

Leyland St. James' CE (Aided) Primary School



Leyland St. James' Primary School – a Christian family where all are valued, children achieve and the future begins.

Our mission is to serve the community through serving our children.

Every child is welcomed regardless of need for 'who so ever welcomes one such child in my name welcomes me' (Matthew 18.5). Everyone is valued; everyone has worth. We ensure that every child develops within God's love.

Data Protection Officer – Roles and Responsibilities

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BACKGROUND

The Data Protection Officer (**DPO**) (the head teacher) will be involved in all issues which relate to the protection of personal data. This document sets out the Leyland St. James' Primary School would expect the DPO to have and the roles and responsibilities the DPO would assume in the role. This role will be combined with the role of Compliance and Legal Officer and Exostructure Administrator Roles].

EXPERIENCE

- 1.1 The DPO will have extensive working knowledge of the UK data protection laws including the Data Protection Act 1998 and the Freedom of Information Act 2000 for state schools.
- 1.2 The DPO will understand the data flows and specific requirements within the educational sector.
- 1.3 The DPO will have experience and an understanding of implementing:
 - 1.3.1 technical and organisational privacy measures and procedures;
 - 1.3.2 technical requirements for privacy by design, privacy by default and data security; and
 - 1.3.3 data protection training and awareness initiatives.

ROLES AND RESPONSIBILITIES

- 1.4 The roles and responsibilities of the DPO may include, but are not limited to, the following general duties:
 - 1.4.1 keeping the school management updated about data protection responsibilities, risks and issues;
 - 1.4.2 manage notifications or registrations with the UK data protection authority in respect of the data processing activities of Leyland St. James' Primary School;
 - 1.4.3 provide data protection guidelines to parents/guardians, pupils and new members of staff;
 - 1.4.4 develop and implement privacy policies and procedures for data collection, sharing, retention, disposal and other processing;

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- 1.4.5 develop and implement policies and procedures to manage the outsourcing of data processing activities including the use of third party vendors for HR, IT and marketing purposes;
 - 1.4.6 conduct due diligence exercise when engaging with contractors and third parties that are processing pupils', their parents'/guardians' and staff personal data;
 - 1.4.7 liaise with the IT department in relation to the development of policies, procedures and practices for information security, data handling, outsourcing, BYOD and monitoring in the school environment;
 - 1.4.8 monitor the application of data protection by design, data protection by default and data security prior to the design, procurement, development and setting-up of systems for the automated processing of personal data;
 - 1.4.9 report directly to the governing body of Leyland St. James' Primary School;
 - 1.4.10 raise awareness, inform and advise teachers, pupils and school contractors (staff) of their obligations pursuant to data protection law. This may involve training staff, creating internal publications and etc. The DPO will document ways in which such activities are carried out;
 - 1.4.11 implement and monitor data protection impact assessments;
 - 1.4.12 maintain documentation required to fulfil Leyland St. James' Primary School obligations under data protection law; and
 - 1.4.13 attend training sessions to maintain the specialised knowledge required to perform DPO duties.
- 1.5 The DPO will be responsible for dealing with a **personal data breach**, which may include, but is not limited to, the following: *[Note: breach notification to the Information Commissioner's Office (The ICO) is not mandatory for educational sector, this requirement will change once the EU General Data Protection Regulation will come into force in 2017]:*
- 1.5.1 assisting internal IT teams with a breach containment;
 - 1.5.2 notifying data subjects of the breach where necessary (i.e. if the breach could result in identify theft or fraud, physical harm, significant

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humiliation or damage to reputation), including providing them with the following information:

- (a) The nature of the breach
 - (b) Recommendations as to how the data subject can mitigate potential adverse effects
- 1.5.3 maintaining all documentation in relation to a data breach which should include the documentation on the following:
- (a) facts about the breach;
 - (b) its effects and the remedial action to be taken (to include information about technical and organisational measures).
- 1.6 The DPO will act as the contact point for, and be responsible for liaising with, the ICO - including, but limited to, as follows:
- 1.6.1 manage notifications or registrations with the UK data protection authority in respect of the data processing activities of the Leyland St. James' Primary School;
 - 1.6.2 responding to, and co-operating with, any requests from the relevant supervisory authority within the DPO's competence;
 - 1.6.3 monitoring the response to, and co-operation of, any requests from the relevant supervisory authority which are outside the DPO's competence; and
 - 1.6.4 taking the initiative to communicate with the relevant supervisory authority where the DPO sees fit.
- 1.7 The DPO will be responsible for dealing with any **requests from data subjects** exercising their rights under data protection law, to include, but not limited to:
- 1.7.1 dealing with Subject Access Requests; and
 - 1.7.2 implementing Subject Access Request policy and procedure as well as internal training on how such requests should be properly managed.