DATA PROTECTION POLICY

May 2018

(Version 1)

Date approved by SNOMAC Directors	**24th May 2018**
Next review date	**May 2019**
Body responsible for review	**Board of Directors**
Signed: Director	**J Griffin**
Date Signed	**11th June 2018**

Constituent academies to which this policy applies:

	Principal's Signature/Date acknowledged by Academy Committee	
Hagley Catholic High School		
Our Lady of Fatima Primary		
St Ambrose Catholic Primary		
St Joseph's Catholic Primary		
St Mary's Catholic Primary		
St Wulstan's Catholic Primary		

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1 Policy statement

1.1 St Nicholas Owen Catholic Multi Academy Company (SNOMAC or Company) is committed to the protection of personal data for which we are the data controller.

1.2 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities as a Company we will collect, store and process personal data about our pupils, workforce, parents and others. This makes us a data controller in relation to that personal data.

1.3 The law imposes significant fines for failing to lawfully process and safeguard personal data and failure to comply with this policy may result in those fines being applied.

1.4 All members of our workforce must comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary or other action.

2 About this policy

2.1 The types of personal data that we may be required to handle include information about pupils, parents, our workforce, and others that we deal with. The personal data which we hold is subject to certain legal safeguards specified in the General Data Protection Regulation ('GDPR'), and other related Data Protection Legislation (such as the proposed Data Protection Act 2017-2019).

2.2 This policy and any other documents referred to in it set out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.

2.3 This policy does not form part of any employee's contract of employment and may be amended at any time.

2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we process personal data.

3 Definition of data protection terms

3.1 All defined terms in this policy are indicated in bold text, and a list of definitions is included in the Annex to this policy.

4 Data Protection Officer

As a Company we are required to appoint a Data Protection Officer ("DPO"). Our DPO is:

YourIG Data Protection Officer Service
Dudley MBC
The Council House
Dudley
West Midlands
DY1 1HF Email: YourIGDPOService@dudley.gov.uk

4.1 The DPO is responsible for ensuring compliance with the Data Protection Legislation and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the DPO.

4.2 The DPO is also the central point of contact for all data subjects and others in relation to matters of data protection.

5 Data protection principles

5.1 Anyone processing personal data must comply with the data protection principles. These provide that personal data must be:

5.1.1 Processed fairly and lawfully and transparently in relation to the data subject;

5.1.2 Processed for specified, lawful purposes and in a way which is not incompatible with those purposes;

5.1.3 Adequate, relevant and not excessive for the purpose;

5.1.4 Accurate and up to date;

5.1.5 Not kept for any longer than is necessary for the purpose; and

5.1.6 Processed securely using appropriate technical and organisational measures.

5.2 **Personal Data** must also:

5.2.1 be processed in line with data subjects' rights;

5.2.2 not be transferred to people or organisations situated in other countries without adequate protection.

5.3 We will comply with these principles in relation to any processing of personal data by St Nicholas Owen Catholic Multi Academy Company and its constituent academies.

6 Fair and lawful processing

6.1 Data Protection Legislation is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

6.2 For personal data to be processed fairly, data subjects must be made aware:

6.2.1 that the personal data is being processed;

6.2.2 why the personal data is being processed;

6.2.3 what the lawful basis is for that processing (see below);

6.2.4 whether the personal data will be shared, and if so with whom;

6.2.5 the period for which the personal data will be held;

6.2.6 the existence of the data subject's rights in relation to the processing of that personal data; and

6.2.7 the right of the data subject to raise a complaint with the Information Commissioner's Office in relation to any processing.

6.3 We will only obtain such personal data as is necessary and relevant to the purpose for which it was gathered, and will ensure that we have a lawful basis for any processing.

6.4 For personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the Data Protection Legislation. We will normally process personal data under the following legal grounds:

6.4.1 where the processing is necessary for the performance of a contract between us and the data subject, such as an employment contract;

6.4.2 where the processing is necessary to comply with a legal obligation that we are subject to, (e.g the Education Act 2011);

6.4.3 where the law otherwise allows us to process the personal data or we are carrying out a task in the public interest; and

6.4.4 where none of the above apply then we will seek the consent of the data subject to the processing of their personal data.

6.5 When special category personal data is being processed then an additional legal ground must apply to that processing. We will normally only process special category personal data under following legal grounds:

6.5.1 where the processing is necessary for employment law purposes, for example in relation to sickness absence;

6.5.2 where the processing is necessary for reasons of substantial public interest, for example for the purposes of equality of opportunity and treatment;

6.5.3 where the processing is necessary for health or social care purposes, for example in relation to pupils with medical conditions or disabilities; and

6.5.4 where none of the above apply then we will seek the consent of the data subject to the processing of their special category personal data.

6.6 We will inform data subjects of the above matters by way of appropriate privacy notices which shall be provided to them when we collect the data or as soon as possible thereafter, unless we have already provided this information such as at the time when a pupil joins us.

6.7 If any data user is in doubt as to whether they can use any personal data for any purpose then they must contact the School Designated Data Champion, in the event of his/her absence contact the School Principal.

Vital Interests

6.8 There may be circumstances where it is considered necessary to process personal data or special category personal data in order to protect the vital interests of a data subject. This might include medical emergencies where the data subject is not in a position to give consent to the processing. We believe that this will only occur in very specific and limited circumstances. In such circumstances we would usually seek to consult with the DPO in advance, although there may be emergency situations where this does not occur.

Consent

6.9 Where none of the other bases for processing set out above apply then the Company must seek the consent of the data subject before processing any personal data for any purpose.

6.10 There are strict legal requirements in relation to the form of consent that must be obtained from data subjects.

6.11 When pupils and or our Workforce join the Company/a constituent academy, a consent form will be required to be completed in relation to them. This consent form deals with the taking and use of photographs and videos of them, amongst other things. Where appropriate third parties may also be required to complete a consent form.

6.12 In relation to all pupils under the age of 16 years old we will seek consent from an individual with parental responsibility for that pupil.

6.13 We will generally seek consent directly from a pupil who has reached the age of 16, however we recognise that this may not be appropriate in certain circumstances and therefore may be required to seek consent from an individual with parental responsibility.

6.14 In relation to all pupils aged 13 and above we will seek their consent to set up an account in their name with any external provider of educational services. This is only applicable for services incurring a cost to the school in accordance with current legislation.

6.15 If consent is required for any other processing of personal data of any data subject, then the form of this consent must:

6.15.1 Inform the data subject of exactly what we intend to do with their personal data;

6.15.2 Require them to positively confirm that they consent – we cannot ask them to opt-out rather than opt-in; and

6.15.3 Inform the data subject of how they can withdraw their consent.

6.16 Any consent must be freely given, which means that we cannot make the provision of any goods or services or other matter conditional on a data subject giving their consent.

6.17 The DPO must always be consulted via the designated school Data Champion in relation to any consent form before consent is obtained.

6.18 A record must always be kept of any consent, including how it was obtained and when.

7 Processing for limited purposes

7.1 In the course of our activities as a constituent academy, we may collect and process the personal data set out in our Schedule of Processing Activities. This may include personal data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and personal data we receive from other sources (including, for example, local authorities, other schools, parents, other pupils or members of our workforce).

7.2 We will only process personal data for the specific purposes set out in our Schedule of Processing Activities or for any other purposes specifically permitted by Data Protection Legislation or for which specific consent has been provided by the data subject.

8 Notifying data subjects

8.1 If we collect personal data directly from data subjects, we will inform them about:

8.1.1 our identity and contact details as Data Controller and those of the DPO;

8.1.2 the purpose or purposes and legal basis for which we intend to process that personal data;

8.1.3 the types of third parties, if any, with which we will share or to which we will disclose that personal data;

8.1.4 whether the personal data will be transferred outside the European Economic Area ('EEA') and if so the safeguards in place;

8.1.5 the period for which their personal data will be stored, by reference to our Retention and Destruction Policy;

8.1.6 the existence of any automated decision making in the processing of the personal data along with the significance and envisaged consequences of the processing and the right to object to such decision making; and

8.1.7 the rights of the data subject to object to or limit processing, request information, request deletion of information or lodge a complaint with the ICO.

8.2 Unless we have already informed data subjects that we will be obtaining information about them from third parties (for example in our privacy notices), then if we receive personal data about a data subject from other sources, we will provide the data subject with the above information as soon as possible thereafter, informing them of where the personal data was obtained from.

8.3 Where the Company/ constituent academy is provided with information relating to third parties e.g. in the form of emergency contact details. These individuals must be given the above information. The providing parent/guardian is required to obtain the consent of any third party whose details they provide. To assist the Company will provide an information sheet for the parent/guardian to use.

9 **Adequate, relevant and non-excessive processing**

9.1 We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject, unless otherwise permitted by Data Protection Legislation.

10 **Accurate data**

10.1 We will ensure that personal data we hold is accurate and kept up to date.

10.2 We will take reasonable steps to destroy or amend inaccurate or out-of-date data.

10.3 Data subjects have a right to have any inaccurate personal data rectified. See further below in relation to the exercise of this right.

11 **Timely processing**

11.1 We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all personal data which is no longer required.

12 **Processing in line with data subject's rights**

12.1 We will process all personal data in line with data subjects' rights, in particular their right to:

12.1.1 request access to any personal data we hold about them;

12.1.2 object to the processing of their personal data, including the right to object to direct marketing;

12.1.3 have inaccurate or incomplete personal data about them rectified;

12.1.4 restrict processing of their personal data;

12.1.5 have personal data we hold about them erased

12.1.6 have their personal data transferred; and

12.1.7 object to the making of decisions about them by automated means.

The Right of Access to Personal Data

12.2 Data subjects may request access to all personal data we hold about them. Such requests will be considered in line with the schools Subject Access Request Procedure.

The Right to Object

12.3 In certain circumstances data subjects may object to us processing their personal data. This right may be exercised in relation to processing that we are undertaking on the basis of a legitimate interest or in pursuit of a statutory function or task carried out in the public interest.

12.4 An objection to processing does not have to be complied with where the school can demonstrate compelling legitimate grounds which override the rights of the data subject.

12.5 **Such considerations are complex and must always be referred to the DPO upon receipt of the request to exercise this right**.

12.6 In respect of direct marketing any objection to processing must be complied with.

12.7 The Company is not however obliged to comply with a request where the personal data is required in relation to any claim or legal proceedings.

The Right to Rectification

12.8 If a data subject informs the constituent academy that personal data held about them by the constituent academy is inaccurate or incomplete, then we will consider that request and provide a response within one month.

12.9 If we consider the issue to be too complex to resolve within that period, then we may extend the response period by a further two months. If this is necessary, then we will inform the data subject within one month of their request that this is the case.

12.10 We may determine that any changes proposed by the data subject should not be made. If this is the case, then we will explain to the data subject why this is the case. In those circumstances we will inform the data subject of their right to complain to the Information Commissioner's Office at the time that we inform them of our decision in relation to their request.

The Right to Restrict Processing

12.11 Data subjects have a right to "block" or suppress the processing of personal data. This means that the constituent academy can continue to hold the personal data but not do anything else with it.

12.12 The constituent academy must restrict the processing of personal data:

12.12.1 Where it is in the process of considering a request for personal data to be rectified (see above);

12.12.2 Where the constituent academy is in the process of considering an objection to processing by a data subject;

12.12.3 Where the processing is unlawful but the data subject has asked the constituent academy not to delete the personal data; and

12.12.4 Where the constituent academy no longer needs the personal data but the data subject has asked the constituent academy not to delete the personal data because they need it in relation to a legal claim, including any potential claim against the constituent academy.

12.13 If the constituent academy has shared the relevant personal data with any other organisation then we will contact those organisations to inform them of any restriction, unless this proves impossible or involves a disproportionate effort.

12.14 The DPO must be consulted in relation to requests under this right.

The Right to Be Forgotten

12.15 Data subjects have a right to have personal data about them held by the constituent academy erased only in the following circumstances:

12.15.1 Where the personal data is no longer necessary for the purpose for which it was originally collected;

12.15.2 When a data subject withdraws consent – which will apply only where the constituent academy is relying on the individuals consent to the processing in the first place;

12.15.3 When a data subject objects to the processing and there is no overriding legitimate interest to continue that processing – see above in relation to the right to object;

12.15.4 Where the processing of the personal data is otherwise unlawful;

12.15.5 When it is necessary to erase the personal data to comply with a legal obligation.

12.16 The constituent academy is not required to comply with a request by a data subject to erase their personal data if the processing is taking place:

12.16.1 To exercise the right of freedom of expression or information;

12.16.2 To comply with a legal obligation for the performance of a task in the public interest or in accordance with the law;

12.16.3 For public health purposes in the public interest;

12.16.4 For archiving purposes in the public interest, research or statistical purposes; or

12.16.5 In relation to a legal claim.

12.17 If the constituent academy has shared the relevant personal data with any other organisation then we will contact those organisations to inform them of any erasure, unless this proves impossible or involves a disproportionate effort.

12.18 The DPO must be consulted in relation to requests under this right.

Right to Data Portability

12.19 In limited circumstances a data subject has a right to receive their personal data in a machine readable format, and to have this transferred to other organisation.

12.20 If such a request is made then the DPO must be consulted.

13 **Data security**

13.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

13.2 We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

13.3 Security procedures include:

13.3.1 **Entry controls.** Entry to all constituent academies within the company is strictly controlled via physical barrier security and all visitors are required to sign in and obtain a visitor pass/lanyard.

13.3.2 **Secure lockable desks and cupboards.** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)

13.3.3 **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required. IT assets must be disposed of in accordance with the Information Commissioner's Office guidance on the disposal of IT assets.

13.3.4 **Equipment.** Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off

or lock their PC when it is left unattended. Responsibility of a school provided laptop rests with the designated member of staff. Staff should ensure they have exclusive control of a laptop allocated to their use.

13.3.5 **Working away from the school premises – paper documents.** High Level: e.g. Records that contain sensitive information such as staff personnel files and student file, medical and SEN records can only be taken offsite in exceptional circumstances and must be approved by the Principal of the relevant constituent academy. All such incidences will be recorded in a central record held by the Principal. For the central SNOMAC office the same procedure should be followed with the MAC Business Director authorising and recording such activity.

Low Level: e.g. Pupil name or progress marks/marksheet data/homework. Staff must minimise the frequency of taking such documents offsite unless absolutely necessary for any work being undertaken within a very limited timespan. Such records should not be stored offsite.

In all circumstances where staff take such documents offsite they must take all reasonable steps for the safe keeping of such records and access to them.

13.3.6 **Working away from the school premises – electronic working.** Wherever possible staff must store files on the school server/network and access these through secure remote solutions provided.

In circumstances where it is critical that a file containing personal data is stored on a portable device (e.g. tablet/laptop/USB/portable hard drive) this must be owned by the Company and must be fully encrypted. Staff will be responsible for taking all reasonable steps to protect against the loss of that device whilst offsite and for the prevention of unauthorised or unlawful access to any stored data.

Staff are required to adhere to other related policies and procedures, such as those set out in the Laptop Agreement and Staff Acceptable Use Policy.

It is unacceptable for staff to under any circumstances facilitate or action the transfer of files containing personal data to a device/storage or cloud based solution other than those set out in 13.3.6 or expressly authorised by the Company.

13.3.7 **Document printing.** Documents containing personal data must be collected immediately from printers and not left on photocopiers.

13.3.8 **Password Protection.** All individually allocated usernames, passwords and e-mail addresses are for the exclusive use of the individual to whom they are allocated.

Passwords used must adhere to current password policy and practice and should be changed immediately from any default password supplied. Passwords for any computer system/application should not be easy to guess and should not be kept on post it notes stuck to PC equipment.

Staff should seek further password guidance from the Staff Acceptable Use Policy.

13.3.9 **Cloud.** Any staff member wishing to store work related data must ensure that this does not contain staff or pupil personal data without the express permission of the DPO. In the event that approval is granted files must be fully password protected and encrypted.

13.3.10 **Shadow IT.** Files and records not stored on school servers e.g. smartphone apps, website portals, educational resource providers, etc. must not contain staff or student personal data unless authorised by the DPO via the school designated Data Champion.

13.4 Any member of staff found to be in breach of the above security measures may be subject to disciplinary action.

14 Data Protection Impact Assessments

14.1 The constituent academy takes data protection very seriously, and will consider and comply with the requirements of Data Protection Legislation in relation to all of its activities whenever these involve the use of personal data, in accordance with the principles of data protection by design and default.

14.2 In certain circumstances the law requires us to carry out detailed assessments of proposed processing. This includes where we intend to use new technologies which might pose a high risk to the rights of data subjects because of the types of data we will be processing or the way that we intend to do so.

14.3 The constituent academy will complete an assessment of any such proposed processing and has a template document which ensures that all relevant matters are considered.

14.4 The DPO should always be consulted as to whether a data protection impact assessment is required, and if so how to undertake that assessment.

15 Disclosure and sharing of personal information

15.1 We may share personal data that we hold about data subjects, and without their consent, with other organisations. Such organisations include the Department for Education, [and / or Education and Skills Funding Agency "ESFA"], Ofsted, health authorities and professionals, the Local Authority, examination bodies, other schools, and other organisations where we have a lawful basis for doing so.

15.2 The constituent academy will inform data subjects of any sharing of their personal data unless we are not legally required to do so, for example where personal data is shared with the police in the investigation of a criminal offence.

15.3 In some circumstances we will not share safeguarding information. Please refer to our Child Protection Policy.

15.4 Further detail is provided in our Schedule of Processing Activities.

16 Data Processors

16.1 We contract with various organisations who provide services to the constituent academy, including:

16.1.1 Annex provided on list of data processors appended to this policy. This list is not exhaustive but summarises the main categories.

16.2 In order that these services can be provided effectively we are required to transfer personal data of data subjects to these data processors.

16.3 Personal data will only be transferred to a data processor if they agree to comply with our procedures and policies in relation to data security, or if they put in place adequate measures themselves to the satisfaction of the constituent academy. The constituent academy will always undertake due diligence of any data processor before transferring the personal data of data subjects to them.

16.4 Contracts with data processors will comply with Data Protection Legislation and contain explicit obligations on the data processor to ensure compliance with the Data Protection Legislation, and compliance with the rights of Data Subjects.

17 Images and Videos

17.1 Parents and others (e.g. grandparents) attending constituent academy events are allowed to take photographs and videos of those events for domestic purposes. For example, parents can take video recordings of a school performance involving their child. The constituent academy does not prohibit this as a matter of policy.

17.2 The Company/ constituent academy does not however agree to any such photographs or videos being used for any other purpose, but acknowledges that such matters are, for the most part, outside of the ability of the Company/ constituent academy to prevent.

17.3 The constituent academy asks that parents and others do not post any images or videos which include any child other than their own child on any social media or otherwise publish those images or videos.

17.4 As a Company/constituent academy we want to celebrate the achievements of our pupils and therefore may want to use images and videos of our pupils within promotional materials, or for publication in the media such as local, or even national, newspapers covering school events or achievements. We

will seek the consent of pupils, and their parents where appropriate, before allowing the use of images or videos of pupils for such purposes.

17.5 Whenever a pupil begins their attendance at the constituent academy they, or their parent where appropriate, will be asked to complete a consent form in relation to the use of images and videos of that pupil. We will not use images or videos of pupils for any purpose where we do not have consent.

18 CCTV

18.1 Where a constituent academy operates a CCTV system, there will be a specific CCTV Policy supported by a Privacy Impact Assessment. Please refer to this policy.

19 Changes to this policy

We may change this policy at any time. Where appropriate, we will notify data subjects of those changes.

ANNEX A

DEFINITIONS

Term	Definition
Company/SNOMAC	St Nicholas Owen Catholic Multi Academy Company
Constituent Academy	Relevant specific academy: St Ambrose Catholic Primary School, St Joseph's Catholic Primary School, St Mary's Catholic Primary School, St Wulstan's Catholic Primary School, Our Lady of Fatima Catholic Primary School, Hagley Catholic High School
Data	is information which is stored electronically, on a computer, or in certain paper-based filing systems
Data Subjects	for the purpose of this policy include all living individuals about whom we hold personal data. This includes pupils, our workforce, staff, and other individuals. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information
Personal Data	means any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
Data Controllers	are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with Data Protection Legislation. We are the data controller of all personal data used in our business for our own commercial purposes
Data Users	are those of our workforce (including Governors and volunteers) whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times
Data Processors	include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions
Designated Data Champion	The member of staff identified at each individual school as the school lead on Data Protection.
Processing	is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing also includes transferring personal data to third parties
Special Category Personal Data	includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or biometric data
Workforce	Includes, any individual employed by the constituent academy such as staff and those who volunteer in any capacity including Governors [and/or Trustees / Members/ parent helpers]

ANNEX B

DATA PROCESSORS

Company Type	Data Processed and Why
Email Provider	Staff/Student details so that email accounts can be created and administered. For effective communication
Cloud Hosted Solutions (G Suite/Office 365 etc)	Staff/Student details so that email accounts can be created and administered. For effective communication and for business operational efficiency.
MIS Provider	All pupil/staff/contact data as part of support & maintenance contract (including offsite backups). For effective and efficient management of employee, parental and pupil data and to discharge legal responsibilities.
Payroll/Pensions	All staff personal details, contact details, bank account details for processing of payroll information. For payments of salary to staff, pensions administration and complying with HMRC returns.
School Meals	Staff and pupil personal data, including contact details so that cashless catering solution can be used. Biometric data also held so payment for meals can be processed accordingly. To run efficient catering for over 1000 people within a 1 hour lunch break.
Financial System	Contact details of staff which may include bank details for those claiming expenses. To pay staff expenses in a timely and efficient way.
Library Management System	Staff and student details, including first name, surname, form and photos to ensure library loans can be issued appropriately. For the efficient running of Library services including the issue and return of valuable book and other resources.
Staff/Student/Parental Contact Systems (such as text messaging)	Contact details including telephone numbers and email addresses. To maintain real time effective communication with staff, parents and pupils.
Online Curriculum Software	Student details for relevant subject/year access to software portal. To facilitate teaching and learning.
Exam Boards	Legal statutory information as required. To facilitate external examination.
Teaching and Learning Portals	Staff/Student details for relevant subject/year access to online software portal. To facilitate teaching and learning.
DfE	Legal statutory information as required (e.g. School census, workforce census, etc.) To generate funding, assess and cater for pupil needs, give assurance of efficient use of public money.
Ofsted	Legal statutory information as required. To fulfil the requirements of effective quality assurance audit of provision.
Local Authorities	Legal statutory information as required. For safeguarding and the provision of support services e.g. SEN funding/provision
Police Authority	DBS checks for workforce. Prevention and detection of crime Safeguarding of pupils, protection of school assets and the public good for the wider community