



General Data Protection Regulation (GDPR) Governor Statement of Intent

March 2019

GDPR – Statement of Intent in respect of GDPR and the Data Protection Officer (DPO) role

1. The Governing Body of Bedenham & Holbrook Federation of Primary Schools understands that it is a Data Controller for the purposes of GDPR. It is also a Public Authority for GDPR purposes.
2. As the Governing Body of Bedenham & Holbrook Federation of Primary Schools is a public authority it has appointed Mrs D Bissaker (Holbrook) and Mrs S Davies (Bedenham) as Data Protection Officers (DPO), in order to comply with the requirements of the GDPR.
3. The high levels roles and responsibilities within Bedenham & Holbrook Federation of Primary Schools in respect of GDPR compliance are as follows:
 - a. The Governing Body – is the Data Controller and has overall responsibility for the Federation’s data ecosystem, policies and compliance with GDPR;
 - b. The Executive Headteacher and Heads of School are the Federation’s senior leaders and are responsible on a day to day basis with other senior leaders for overall GDPR compliance on behalf of the Governing Body;
 - c. The DPO is responsible for supporting the Executive Headteacher, Head of School and Governing Body to ensure compliance by undertaking the tasks set out in this document.
4. Our DPOs are tasked with:
 - monitoring the Federation’s compliance with the GDPR, other data protection laws, and the Federation’s data protection policies;
 - awareness-raising amongst staff and Governors within the School about data protection obligations;
 - training of staff and Governors on data protection;
 - audits in the Federation in respect of compliance with data protection obligations.
5. Our DPOs shall report to the Executive Headteacher and Heads of School, and will also have direct access to report to the Governing Body for the purposes of their DPO role.

6. The Governing Body and Executive Headteacher recognise, agree and will seek to ensure that our DPO is given the required independence to perform their tasks. The Governing Body and Executive Headteacher shall ensure that staff and Governors involve our DPOs, in a timely manner, in all issues relating to the protection of personal data.

7. In particular, the Governing Body and Executive Headteacher shall ensure that:
 - the Federation's DPOs are sufficiently well resourced and supported to be able to perform their tasks; including the time and resource required to acquire expertise and experience in the field of data protection as necessary
 - the Federation does not penalise the DPOs for performing their duties;
 - any other tasks or duties assigned to our DPOs do not result in a conflict of interests with their role as a DPO;
 - staff and Governors take account of our DPOs' advice and the information they provide on data protection obligations;
 - when carrying out a Data Privacy Impact Assessment (DPIA), staff seek the advice of the DPOs, who also monitors the process;
 - the Federation's DPOs act as a contact point for the Information Commissioner's Office (ICO) and will co-operate with the ICO;
 - when performing their tasks, the Federation's DPOs shall have due regard to the risk associated with processing operations, and takes into account the nature, scope, context and purposes of processing data within the Federation.

This statement was agreed and adopted by the Governing Body and Executive Headteacher on