



Training, Research & Development Service Statement of Compliance with the General Data Protection Regulation

23 May 2018

Dear Sir/Madam

St Nicholas School Canterbury (**ICO Registration Code: Z9226279**) is a processor for the personal information and data of their own staff and students. St Nicholas School also is a supplier of Training, Development and Outreach Services and also is a provider of Specialist Teaching and Learning Services for local primary and secondary schools in the Canterbury and Coastal District and act as a data controller of personal information in order to fulfil these responsibilities. We are subject to and comply with the relevant obligations imposed on all data controllers. You have received this data sharing agreement because your school/organisation/centre has requested, or already receives support from, our Training, Outreach, Research and Development service.

What actions are we taking, or have we taken, to prepare for the GDPR?

Our STLS, Training, Research & Development and Admin Support teams have reviewed the regulation and we have taken all necessary steps to ensure that we are compliant. Our Senior Leadership Team (SLT) reviews the progress and approves all relevant actions at our weekly SLT meeting.

What technical and organisational security measures do we have in place to protect personal data? How secure are our systems?

St Nicholas School is committed to its customers'/partner organisations' security and privacy needs. Customer data is stored on our secure servers at our offices Canterbury, United Kingdom. Our building is protected by an electronic access control system. Our networks, internet and computer systems are protected by an up-to-date encryption, firewall and comprehensive anti-virus and anti-malware software. We have systems provided, maintained and supported by EIS who ensure that we remain protected against malicious attack and actively support us to detect signs of any potential malicious attack.

What policies and procedures do we have in place to protect personal data?

At St Nicholas School employees are subject to strict confidentiality agreements and a code of conduct to ensure that their responsibilities (for data security) are taken seriously. We have a strict data protection and security policy and documented processes in respect of subject access requests and notification of data breaches. We have signed up to the 'GDPR in Schools' and 'Data Protection Officer as a Service' software systems (provided by SPS and GroupCall) to help ensure our compliance with best practice in the areas of data protection and security.

We never share personal data with third parties other than government agencies e.g. Child Exploitation and Online Protection Centre (for ThinkUKnow Training) or the Home Office (for WRAP /Prevent training) or the third sector providers of our accredited training programmes e.g. the MAKATON Charity, Edge Services, MOVE/Enham Trust, PROACT-SCIPr-UK® for auditing and service delivery & record keeping purposes. NB: The providers of our accredited training may have to share your data with their accrediting body (e.g. British Institute of Learning Disabilities, Chartered



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Society of Occupational Therapists etc.) in order to comply with the regulations and Codes of Practice of their different programmes.

What data do we hold?

We hold the names, email addresses and contact details of our service delegates and their CPD leaders or admin support staff who made the booking. We also record the dates and levels of training provided and any recertification dates. We may also collect, store and use information relating to any purchases you make of our goods and services.

Signed

A handwritten signature in black ink, appearing to be 'SK', written over a horizontal line.

Stephen King

Deputy Headteacher, St Nicholas School Canterbury.

(Data Protection Lead and Research & Development Operational Lead)

ANNEXE - ST NICHOLAS SCHOOL'S COMMITMENT TO SCHOOLS OUR TRAINING, RESEARCH AND DEVELOPMENT SERVICES:

1. We shall comply with any written instructions with respect to processing by your school/centre/organisation
2. The people who process the data (St. Nicholas School staff) are committed to confidentiality
3. We will not engage another processor without prior written authorisation from you (named school/centre/organisation), and if we do so, the processor will also be bound by the same data protection conditions as described in this data sharing agreement (Covering letter, Annexe and Schedule of processing data).
4. St Nicholas School will help you comply with requirements regarding the data rights of individuals (e.g. to access, delete or rectify data), secure processing, the reporting and communication of data breaches, and the conducting of Data Protection Impact Assessments where relevant.
5. St Nicholas School will only retain personal data until the end of the provision of services, subject to the conditions laid out in the table below. At the end of our service relationship your information will inform our accrediting body (where appropriate) and delete your information from all our systems.
6. St Nicholas School will make information available to you (on request) to demonstrate compliance with our obligations

SCHEDULE OF PROCESSING, PERSONAL DATA AND DATA SUBJECTS

Description	Details
Subject matter of the processing	St Nicholas School is a maintained special school but has an outreach and support role. As part of this responsibility we are a centre of training, research and development for the various SEND programmes which are core to our provision for our pupils - this offer is open to our district, local community and KSENT partner organisations. We process data relating to schools and children in order to organise and quality assure the training and support for staff and pupils at the correct locations and times. We do not use the data for any other purpose.
Duration of the processing	We process data from the date on which the school, staff or pupils' details are registered in respect of our training and support programmes. We retain data for audit purposes two years after the end of the academic year where our support services cease. Staff data will be deleted. Generic school contact details are retained indefinitely to record an engagement with staff or students has taken place but the details are removed or anonymised; the organisations are entered onto a list of historic centres; no personal information is recorded. <i>We will inform our providers of accredited training that their records of personal information on staff that they hold has expired and should be destroyed also and that their centre contact details are historic and should be maintained as such, as per their data retention policies.</i>
Nature and purposes of the processing	We collect the names and contact details of schools, staff and (on occasions, if required) pupils. The data will take the form of full names, email & telephone contacts and training, support & any recertification dates. Occasionally the names, age, SEND information and records of our advice/guidance/support for pupils will be collected. The data is stored in



	our structured databases and used to calculate and generate invoices, payments and the certification of accredited training or support.
Types of Personal Data	<p>We hold contact details for schools/staff (name, address, telephone number, email address) and children (name, school address, age, SEN description) for whom our support has been engaged. We do not hold Sensitive Personal Data for staff and only for pupils (SEND information) in exceptional circumstances.</p> <p>The Entry Sign system holds an image of visitors (for 7 days) and the name is taken for identification purposes. The reason for the visit is recorded to list the purposes of visits to our building.</p>
Categories of Data Subject	We hold personal data for schools, staff and pupils that are registered with us to receive training, research and development support services.
Plan for the destruction of the data once the processing is complete	<p>We retain data for audit purposes two years after the end of the academic year where our support services cease. Staff data will be deleted. Generic school contact details are retained indefinitely to record an engagement with staff or students has taken place but the details are removed or anonymised; the organisations are entered onto a list of historic centres; no personal information is recorded.</p> <p>The Entry Sign system will hold the image (for identification purposes) for 1 week before it is automatically deleted. The name of our visitors and the details (inc. purpose) of their visit are retained in our database for 365 days, before they are automatically deleted - this allows us to be able to monitor who has entered our (public) building and / or used its facilities.</p> <p><i>We will inform our providers of accredited training that their records of personal information on staff that they hold has expired and should be destroyed also and that their centre contact details are historic and should be maintained as such, as per their data retention policies.</i></p>

As part of making a booking with, or engaging the support of, St Nicholas School's Training, Research and Development Service, I/We accept the terms and conditions of this data sharing agreement between St Nicholas School and our School/Organisation/Centre -

School/Organisation/Centre Name:

Authorised Signatory:

Name:

Role: Date: