



Camphill School Aberdeen

## Data Protection Policy

This Policy Statement sets out the principles which Camphill School Aberdeen (CSA) applies to comply with the “General Data Protection Regulation” (UKGDPR) enforced in the UK from 25th May 2018.

In order to operate effectively CSA has to process personal information about people with whom it works. These may include current, past and perspective employees, volunteers, co-workers, trustees, clients, pupils, young adults and suppliers. In addition, it is required by law to process information to comply with government legislation.

CSA is committed to ensuring compliance with data protection legislation. CSA regards the lawful and correct treatment of personal information as essential to its successful operation and to maintaining confidence between CSA and all employees, volunteers, co-workers, trustees, clients, pupils, young adults, and suppliers CSA will make every effort to ensure that data subjects can exercise their rights. Any breach of data protection legislation will be dealt with as a matter of urgency. If required breaches will be reported to the relevant authorities.

All processing of personal data must be conducted in accordance with the following data protection principles.

Processing must be lawful and fair: processed lawfully, fairly and in a transparent manner in relation to the data subject.

Processing must be specified, explicit and legitimate: collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (‘purpose limitation’).

Personal data must be adequate, relevant and not excessive: adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’).

Personal data must be accurate and kept up to date: accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’).

Personal data must be kept for no longer than is necessary: kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (‘storage limitation’).

Personal data must be processed in a secure manner: processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

CSA will ensure that all personnel who have access to CSA personal data receive the appropriate training, in order to comply with data protection legislation. CSA Managers are responsible for assuring appropriate training has been undertaken, including for temporary or contracted staff.

The Executive Director, supported by the Management Team, will ensure that Procedures and Guidance are in place to give full effect to this policy.

This Policy Statement is proposed by Martin Alfred, Safety, Community and Management Support Officer, endorsed by the CSA Management Team and approved by the Board of Trustees on 02/12/2021.

Signed:

A handwritten signature in black ink, appearing to read 'S Johnston', with a long horizontal flourish extending to the right.

*Stephen Johnston, Chairperson*

Review Date: December 2022