest opportunity if they believe that anything is inaccurate or untrue, or if they are dissatisfied with the information in any way.

The following procedures apply to any third parties that we are contracted with:

Where identifiable information needs to be provided to external organizations that provide us with services, we request documents that demonstrate their compliance with GDPR, as well as ensuring that confidentiality agreements are in place.