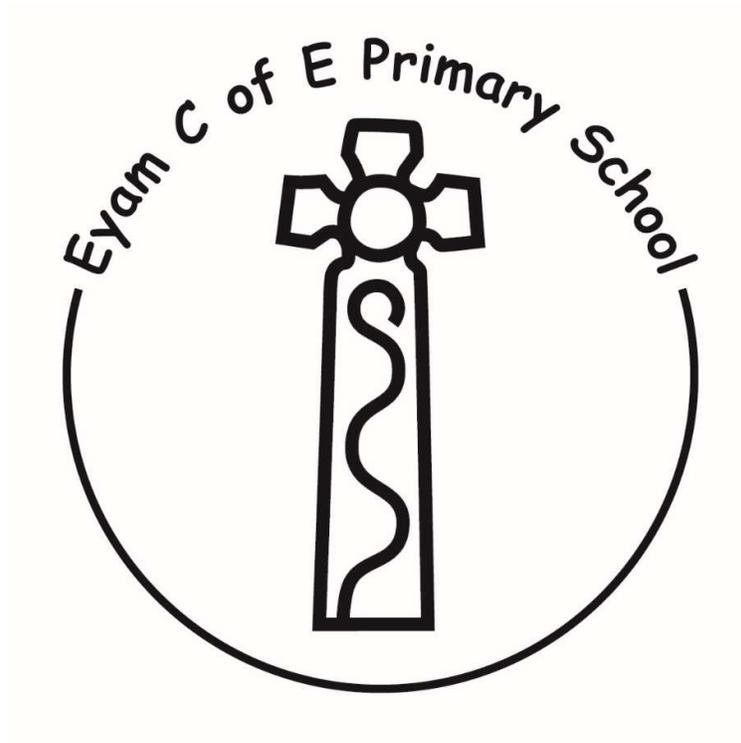


# Eyam C of E Primary School

## Data Protection Policy



Agreed: April 2018

Review Date: September 2020

*Eyam School vision is to be a thriving community built of self-motivated, resilient learners who work together using critical thinking skills to achieve and celebrate success through a culture of respect.*

Signed by \_\_\_\_\_ on behalf of the Governing Body Date \_\_\_\_\_

# Eyam C of E Primary School

## Data Protection Policy

### General Statement

The Headteacher and the Governors of Eyam CE Primary 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 their duties and responsibilities under this policy. 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 Mrs Mason in the School Office or Mrs Gilbertson the Headteacher and general information about the Data Protection Act can be obtained from the Children and Younger Adults Department, County Hall, Matlock DE4 3AG: 01629 532011

### 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. [There is a general Privacy Notice which can be found on the school's website.](#) If these details are given verbally to the data subject the person collecting the data will explain the issues before obtaining the information.

### Registered Purpose

The Data Protection Notification entries for School are available, by appointment, for inspection in the school office. Explanation of the codes and categories entered is available from the Head teacher, who is the person nominated to deal with Data Protection issues in the school. Registered purposes covering the data held at the school are listed on the school's Registration and data collection documents. Information held for these stated purposes will not be used for any other purpose without the data subjects' 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 immediately mark the record as potentially inaccurate (challenged). We shall try to resolve the issue informally but if this is not possible, any disputes will be referred to the Board of Governors for their deliberation.

If the problem is not resolved at this stage independent arbitration may be sought by either side. Until resolved, the challenged marker will remain and all disclosures of the affected information will contain both versions of the information. In order to prevent such problem areas we shall provide data subjects with opportunities to check their data accuracy and request amendments.

**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; consider with care whether the data is needed at all and how it will be collected and stored. There is a data audit which will be reviewed annually to ensure it is up to date and that old data has been destroyed. A data Governor will be appointed to ensure that the Leadership team report this review to the Governing Body. Un needed data will be shredded.

**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 Data Processor (Mrs Mason) to ensure that data in the office has been erased.

## **Subject Access**

The Data Protection Act extends to all data subjects a right of access to their own personal data. In order to ensure that people receive only information about themselves it is essential that a formal system of request is in place. Where a request for subject access is received in respect of a pupil, the school's policy is that:

- Requests from parents/carers of their own child will be processed as requests made on behalf of the data subject (the child) and the copy will be sent in a sealed envelope to the requesting parent.
- Requests from pupils will be referred to the child's parents/carers.

## **Processing Subject Access Requests**

Students/parents should ask for the Subject Access form available from the School Office and Staff should use the Staff Request form available from the Headteacher. Completed forms should be submitted to the School Clerk. Provided that there is sufficient information to process the request, an entry will be made in the Subject Access log book, indicating the date of receipt, data subject's name, name and address of requester (if different), type of data required (e.g. Student Record, Personnel Record), and planned date of supplying the information (not more than 40 days from the request date).

Should more information be required to establish either the identity of the data subject (or agent) or the type of data requested, the date of entry in the log will be the date on which sufficient information has been provided.

## **Authorised Disclosures**

In general, the School will only disclose data about individuals with their consent. However, there are circumstances under which the School's authorised officer(s) will reveal data without express consent. The Schools authorised officers are the Headteacher, /Child Protection Officer.

These circumstances are strictly limited to:

- Pupil data disclosed to authorised recipients in respect of education and administration necessary for the school to perform its statutory duties and obligations.
- Pupil data disclosed to authorised recipients in respect of a child's health, safety and welfare.
- Pupil data disclosed to parents in respect of their child's progress, attendance, attitude and general demeanour within, and in the vicinity of the school.
- Staff data disclosed to relevant authorities in respect of payroll and schools' 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 promise NOT to disclose such data outside the school. Education Authority IT liaison/Support Officers are professionally bound not to disclose such data.

Any request for disclosure of information will be referred to the schools authorised officers. Only authorised and properly instructed staff are allowed 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**

Eyam CE Primary School undertakes to ensure security of personal data by the following general methods - (for security reasons we cannot reveal precise details in this document)

#### **Physical Security**

Appropriate building security measures are in place, such as alarms, lockable doors and cabinets and computer hardware cable locks, e.g. projector box cable. Only authorised persons are allowed in the office/staff room. Disks, tapes printouts and files are locked away securely when not in use. 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**

Access to computer records is restricted to the School Clerk and Headteacher only. All staff are trained and instructed in their Data Protection obligations and their knowledge updated as necessary. Computer printouts and source documents are always shredded before disposal.

Overall security policy is determined by the Headteacher in conjunction with the Governing Body and will be monitored and reviewed as appropriate and whenever a major security breach or loophole is apparent. Any queries or concerns about security of data within the school should be brought to the attention of the Headteacher.

Individual members of staff can be liable in law under the terms of Act. They may also be subject to claims from persons harmed as a result of inaccuracy, unauthorised use or disclosure of their data. Any deliberate breach of this Data Protection Policy will be treated as disciplinary matter and serious breaches of the Act may lead to dismissal.

### **Enquiries**

Further information about the School's Data Protection Policy is available from the School Clerk and general information about the Data Protection Act can be obtained from the Derbyshire Education Departments Data Protection Liaison Officer at County Hall – 01629 580000 ext 6501