



Data Protection Policy

2016-2017

Governor Lead:	None
Nominated Lead Member of Staff:	Bursar (Data Protection Officer)
Status & Review Cycle:	Statutory (Bi-annual Review) (Must register with Information Commissioner Annually Z609044X)
Last Review Date:	August 2016
Next Review Date:	August 2018

Principles

For the purpose of the Data Protection Act 1998 (“the DPA”), North Cestrian School (“The School”) is the “data controller” of personal data about pupils and their parents. Although this policy is mainly directed at pupils and parents, the rules and principles regarding personal data also apply to employees.

Parent has the meaning of any person having parental responsibility or care of a child. *Personal data* means data which relates to a living individual who can be identified.

The school intends to fully comply with the relevant data protection acts. All members of staff involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities within these guidelines. Personal data processed by the School includes contact details, national curriculum and other assessment results, attendance information, special educational needs, and images of pupils engaging in School activities (and in relation to parents

and/or guardians, may include financial information). The School may also process sensitive personal data such as ethnic group, religious beliefs and relevant medical information.

Under the DPA 1998, the main principles are that data must be:

- fairly and lawfully processed (ie what it is used for)
- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with data subject's rights
- secure

Compliance

School registers annually with the Information Commissioner's Office. Information is available at www.ico.org.uk

Data Processing

North Cestrian will obtain data and process fairly and lawfully and will inform parents of the reasons for the data collection, the likely recipients of the data and the use to which the data will be put.

Typically this will involve:

Obtaining

- Personal data will usually be collected directly from parents or pupils, but some may be passed to the School by third parties.
- Biometric data will be held from pupils for the purpose of lunch payments. If this use is widened, we will inform parents.

Processing

- Your personal data (including sensitive personal data, where appropriate) is processed by the School strictly in accordance with the Data Protection Act in order to:
 - support its pupils' teaching and learning
 - monitor and report on their progress
 - publish examination results
 - provide appropriate pastoral care
 - assess how well the School as a whole is doing
 - communicate with former pupils
 - monitor pupils' email communications, internet use for the purpose of ensuring compliance with the School Rules, and strictly in accordance with the School's Acceptable Use of ICT policy
 - where appropriate, promote the School to prospective pupils (including through the School's prospectus and website)
 - other reasonable purposes relating to the operation of the School. Unless you have requested otherwise by contacting the School Secretary the School may also use

your contact details to send you promotional and marketing information by post, email, SMS and other electronic means about the School and about carefully selected third parties.

Data Integrity

School will try to ensure data held about pupils, parents and staff is as accurate and up to date as reasonably possible. We request all data subjects to inform school of any changes to information held, and offer frequent reminders to data subjects to do this. Additionally, data record sheets are reviewed annually and parents are asked to update and check the data collection sheets. School will only gather and process that data that it considers necessary to carry out its educational purposes effectively. Data will not be held longer than is necessary and will ensure after that it is properly erased.

Access to Data

In addition to a right of access to educational records, data subjects have the right to request the personal information a school holds about them. In order to ensure the information given out is accurate and that it does not provide details of others, there is a formal means of requesting such information. A standard fee of £10.00¹ is charged for this request. Pupils may also make such requests providing it is clear the pupil understands the nature of the request. School will aim to provide the data no more than 40 calendar days from the request date. A pro-forma Personal Data Request form is available from school for this purpose, if you wish. A log will be made of such requests.

Disclosures

School will normally only disclose data to third parties about individuals with their consent. However, disclosure may be made without consent where:

- it is to authorised recipients related to the school carrying out its statutory duties and obligations
- it is to authorised recipients in respect of the pupil's health, safety and welfare
- (for staff) it is to relevant authorities in respect to payroll, administration, safeguarding matters
- It is unavoidable eg during IT maintenance. In this case the relevant party would be expected to be bound to not disclose personal data.

Examples:

Third parties with whom the School may need to share personal data:

From time to time the School may pass your personal data (including sensitive personal data where appropriate) to third parties, including local authorities, other public authorities, school bodies such as Ofsted, health professionals and the School's professional advisers, the government's ContactPoint and Connexions services; and otherwise where reasonably necessary for the operation of the School. The School may also (unless you request otherwise) share

¹ Information Commission Office guidance

personal data about former pupils with any association, society or club set up to establish or maintain relationships with alumni of the School, who may contact alumni from time to time by post, email and SMS about the School and its activities, and for promotional and marketing purposes on behalf of the School. All these are data controllers in respect of the personal data they receive, and must themselves comply with the Data Protection Act 1998.

Data Security

- Physical security: personal files are kept in rooms out of bounds to visitors and pupils and only authorised staff have access to more sensitive files. All visitors are required to sign in at reception and carry identification badges.
- Password protection: data installed on computers can only be accessed by passwords.
- Files are backed up regularly.
- Staff computer tablets have remote lock down to prevent unauthorised data access
- Staff receive updates on the need to be data compliant and to be data protection aware eg closing down computer terminals when not in use. Deliberate breaches of the data protection policy are treated very seriously and are treated as a disciplinary matter; serious breaches could lead to dismissal.