

Data Handling Policies and Procedure Overview

Reviewed by:	Resources Committee.
Signed (Governing Body):	
Date:	April 2025
Next Review due:	April 2026

Produced by Turton School

Turton School has a series of policies and documents which, in essence, collectively create a robust system for ensuring that Turton School is transparent, secure in its handling of data, responsive to information requests, and compliant with legal obligations.

They ensure that both the school's operations and the rights of individuals are safeguarded.

The policies and documents:

- Data protection policy
- Record management policy
- Freedom of information policy
- GDPR personal data log
- Subject access request policy
- Turton School publication scheme
- Disaster IT recovery plan
- Cyber security policy
- Privacy notices for students and their families, for school direct salaried trainees, for the school workforce and for community users.

Summary of How These Policies and Schemes Interact:

- **Transparency & Access:** The **Freedom of Information Policy** and the **Publication Scheme** ensure that the school is open and transparent, providing public access to relevant information. Together, they help build trust and accountability with the community.
- **Data Protection & Privacy:** The **Privacy Notices**, **SAR Policy**, and **Record Management Policy** work together to protect individuals' personal data. The notices inform individuals of their data rights, while the SAR policy facilitates access to that data. The record management policy ensures that records, including personal data, are kept secure and in compliance with data protection laws.
- **Compliance & Accountability:** All these policies ensure that the school is compliant with **UK laws** (e.g., **GDPR**, **Freedom of Information Act**), maintaining a system of accountability for how personal data and records are handled and how information is made accessible.

Here's how these different policies and schemes link together to create a comprehensive framework for managing information, privacy, and transparency at a school like Turton School:

1. Freedom of Information Policy and Publication Scheme:

- These two are closely related because both are about **public access to information**.
 - The **Freedom of Information Policy** sets the framework for how the school responds to requests for information under the **Freedom of Information Act 2000**. It ensures transparency by establishing procedures for handling requests from the public.

- The **Publication Scheme** proactively outlines the types of information the school will make available to the public, such as financial data, policies, and meeting minutes, reducing the need for individual requests and promoting transparency from the outset.

Together, they ensure the school is committed to openness and accountability, providing the public with easy access to relevant information and formalizing how information will be shared when requested.

2. Privacy Notices and Subject Access Request (SAR) Policy:

- These two work in tandem to safeguard **individual privacy** and ensure **compliance with data protection laws** (like **GDPR**).
 - **Privacy Notices** explain to individuals (students, parents, staff) how their personal data will be collected, processed, and protected. It also outlines their rights regarding their personal data.
 - The **Subject Access Request (SAR) Policy** allows individuals to formally request access to the personal data the school holds on them. The SAR policy is built upon the principles outlined in the privacy notice, ensuring that the school responds to requests for personal data in a timely and secure manner.

Together, they ensure that the school respects the rights of individuals regarding their personal data, informs them about how their data will be used, and facilitates easy access to that data upon request, all while maintaining legal compliance with data protection laws.

3. Record Management Policy and Freedom of Information Policy:

- These two policies support each other by ensuring that records are **kept securely and are accessible** when necessary.
 - The **Record Management Policy** governs how all school records (whether they are paper or electronic) are created, stored, maintained, and eventually disposed of, ensuring that records are organized, protected, and accessible as needed.
 - The **Freedom of Information Policy** relies on effective record management practices because it specifies the procedure for responding to requests for information. If the records are well-organized and easily retrievable, the school can quickly and efficiently fulfill these requests.

Together, they ensure that the school is ready to respond to information requests, complying with the **Freedom of Information Act**, while maintaining effective, secure record-keeping practices to support that process.

4. Record Management Policy and Privacy Notices:

- These two policies intersect in the area of **data security and retention**.
 - The **Record Management Policy** ensures that all records, including those containing personal data, are stored securely and disposed of properly when no longer needed.

- The **Privacy Notices** provide individuals with clarity on how long their personal data will be kept and under what circumstances it may be shared or disposed of.

Together, they help ensure that personal data is securely managed and that individuals are informed about how long their information will be held, aligning with data protection principles under **GDPR**.

5. Subject Access Request (SAR) Policy and Data Protection:

- The **SAR Policy** connects directly to the **Data Protection Policy** by ensuring that individuals can exercise their rights under data protection laws.
 - The **SAR Policy** provides a formal process for individuals to request access to their personal data, which is a key part of their **data protection rights** under **GDPR**.
 - The **Data Protection Policy** sets out how the school ensures that all data, including personal data requested via SARs, is securely stored and processed.

Together, they give individuals the tools to access and control their personal information while the school adheres to its responsibilities in managing personal data.