



Pinewood Infant School Data Protection Policy

Pinewood Infant School collects and uses personal information (referred to in the Data Protection Act as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is registered as a Data Controller, with the Information Commissioner's Office (ICO). Details are available on the ICO website.

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the Data Protection Act 1998, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored and whether it is held on paper or electronically.

All school staff and governors involved with the collection, use, processing or disclosure of personal data will be aware of their duties and responsibilities and will adhere to this policy.

What is Personal Information/ data?

Personal information or data is information which relates to a living individual who can be identified from that data, or from that data in addition to other information available to them. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

What is Sensitive Personal Data?

Sensitive personal data includes information as to an individual's racial or ethnic origin, their political opinions, religious beliefs or beliefs of a similar nature, whether they are a member of a trade union, their physical or mental health or condition, sexual life, the commission or alleged commission of an offence and any proceedings for an offence committed or alleged to have been committed by them, the disposal of those proceedings or the sentence of any court in such proceedings.

Data Protection Principles

The Data Protection Act 1998 establishes eight principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for one or more specified and lawful purpose;
3. Personal data shall be adequate, relevant and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data processed for any purpose shall not be kept for longer than necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of data subject under the Data Protection Act 1998;
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security;
8. Personal data shall not be transferred to a country or territory outside the

European Economic Area, unless that country or territory ensures an adequate level of data protection.

Commitment

Pinewood Infant School is committed to maintaining the above principles at all times. Therefore we will:

- Inform individuals why personal information is being collected.
- Inform individuals when their information is shared, and why and with whom unless the Data Protection Act provides a reason not to do this.
- Obtain consent before processing Sensitive Personal Data, even if consent is implied within a relevant privacy notice, unless one of the other conditions for processing in the Data Protection Act applies.
- Check the accuracy of the information we hold and review it at regular intervals by sending out a Data Collection sheet taken from our school information system (SIMS) to all parents once a year (usually in January) so that parents can advise us of any information that we hold that may be inaccurate or out of date.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in. Electronic information regarding children is held on the computer system which is password protected and information regarding staff and sensitive information regarding staff and children is password protected and limited to four members of staff only – The Head, Deputy and the two office administration staff. Paper records are kept in a variety of places but at night are locked away in the Headteacher's filing cabinet or in the office cupboard.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded. Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information, known as Subject Access Requests. (See separate section below)
- Ensure that personal information is not transferred outside the EEA without the appropriate safeguards
- Ensure all staff and governors are aware of and understand these policies and procedures. This is done by ensuring the data protection policy is circulated annually to all staff and to Governors. All staff, students, Governors and volunteers sign a declaration of confidentiality so they understand the importance of not disclosing out of school any information they may hear in school.

Fair Processing

To comply with the first and second principles of the act we provide a Privacy Notice (also known as a fair processing notice). This summarises the information held on pupils, why it is held and the other organisations to whom it may be passed on.

We have one for parents and one for staff and they are based on the Hampshire model. The parents' one is given to all new parents when their child starts at Pinewood Infant School. Existing parents are provided with a new copy if there are any subsequent changes. Similarly members of staff are provided with a new one when they start and when there are any changes.

We control access to personal information to those staff who require particular information for their role. On occasions Governors may require specific information about staff – this information is given at a Governors' meeting and is recorded in "confidential" minutes which are not accessible to all and are kept in a locked cupboard.

Electronic personal data

The school's IT system is controlled by Harrap ICT. Staff are regularly prompted to change passwords which require at least one number and one capital letter. Computers automatically lock after 10 minutes to avoid the possibility of unauthorised access. Teachers laptops maybe be taken from the premises but data should not be saved on individual computers. Staff should use their encrypted key to remotely access the school system. Memory sticks can be taken to and from school but if personal information is being used then these must be encrypted.

Use of private computer equipment

On the rare occasions when private computers are used in school they will not be used to store personal information about children or members of staff.

Paper based personal data

Whenever possible paper based data is kept in a locked cupboard or locked filing cabinet. Papers containing confidential personal information should not be left on office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access. As with memory sticks particular care should be taken if documents have to be taken out of school.

Subject access requests

Section 7 of the DPA gives individuals the right to request the personal information a school holds about them. This is known as a subject access request (SAR) and it needs to be answered within 40 calendar days of receipt. We are able to charge a fee and the request must be in writing and can include a fax or e-mail request. We need to confirm the requester's identity and a log is to be kept of the requests that require formal consideration

Subject access rights under the DPA are separate to the right of access to education records under the Pupil Information Regulations for England, Northern Island, Scotland and Wales, which give a parent the right to information in their child's education record.

Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by the Headteacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Debbie Cook on 01252 511885 who will also act as the contact point for any subject access requests.

Responsibility:	Resources and Premises
Review cycle:	2 years
Date Agreed:	11 th November 2015
Next Review Date:	November 2017