Data Protection Policy

1. Aims

Isha Academy aims to ensure that all personal data collected about staff, pupils, parents, tutors, visitors, and other individuals is collected, stored, and processed in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018 (DPA 2018).

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. Legislation and Guidance

This policy meets the requirements of the GDPR and the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR. It meets the requirements of the Protection of Freedoms Act 2012 when referring to the use of biometric data. It also reflects the ICO's code of practice for the use of surveillance cameras and personal information.

3. Definitions

TERM	DEFINITION
Personal data	Any information relating to an identified, or identifiable, living individual. This may include: • Name (including initials) • Identification number • Location data • Online identifier (e.g., username)
Special categories of personal data	Personal data, which is more sensitive and so needs more protection, including: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Genetics • Biometrics (e.g., fingerprints) for identification • Health – physical or mental • Sex life or sexual orientation
Processing	Any activity done to personal data, such as collecting, recording, storing, using, or destroying it.
Data subject	The individual whose personal data is held or processed.
Data controller	An organisation that determines the purposes and means of processing personal data.
Data processor	A person or entity that processes personal data on behalf of the data controller.

Personal data breach	A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

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4. The Data Controller

Isha Academy processes personal data relating to parents, pupils, staff, tutors, and visitors, and therefore acts as a data controller.

5. Roles and Responsibilities

This policy applies to all staff employed by Isha Academy and to external organisations or individuals working on its behalf. Staff who do not comply with this policy may face disciplinary action.

5.1 Leadership Team The leadership team has overall responsibility for ensuring that Isha Academy complies with all relevant data protection obligations.

5.2 Academy Manager The manager acts as the representative of the data controller on a day-to-day basis.

5.3 All Staff and Tutors All staff and tutors are responsible for:

- Collecting, storing, and processing personal data in line with this policy.
- Informing the academy of any changes to their personal data.

6. Data Protection Principles

The GDPR is based on data protection principles that Isha Academy must comply with. Personal data must be:

- Processed lawfully, fairly, and transparently.
- Collected for specific, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Retained only as long as necessary.
- Processed securely.

This policy outlines how Isha Academy complies with these principles.

7. Collecting Personal Data

7.1 Lawfulness, Fairness, and Transparency Isha Academy will only process personal data where there is a lawful basis under data protection law, such as fulfilling a contract, complying with a legal obligation, protecting vital interests, performing a task in the public interest, or where explicit consent has been given.

7.2 Limitation, Minimisation, and Accuracy We will:

- Collect only the necessary data.
- Keep data accurate and up to date.
- Delete or anonymise data when no longer needed.

8. Sharing Personal Data

Isha Academy will only share personal data where legally required or with explicit consent. For example:

- With service providers such as IT companies.
- With emergency services in critical situations.
- With law enforcement when required by law.

9. Subject Access Requests and Rights of Individuals

Individuals have the right to:

- Access their personal data.
- Request rectification, erasure, or restriction of their data.
- Object to data processing.
- Withdraw consent.

10. Photographs and Videos

Isha Academy may take photographs and videos for promotional or educational purposes. Consent will be obtained, and individuals may withdraw consent at any time. Photos and videos will not include identifiable personal information unless explicitly agreed.

11. Data Protection by Design and Default

Isha Academy will integrate data protection into all processing activities by:

- Conducting data protection impact assessments when necessary.
- Regularly training staff on data protection.

12. Data Security

Isha Academy will ensure personal data is stored securely and protected against unauthorised access. Measures include:

- Locking paper records when not in use.
- Using strong, unique passwords for electronic devices.
- Encrypting portable devices.

13. Disposal of Records

Personal data will be disposed of securely when no longer needed, e.g., shredding paper records or securely deleting electronic files.

14. Personal Data Breaches

In the event of a data breach, Isha Academy will follow the procedure outlined in the Data Breach Management Plan.

15. Monitoring and Review

Isha Academy will monitor and review this policy annually. Any changes will be shared with all staff and relevant stakeholders.

16. Links with Other Policies

This policy is linked to the:

- Freedom of Information Publication Scheme.
- Internet and IT Usage Policy.
- Data Breach Management Plan.

Review date: Autumn 2027