

# **RIPPLE PRIMARY SCHOOL**

## **DATA PROTECTION POLICY**

### **1. Introduction**

1.1 The Governing Body of the school has overall responsibility for ensuring the records are maintained, including security and access arrangements, in accordance with Education Regulations and all other statutory provisions.

1.2 The Headteacher and Governors of this school are intent to comply fully with the requirements and principles of the Data Protection Act 1998. Further information about the Data Protection Act can be obtained from the Data Protection Commissioner ([www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)).

### **2. Data Gathering**

2.1 All personal data ('data which relates to a living individual who can be identified' e.g. address, telephone numbers, names, photographs) relating to staff, pupils or other people with whom we have contact, whether held on computer or in paper files, is covered by the Act.

2.2 Only relevant personal data may be collected and the person from whom it is collected should be informed of the data's intended use and any possible disclosures of the information that may be made.

2.3 The School will check annually that the data collected is still adequate, relevant and not excessive in relation to the purpose for which the data is being held.

2.4 Likewise data will not be kept for longer than is necessary. Computer printouts, as well as source documents, are shredded before disposal.

### **3. Data Storage**

3.1 All personal data will be stored in a secure and safe manner.

3.2 Electronic data will be protected by standard password systems operated by the school.

3.3 Computer workstations in administrative areas are positioned so that they are not visible to casual observers waiting either in the office or reception area.

3.4 No personal data (except names) will be held on teaching staff laptops.

3.5 Manual data will be stored where it is not accessible to anyone who does not have a legitimate reason to view or process the data.

## **4. Data Checking**

4.1 Data held will be as accurate as is reasonably possible.

4.2 The school will issue regular reminders to staff and parents to ensure that data held is up-to-date and accurate.

4.3 If a parent ('a person having parental responsibility or care of a child', Education Act 1996) informs the school of a change in circumstances the computer record will be updated as soon as is possible.

## **5. Access to Records**

5.1 Requests for access to personal data must be made in writing to the headteacher. It must include key information (e.g. full name, address and telephone number) in order for the school to verify the request.

5.2 Pupils, parents and staff may request access to the personal data held about them by the school.

5.3 Provided that there is sufficient information to process the request this will be done within 40 days of the request. In the case of any written request from a parent regarding their own child's record, access to the record will be provided within 15 school days in accordance with the current Education (Pupil Information) Regulations.

5.4 All personal data will be sent to the requesting person in a sealed envelope.

5.5 Where a request is made by a pupil it is our policy that requests from pupils will be processed as any personal data request (as above) unless it is clear that the pupil does not understand the nature of the request.

## **6 Data Disclosures**

6.1 Personal data will only be disclosed to organisations or individuals for whom consent has been given to receive the data, or organizations that have a legal right to receive the data without consent being given.

6.2 When requests to disclose personal data are received by telephone it is the responsibility of the school to ensure the caller is entitled to receive the data and that they are who they say they are. It is advisable to call them back, preferably via a switchboard, to ensure the possibility of fraud is minimised.

6.3 If a personal request is made for personal data to be disclosed it is again the responsibility of the school to ensure the caller is entitled to receive the data and that they are who they say they are. If the person is not known personally, proof of identity should be requested.

6.4 Personal data will not be used in newsletters, websites or other media without the consent of the data subject.

6.5 Routine consent issues will be incorporated into the school's pupil data gathering sheets, to avoid the need for frequent, similar requests for consent being made by the school.

6.6 Personal data will only be disclosed to Police Officers if they are able to supply a WA170 form which notifies of a specific, legitimate need to have access to specific personal data.

6.7 A record should be kept of any personal data disclosed so that the recipient can be informed if the data is later found to be inaccurate

## **7. Data and Computer Security**

The School undertakes to ensure the security of personal data by the following general methods (exact details, cannot, of course, be listed):

### **7.1 Physical Security**

Appropriate building security measures are in place (alarm, lockable office). All disks, tapes and printouts are locked away securely when not in use. Visitors to the school are required to sign in, to wear identification badges and, where appropriate, are accompanied.

### **7.2 Logical Security**

Only authorised users are allowed to access the computer files and password changes are undertaken regularly. Computer files are backed up regularly.

### 7.3 Procedural Security

All staff are aware of their Data Protection responsibilities and the procedures in place for accessing personal data. These procedures are monitored and reviewed on a regular basis, especially if a security loophole becomes apparent.

## 8. Responsibility

8.1 Individual members of staff can be personally liable in law under the terms of Data Protection Acts.

8.2 A deliberate breach of this policy will be treated as a disciplinary matter. Any queries or concerns about the security of data in school should, in the first instance, be referred to the Headteacher.

Approved by the Chair of Governors:

Date: .....

Signed: .....

