



## ALDERMAN JACOBS PRIMARY SCHOOL (ACADEMY TRUST)

### DATA PROTECTION POLICY

#### 1. Statement of Commitment

In order to undertake its statutory obligations effectively, deliver services and meet stakeholders requirements, Alderman Jacobs School (Academy Trust) needs to collect, use and retain information, much of which is confidential. Such information may be about:

- Our pupils and parents.
- Our employees or their families.
- Members of the public.
- Members of Alderman Jacobs School.
- Business partners.
- Other local authorities or public bodies.

We regard the lawful and correct treatment of personal data by Alderman Jacobs School ((Academy Trust) (referred to hereafter as Alderman Jacobs School)) as very important for successful operations, and to maintain the confidence of our stakeholders.

To this end, Alderman Jacobs School will ensure compliance, in all its functions, with the Data Protection Act 1998 (referred to hereafter as the DPA 1998) and other relevant legislation.

#### 2. Compliance with the Principles

The Principles of the DPA 1998 state that personal information must be:

- Processed fairly and lawfully and, in particular, shall not be processed unless specific conditions (detailed in the DPA 1998) are met;
- Obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose/those purposes;
- Adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed;
- Accurate and, where necessary, kept up to date;
- Kept only for as long as is necessary for that purpose or those purposes;

- Processed in accordance with the rights of data subjects under the DPA 1998;
- Kept secure and appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data; and,
- Transferred only to a country or territory outside the European Economic Area that ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

In order to comply with these principles Alderman Jacobs School will:

- Observe and comply with the conditions regarding the fair collection and use of personal data;
- Specify the purpose for which personal data is used;
- Only collect and process appropriate personal data to the extent that it is needed to fulfil operational needs or to comply with legal requirements;
- Ensure the quality of data used;
- Apply strict checks to determine the length of time information is held;
- Ensure that the rights of individuals about whom the data is held can be fully exercised under the DPA 1998;
- Take appropriate security measures to safeguard personal information; and,
- Ensure that personal data is not transferred outside of the country without suitable safeguards.
- As Alderman Jacobs School is a data controller it will notify (register with), annually, the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk))

### **3. Compliance with the Principles continued**

In addition Alderman Jacobs Primary School will ensure that:

- The Headteacher is the appointed officer with responsibility for Data Protection;
- Employee and Member training needs will be identified and training provided, where appropriate, to ensure that those managing and handling personal information understand their responsibility to follow good data protection practice; and,
- A regular review and audit of the use of personal data will be undertaken to ensure compliance with the DPA 1998.

### **4. Responsibilities of Staff**

All staff are responsible for:

- Checking that any information that they provide to the School in connection with their employment is accurate and up to date.
- Informing the School of any changes to information that they have provided, e.g. change of address, either at the time of appointment or subsequently. The School cannot be held responsible for any errors unless the staff member has informed the School of such changes.

If and when, as part of their responsibilities, staff collect information about other people (e.g. about a pupil's course work, opinions about ability, references to other academic

institutions, or details of personal circumstances), they must comply with the guidelines for staff set out in the Schools Data Protection Code of Practise.

## **5. Data Security**

All staff are responsible for ensuring that:

- Any personal data that they hold is kept securely.
- Personal information is not disclosed either orally or in writing or via Web pages or by any other means, accidentally or otherwise, to any unauthorised third party.

Staff should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases.

Personal information should:

- Be kept in a locked filing cabinet, drawer, or safe; or
- If it is computerised, be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up; and
- If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe

## **6. Rights of the Individual**

All staff, parents and other users are entitled to:

- Know what information the School holds and processes about them or their child and why.
- Know how to gain access to it.
- Know how to keep it up to date.
- Know what the School is doing to comply with its obligations under the 1998 Act.

This Policy document and the School's Data Protection Code of Practise address in particular the last three points above. To address the first point, the School will, upon written request, provide all staff and parents and other relevant users with a statement regarding the personal data held about them. This will state all the types of data the School holds and processes about them, and the reasons for which they are processed.

All staff, parents and other users have a right under the 1998 Act to access certain personal data being kept about them or their child either on computer or in certain files. Any person who wishes to exercise should submit their request to the Designated Data Controller.

The School will make a charge of £10 on each occasion that access is requested, although the School has discretion to waive this.

The School aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days, as required by the 1998 Act.

Methods of handling data will be clearly described and queries about the handling of personal information will be dealt with promptly and courteously.

The Governing Body shall ensure compliance with the policy. If any persons acting on Alderman Jacobs School's behalf, are found to knowingly or recklessly breach Alderman Jacobs School's Data Protection Policy appropriate disciplinary and/or legal action shall be taken.

<del>Non-Statutory</del> <b>Statutory</b>							
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By	Date	By	Date			Head	Chair
Cathy Carlisle	Summer 2017	Resources Committee	24 May 2017	2 Years	Summer Term 2019	<i>Cathy Carlisle</i>	<i>Atlland</i>