

# Data Protection Policy

## ST JAMES CE PRIMARY SCHOOL

### 1. **Statement of Intent**

It is the intention of the (name of School) to fulfil its obligations under the Data Protection Act 1998 (DPA 1998). The School will ensure that the Information Commissioner is informed of all the uses that information is put to, and will conduct periodic reviews and update those entries. It is the aim of the School that all appropriate staff are properly trained, fully informed of their obligations under the DPA 1998 and are aware of their personal liabilities.

Any employee deliberately acting outside of their recognised responsibilities may be subject to the school's disciplinary procedures.

Individuals whose information is held and processed by the school can be assured that the school will treat their personal data with all due care. This policy document applies only to information covered by the DPA and relevant legislation impacting upon it. This policy will be a dynamic document that will be updated periodically according to the laws of England and Wales.

### 2. **Fair Obtaining and Processing**

The School will, as far as practicable, ensure that all individuals whose details are held are aware of the way in which that information will be held, used and disclosed. Individuals will, where possible, be informed of the likely recipients of the information - whether the recipients are internal or external to the School. Processing within the School will be fair and lawful, individuals will not be misled as to the uses to which the School will put the information given. If a person feels they have been deceived or misled as to the reasons for which their information was collected, they should complain using the school's complaints procedure.

It is recommended that forms requiring personal information will contain a "fair obtaining" statement giving details of the likely uses of the information. People are free to ask the person collecting the information why the information is required.

### 3. **Information Uses and Processes**

The School will not use or process personal information in any way that contravenes its notified purposes or in any way that would constitute a breach of data protection law. Any new purposes introduced will, where appropriate, be notified to the individual and - if required by the law - their consent will be sought. Copies of notifications by the School can also be viewed on the Information Commissioner's web site at [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)

It is recommended that all staff using personal information within the School are told the limits of their authority to use and disclose such information. The School has a reporting structure headed by **Mrs A Passmore** who will ensure

that data protection policies and procedures are properly communicated throughout the School; and all new purposes are documented and notified to the Information Commissioner.

#### 4. **Information Quality and Integrity**

The School will not collect information from individuals where that information is excessive or irrelevant in relation to the notified purpose(s). Details collected will be adequate for the purpose and no more. Personal data, which becomes irrelevant or excessive will be deleted.

Information will only be held for as long as is necessary for the notified purpose(s). Where details of individuals are stored for long-term archive or historical reasons and where it is necessary to retain the personal detail within the records it will be done within the requirements of the legislation.

The School will ensure, as far as is practicable, that the information held is accurate and up to date. It is the intention of the School to check wherever possible the details given. It is recommended that information received from third parties (i.e. neither the individual concerned nor the School) should carry a marker indicating the source. Where a person informs the School of a change of their own circumstances, such as home address or non-contentious data, their record(s) will be updated as soon as possible. Where the individual requests that information be changed and it is not possible to update it immediately, or where the new information needs to be checked for its accuracy or validity, it is recommended that a marker be placed on the disputed record indicating the nature of the problem.

#### 5. **Technical and Organisational Security**

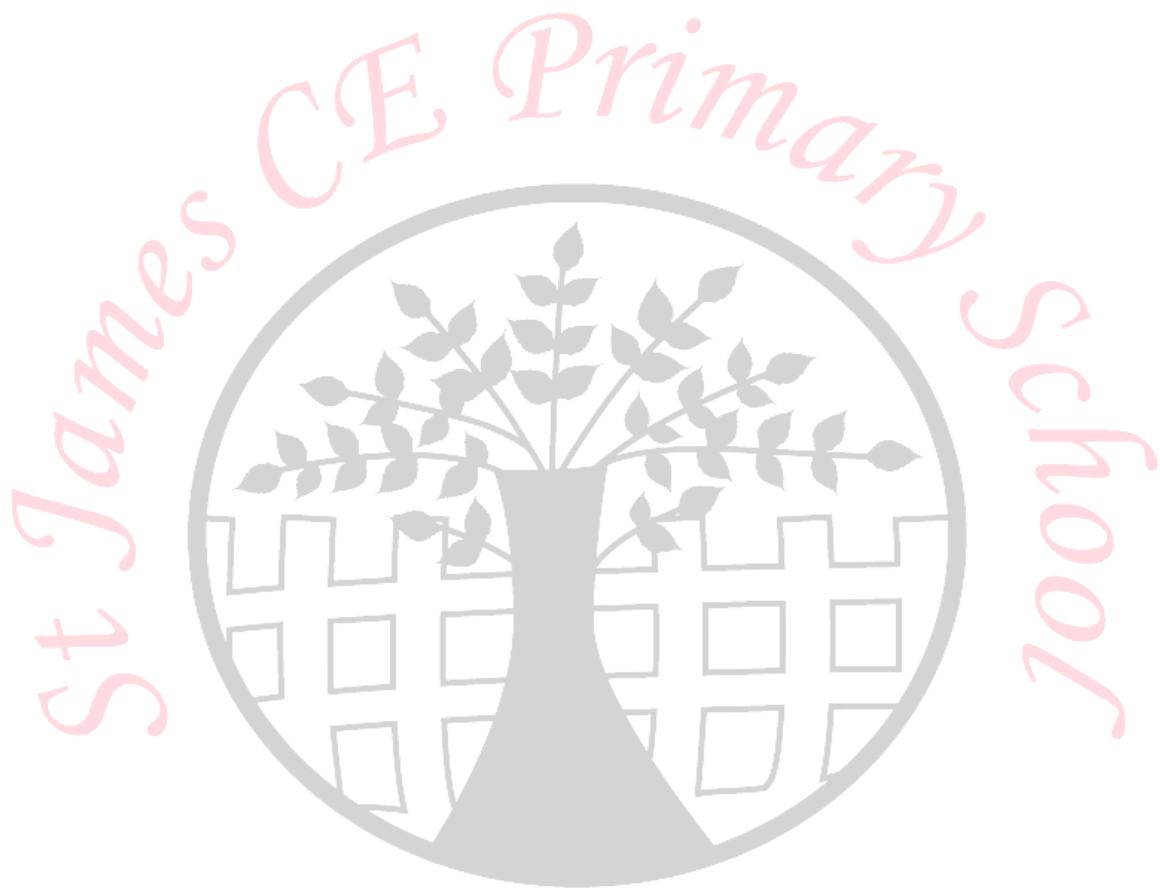
The School should implement appropriate security measures as required under the DPA 1998. In particular, unauthorised staff and other individuals should be prevented from gaining access to personal information. Appropriate physical security should be in place with visitors being received and supervised at all times within the School's buildings where information about individuals are stored.

Computer systems are installed with *user-type profile type* password controls and, where necessary, audit and access trails to establish that each user is fully authorised. In addition, employees should be fully informed about overall security procedures and the importance of their role within those procedures. Manual filing systems should be held in secure locations and only accessed on a need-to-know basis.

It is recommended that all staff are informed about the limits of their authority on disclosing information both inside and outside of the School. Details should only be disclosed on a needs basis within the School. Where details need to be passed outside the School, it should generally be done with the person's consent except where this is not possible or where required by law, allowed under the Data Protection Act exemptions or where it is in the person's vital interests.

## 6. **Subject Access/Subject Information Requests**

Any person whose details are held / processed by the School has a general right to receive a copy of their own information. There are a few exceptions to this rule, such as *information held for child protection or crime detection/prevention purposes*, but most individuals will be able to have a copy of the information held on them. Any codes used in the record will be fully explained and any inaccurate, out of date, irrelevant or excessive information will be dealt with accordingly.



## Mobile IT Equipment (Laptop) Policy

### ST JAMES CE PRIMARY SCHOOL

#### Introduction

This policy has been produced to outline to members of staff the School's policies on the use of IT equipment supplied for the purposes of working away from the office either at home or at other locations.

This policy may draw on existing policies that have been established for the use of all IT equipment.

#### General Use

Any equipment supplied for the purposes of working away from the school should be used for the School's work purposes only. All equipment remains the property of the School otherwise it becomes a taxable benefit. The equipment must not be used to produce any material that is defamatory or for any purposes that would bring the School into disrepute.

Use of the Internet must be in accordance with the School's general policy on Internet use; this is contained in the Schools Policy.

The use of e-mail is subject to the same policy as the use of e-mail in the school.

All data on Mobile Equipment remains the property of the School and should be dealt with confidentially and should not be shared with any unauthorised persons. Personal back-up copies of data should not be kept at home.

**Any use of data on Mobile Equipment is governed by the Data Protection Act 1998. The Act makes no distinction between those working from home or alternative premises to those working in offices. When working from home, care must be taken when handling School data to keep work-life and domestic-life separate.**

Any data held on Mobile Equipment should be kept up-to-date and frequently reviewed; any copies of central data should be identical and accurate.

Data on Mobile Equipment should only be used for the purpose for which it was collected - this is in compliance with the Schools existing Data Protection notification.

Equipment is subject to the same Health and Safety requirements as equipment used in the school.

#### Security

Equipment used away from the school is treated with the same care as any personal valuable item. At home, equipment should be placed where it cannot be seen from outside, certainly away from windows and out of sight of casual visitors.

Mobile It Equipment should ideally have security access controls such as passwords to prevent unauthorised users such as family members using School equipment for their own purposes, and having access to any School and personal data.

In addition, it is important to note that IT equipment that is taken out of the office should not be left unattended on show in a motor vehicle. If you do take equipment out of the office and have to stop off on the way to your destination then the equipment must be stowed securely in the boot of the vehicle or taken with you.

Any loss or theft of equipment should be reported to the Head Teacher as soon as possible.

The use of unauthorised media and software is strictly prohibited. The spread of viruses is on the increase and the use of unauthorised or pirated media/software is a common method of infection.

### **Confidentiality**

Staff will not normally be allowed to remove confidential information held in electronic format from the workplace.

Where removal of confidential information held in electronic format from the workplace is deemed necessary, it must be authorised by the Head or Deputy Head Teacher and agreed procedures for transportation and storage must be made before such removal.

- (a) Such information must only be stored/processed on electronic equipment which is the property of the school.
- (b) Extra care must be taken when transporting electronic equipment containing such information in public places in order to minimise the theft of such equipment.
- (c) Not to leave any electronic equipment containing such information unattended in a public place or car.
- (d) Not to read or process such information on public transport or in a public place.
- (e) Whilst at home, keep such information from other members of the household.

The loss, theft or unauthorised use of confidential information must be regarded as an extremely serious matter and must be reported to the Head Teacher immediately.

Any loss or theft of confidential information must be reported to the police, emphasising the confidential nature and the importance of such information being returned unread if found.

### **Insurance**

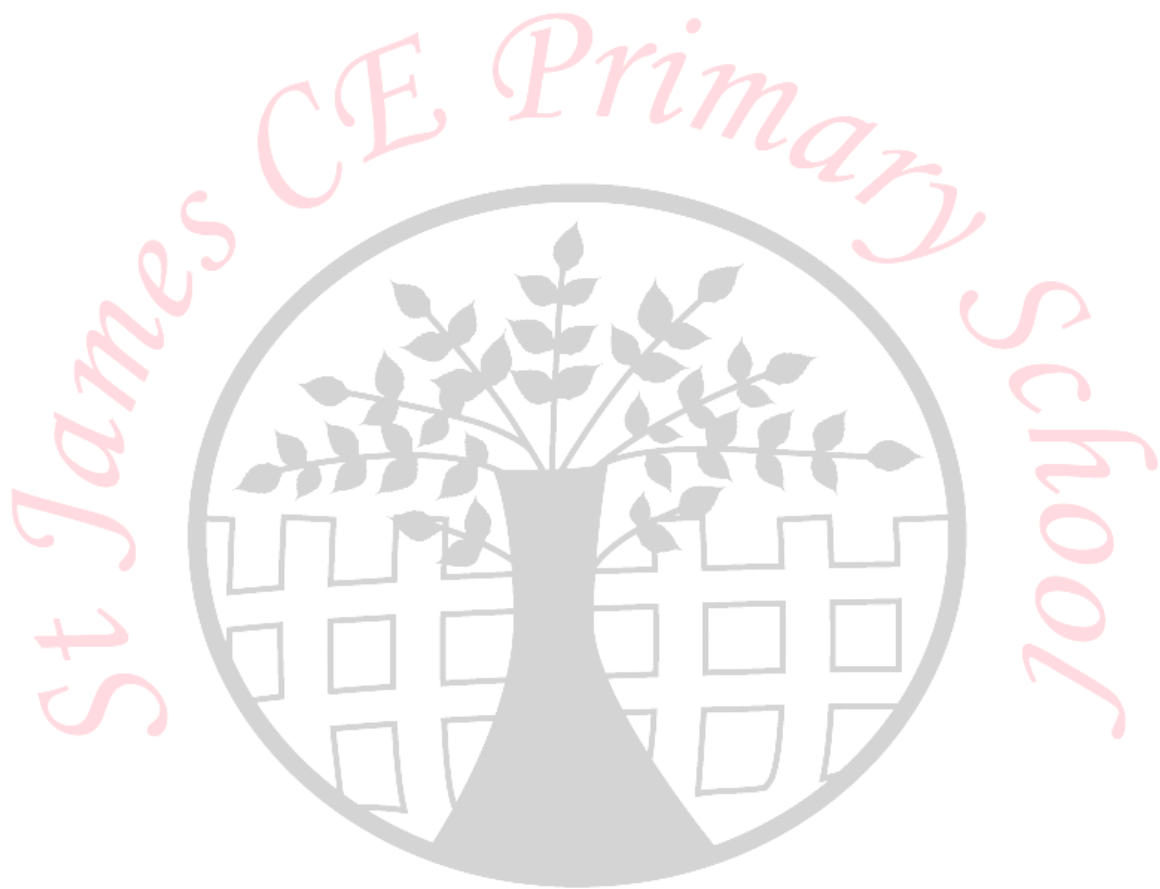
Insurance cover is part of Local Authority Policy.

*Declaration*

I declare that I have read and agree to the terms and conditions of this policy and the policies referred to in it. I confirm that I will take all reasonable steps to ensure the safety and security of the equipment and the equipment will only be used in accordance with the School's policies.

Signed:

Date:



## Consent Form

### St James CE Primary School

To the Parent or Guardian of:

Name of child:

School:

St James CE Primary School may want to use photographs of your child. These photographs may appear in our printed publications, on our website, or both.

***Before using any photographs of your child, we need your permission. Please answer questions 1 and 2, and then sign and complete the form below.***

Please return this form to Mrs McGregor at School as soon as possible.

1.	May we use your child's photograph in printed publications produced by (name of school)?	Yes/No*
2.	May we use your child's photograph on the School's website?	Yes/No*

*\*Please delete as appropriate*

(Please note that websites can be viewed throughout the world, not just in the United Kingdom where UK law applies).

Signature:

Name

Relation to child:

Date:

Please return this form to the school.

## Consent Form for External Publications

### St James CE Primary School

To the Parent or Guardian of:

Name of child:

School:

The ..... Newspaper would like to use photographs of your child. These photographs may appear in printed publications, on their website, or both.

***Before using any photographs of your child, we need your permission. Please answer questions 1 and 2, and then sign and complete the form below.***

Please return this form to Mrs C McGregor at School as soon as possible.

1.	Newspaper) may we use your child's photograph in printed publications produced	Yes/No*
2.	(Newspaper) may we use your child's photograph on the their website?	Yes/No*

(Please note that websites can be viewed throughout the world, not just in the United Kingdom where UK law applies).

This form is valid for the use of the photograph taken by the ..... Newspaper.

Signature:

Name

Relation to child:

Date:

Please return this form to the school.

### Further References

#### Website of the Information Commissioner

[www.informatoncommissioner.gov.uk](http://www.informatoncommissioner.gov.uk)



The information Commissioner enforces the Data Protection Act 1998 and his website has a vast amount of information on how to ensure data protection compliance as well as the latest developments in this area.

### **Department for Constitutional Affairs (DCA)**

[www.dca.gov.uk](http://www.dca.gov.uk)

The DCA have taken a lead within Central Government in promoting the lawful sharing of personal data within the public sector and their website contains a great deal of useful advice.

### **Further advice**

Schools can seek Data Protection advice from

Martin Parsons  
Strategic EMS Manager  
EMS Support Unit  
0121 569 8289

[martin\\_parsons@sandwell.gov.uk](mailto:martin_parsons@sandwell.gov.uk)

If schools have specific questions in respect of this guidance, please contact:

Nigel Parr  
Data Protection/Freedom of Information Officer  
Democratic Services  
Sandwell Metropolitan Borough Council  
Freeth Street  
Oldbury  
B69 3DE  
0121 569 3248

[nigel\\_parr@sandwell.gov.uk](mailto:nigel_parr@sandwell.gov.uk)

