

St Thomas à Becket Church of England Federation

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ADOPTED MARCH 2025

REVIEW MARCH 2028

Special Category Data Policy

In our Church of England Federation, we take strength in collaboration, yet celebrate uniqueness. As schools, we may be small, but together we encourage children to be the best they can be so they are ready to make their mark on the world. We welcome the child yet embrace the whole family. We celebrate our rural environment yet aspire to look beyond our boundaries. We strive for knowledge and gratefully accept opportunities that come our way to enable us to live life in all its fullness. We all take a pride in our Federation as we follow in Jesus' example.

Summary

This policy outlines St Thomas à Becket Church of England Federation (Blackboys CEP School and Framfield CEP School) (which is referred to as the Federation in the rest of this document) obligations under Data Protection Legislation with regard to the processing of Special Category Personal Data and Criminal Offence Data. This should be read alongside the Federation's Data Protection and Information Security Policy, and our Privacy Notices.

Policy Statement

The Federation is committed to ensuring that all personal data it processes is managed appropriately and in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018) (collectively referred to as "DP legislation"). The Federation recognises its duties to protect all personal data but in particular Special Category Personal Data as defined under Data Protection legislation i.e. information that may identify an individual's:

- racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,
- health,
- sex life/orientation
- genetic/biometric identifier
- criminal convictions/offences

The Federation is also committed to process criminal offence data in accordance with DP legislation requirements. Criminal offence data refers to personal data that relates to criminal convictions and offences and associated security measures. This includes the alleged commission of offences or proceedings for an offence committed or alleged to have been committed, including sentencing.

The Federation will ensure that all Special Category Data is captured, held and used in compliance with this policy. Any proposed new use of Special Category Data will be subject to a Data Protection Impact Assessment.

For all uses of Special Category Data, the processing will be included in the Federation's Record of Processing Activity (ROPA). This will include a description of the lawful basis for processing and confirmation that the appropriate data retention rules are being applied.

Failure to comply with this policy may be subject to disciplinary procedures.

Responsibilities

Perseverance, Fellowship, Courage, Respect, Understanding, Thankfulness

The Federation’s Headteachers have overall responsibility for ensuring compliance with this policy and with Data Protection Legislation across their school.

The Data Protection Officer (DPO) has responsibility for advising the organisation on data protection matters, and for monitoring compliance with this policy.

All members of staff are responsible for understanding and complying with relevant policies and procedures for processing and protecting Special Category Data.

Related Documents

- Data Protection and Information Security Policy
- Record of Processing Activity (ROPA)
- Privacy Notices

Compliance with the Principles

All processing of personal data, including Special Category Data, is subject to the Federation’s Data Protection and Information Security Policy and all related procedures for data handling.

Below is a summary of our procedures for compliance with the principles under Article 5 of GDPR.

Data Protection Principle	Procedures for securing compliance	Relevant policies/ procedures
Personal data will be processed lawfully, fairly and in a transparent manner	<p>All use of Special Category Data will be:</p> <ul style="list-style-type: none"> • Assessed for lawfulness, fairness and transparency as part of Data Protection Impact Assessments (DPIA) • described clearly and precisely in Privacy Notices available to data subjects <p>The Federation will ensure that personal data is only processed where a lawful basis applies, (i.e. is subject to clear justification under Article 6 and 9 of GDPR)</p> <p>The Federation will only process personal data fairly, and will ensure that data subjects are not</p>	<ul style="list-style-type: none"> • Data Protection and Information Security Policy • Privacy Notices • ROPA • DPIA Procedure / Template • Federation Data Protection Training Log

	<p>mised about the purposes of any processing</p>	
<p>Personal data will be collected and used for specified, explicit and legitimate purposes and not further processed in an incompatible way (<i>'purpose limitation'</i>)</p>	<p>This will be checked within the DPIA process.</p> <p>Members of staff will be trained to ensure that they do not use personal data for purposes other than those authorised by the organisation.</p> <p>Members of staff will receive training and document procedures for relevant processes.</p> <p>Data subjects will be informed of the purpose for processing in a Privacy Notice</p>	<ul style="list-style-type: none"> • Data Protection and Information Security Policy • Privacy Notices • ROPA • DPIA Procedure / Template • Information governance or Data Protection training for staff members • Federation Data Protection Training Log
<p>Personal data collected and processed will be adequate, relevant and limited to what is necessary for the purpose for processing (<i>'data minimisation'</i>)</p>	<p>To adhere to the principle of privacy by design, the Federation only collects and holds data as necessary for their operational requirements or to meet statutory obligations.</p> <p>Members of staff have roles-based access and are trained to record only the minimal necessary personal data for business needs.</p> <p>This will also be checked within the Federation DPIA process.</p>	<ul style="list-style-type: none"> • Data Protection and Information Security Policy • DPIA Procedure / Template • Information governance or Data Protection training for staff members • Federation Data Protection Training Log
<p>Personal data will be accurate and where required, rectified without delay (<i>'accuracy'</i>)</p>	<p>The Federation has systems in place to verify the accuracy of the data it holds. These include: annually issued data collection sheets.</p>	<ul style="list-style-type: none"> • Data Protection and Information Security Policy • Data Protection training for staff members • Federation Data Protection Training Log
<p>Personal data will not be kept in an identifiable</p>	<p>The Headteachers of Blackboys CEP School and Framfield CEP School have responsibility for ensuring that the Retention</p>	<ul style="list-style-type: none"> • Data Protection and Information Security Policy

<p>form for longer than necessary (<i>'storage limitation'</i>) i.e. in line with the Federation Retention Schedule</p>	<p>Schedule is applied to all personal data, and in particular to Special Category Data. Where systems do not have the functionality to automate disposal, members of staff have a scheduled task to manually delete time-expired data.</p> <p>Records will be securely disposed of once they have reached the end of their retention period.</p>	<ul style="list-style-type: none"> • Federation Records Management Policy and Retention Schedule • Data Protection training for staff members • Federation Data Protection Training Log
<p>Personal data will be kept securely</p>	<p>All use of personal data is subject to our Data Protection and Information Security Policy and related security measures.</p> <p>Members of staff are trained to be particularly aware of the additional risks to Special Category Data and the relevant individuals have appropriate data-handling processes and guidance.</p> <p>Appropriate means of transmitting data are used. Data is securely stored and securely disposed of (where retention periods are reached).</p>	<ul style="list-style-type: none"> • Data Protection and Information Security Policy • Federation Records Management Policy and Retention Schedule • Data Protection training for staff members • Federation Data Protection Training Log

Contact

If you have any questions about this policy, please contact: The Headteacher at either Blackboys CEP School or Framfield CEP School.

Review

This policy will be reviewed annually. The policy review will be undertaken by the Federation's Headteachers and the Governing Body's Policies Working Party.