

Data Protection

General Statement

The Headteacher and Directors of the school intend to comply fully with the requirements and principles of the Data Protection Act 1998. All staff involved with the collection, processing and disclosure of personal data will be aware of the school's duties and responsibilities under the Data Protection Act 1998.

Staff will be given training on the requirements of the Act as and when it is considered appropriate. Enquiries about the policy, the Notification and the data held on the computer(s) Information about the Data Protection policy is available from the Headteacher and general information about the Data Protection Act can be obtained from <https://www.gov.uk/data-protection/the-data-protection-act>

Fair Obtaining

The School undertakes to obtain and process data fairly and lawfully by informing all data subjects of the reasons for the collection of the data, the purposes for which the data is held, the likely recipients of the data and their right to access that data; either under the Education (Pupil Information) (England) Regulations 2005 or the Data Protection Act 1998.

Data subjects will be informed about the collection and use of their data through the use of Privacy Notices, which will be printed on the appropriate collection forms. If these details are given verbally to the data subject, the person collecting the data will explain the issues before obtaining the information.

Registered (Notified) Purposes

The Data Protection Notification entries for the school are available for inspection with the School Secretary. Explanation of any codes and categories entered is available from the Headteacher. Registered purposes covering the data held at the school are listed on the school's Notification to the Information Commissioner. Information held for these stated purposes will not be used for any other purpose without the data subject's consent.

Data Integrity

The school undertakes to ensure data integrity by the following methods:

Data Accuracy – data held will be as accurate and up to date as is reasonably possible. If a data subject informs the school of a change of circumstances, their records will be updated as soon as is practicable. The school has a system to ensure that where a data subject informs the school of a change of their circumstances, that all of the records held on the data subject are updated. Where a data subject challenges the accuracy of their data, the school will check the data, update it and provide a new hard copy to the subject so it can be checked. Data will be checked once per year as a matter of course. In the case of student data this will be sent to parents annually. Parents can also request changes by contacting the school secretary.

Data Relevance – data held about people will be relevant to the purpose for holding the data. The data held will not be excessive in relation to the purpose for which it was collected. In order to ensure compliance with this principle the school will review the data it requires and hold regularly. Data subjects can check such data on request and request for it to be disposed of. This request will be dealt with by the Headteacher.

Length of Time – data held about individuals will not be kept for longer than is necessary for the purposes for which it is held. It is the duty of the School Secretary to ensure that any obsolete data are erased.

Subject Access Requests

The Data Protection Act 1998 extends to all data subjects, a right of access to their own personal data. In order to ensure that individuals receive only information about themselves, it is essential that a formal system for handling requests is in place. The member/s of staff responsible for processing these requests should have an understanding of what information should and should not be released.

Where a subject access request is received from a pupil, the school's policy is that the Headteacher will consider the request and give or withhold permission. Checks will be made to ensure that the person making the request is entitled to the data. Students, parents or staff should ask for the relevant form available from the School Secretary. Completed forms should be submitted to the School Secretary.

Authorised Disclosures

In general, the School will only disclose data about individuals with their consent. However, there are circumstances under which it is necessary for the school's authorised officer(s) to disclose data without express consent of the data subject. These circumstances are limited to:

- Pupil data disclosed to authorised recipients in respect of education and administration necessary for the school to perform its legitimate duties and obligations.
- Pupil data disclosed to authorised recipients in respect of a pupil's health, safety and welfare.
- Data contained within a Pupil's educational record will be disclosed to the child's parents if requested in accordance with Educational (Pupil Information) (England) Regulations 2005.
- Staff data disclosed to the relevant authority in respect of payroll and school's staff administration
- Other disclosures as may prove unavoidable, for example where an incidental disclosure occurs when an engineer is fixing the computer systems. In such cases, the engineer will sign a document to undertake NOT to disclose such data outside the school. Local Authority IT Liaison/Support Officers are professionally bound not to disclose such data. Only authorised and properly instructed staff are permitted to make external disclosures of personal data. Data used within the school by administrative staff, teachers and welfare workers must be made available only if the staff member needs to know the information for their work within the school.

Data and Computer Security

Overall security policy is determined by the Headteacher and will be monitored and reviewed as appropriate and whenever a major security breach or loophole is apparent. The School's security policy is kept in a safe place at all times. Any queries or concerns about security of data within the school should be brought to the attention of the Headteacher. Any deliberate breach of this Data Protection Policy by a member of staff will be treated as a disciplinary matter and serious breaches may lead to dismissal. Further details can be obtained from the Headteacher at the school.

Visitors to the school are required to sign in and out and are, where appropriate, accompanied.

Logical Security

Security software is installed on all computers containing personal data, only authorised users are allowed access to the computer files and password changes are regularly undertaken. Computer files are backed up (i.e. security copies are taken) regularly. Filing cabinets should be kept locked when the room is unattended.

Procedural Security

In order to be given authorised access to the computer, staff will be properly checked and will sign a confidentiality agreement. All staff are trained and instructed in their Data Protection obligations and their

knowledge updated as necessary. Computer printout and source documents are always shredded before disposal. Overall security policy is determined by the Headteacher and will be monitored and reviewed as appropriate and whenever a major security breach or loophole is apparent. The School's security policy is kept in a safe place at all times. Any queries or concerns about security of data within the school should be brought to the attention of the Headteacher. Any deliberate breach of this Data Protection policy will be treated as a disciplinary matter and serious breaches of the Act may lead to dismissal. Further details on any aspect of this policy and its implementation can be obtained from the school.

Policy Reviewed by: S Boyd
Reviewed: September 2021

To be Reviewed: September 2022