

Hanson School

Privacy Notice and Data Protection Policy

May 2015

Prepared by (members of staff): <ul style="list-style-type: none">• D Watkin (Deputy Principal)	Date: May 2015
Approved by Governing Body Sub-Committee: <ul style="list-style-type: none">• Interim Executive Board	Date: June 2015
Ratified by Full Governing Body: <ul style="list-style-type: none">• Interim Executive Board	Date: June 2015
Signed off by Chair of Governing Body:	Date: May 2015

Privacy Notice - Data Protection Act 1998

We, Hanson School, are a data controller for the purposes of the Data Protection Act. We collect information from you and may receive information about you from your previous school and the Learning Records Service. We hold this personal data and use it to:

- Support your teaching and learning;
- Assess how well your school is doing.

This information includes your contact details, national curriculum assessment results, attendance information and personal characteristics such as your ethnic group, any special educational needs and relevant medical information. If you are enrolling for post 14 qualifications we will be provided with your unique learner number (ULN) by the Learning Records Service and may also obtain from them details of any learning or qualifications you have undertaken.

We will not give information about you to anyone outside the school without your consent unless the law and our rules allow us to.

We are required by law to pass some information about you to the Department for Education (DfE) and, in turn, this will be available for the use(s) of the Local Authority. If you want to see a copy of the information about you that we hold and/or share, please contact the Director of Resources.

If you require more information about how the Local Authority (LA) and/or DfE store and use your information, then please go to the following websites:

Bradford Schools Online

What the Department for Education does with pupils' and children's data

If you are unable to access these websites we can send you a copy of this information. Please contact the LA or DfE as follows:

- Information Management Team

City of Bradford MDC

Future House

Bolling Road

Bradford

BD4 7EB

Website: Bradford Schools Online

Email tom.beaumont@bradford.gov.uk

Phone: 07582 109278 Ratified by Governors – November 2014 Page 3

Hanson School Data protection Policy

- Public Communications Unit Department for Education Sanctuary Buildings Great Smith Street London SW1P 3BT

Website: www.education.gov.uk

email: <http://www.education.gov.uk/help/contactus> Telephone: 0370 000 2288

In addition for Secondary and Middle deemed Secondary Schools

Once you are aged 13 or over, we are required by law to pass on certain information to the provider of youth support services in your area. This is the local authority support service for young people aged 13 to 19 in England. We must provide the address of you and your parents (and your date of birth) and any further information relevant to the support services' role. However, until you are aged 16 or older, your parent(s) can ask that no information beyond your name, address and date of birth (and their name and address) be passed on to the youth services provider. This right transfers to you on your 16th birthday. Please inform the Director of Resources if this is what you or your parents wish.

DATA PROTECTION POLICY

The Governing Body of Hanson School has overall responsibility for ensuring that data collected for use by the school conforms to the requirements of the Data Protection Act. Under the provisions of the Data Protection Hanson School is registered with the Information Commissioner's Office for the purposes of capturing and using personal information.

Hanson School's Registration entry number is **Z246644X** and can be viewed in full on the Information Commissioner's Office website (<http://ico.org.uk/ESDWebPages/DoSearch>) (see Appendix 1). This registration entry details the information collected, the purposes for which it will be used and the people/organisations with whom it will be shared.

The Data Protection Act requires that the school must:

- Only collect information it needs for a specific purpose – fair obtaining and processing;
- Keep that information secure;
- Ensure it is relevant and up to date;
- Only hold as much as the school needs and only for as long as it is needed; and
- Allow the subject of the information to see it on request.

Fair Obtaining and Processing

Hanson School undertakes to obtain and process data fairly and lawfully by informing all data subjects of the reasons for collection, the purposes for which the data are held, the likely recipients of the data and the data subjects' right of access.

Hanson School Data protection Policy

If details are given verbally, the person collecting the information will explain the issues before obtaining the information.

In terms of the act the following definitions are provided for clarity:

- “Processing” means obtaining, recording or holding the information or data or carrying out any, or a set of any, operations on the information or data.
- “Data subject” means an individual who is the subject of personal data or the person to whom the information relates.
- “Personal data” means data which relates to a living individual who can be identified.
- Addresses and telephone numbers are particularly vulnerable to abuse along with names and photographs, if published in the press or media or on the Internet.
- “Parent” has the meaning given in the Education Act 1996 and includes any person having parental responsibility or care of a child.

Registered Purposes

Registered purposes covering the data held at the school are listed in the school’s registration entry on the Information Commissioner’s Office website (see above). Information held for these stated purposes will not be used for any other purpose without the data subject’s consent.

Data Accuracy

Data held will be as accurate and up to date as is reasonably possible. If a data subject informs the school of a change of circumstances their associated computer record will be updated as soon as is practical.

If a data subject challenges the accuracy of their data the school will immediately mark the record as potentially inaccurate. In the case of any dispute, Hanson School will try to resolve the issue informally, but if this proves impossible, disputes will be referred to the Governing Body for their judgement. Until resolved, the record will remain marked as inaccurate and all disclosure of the affected information will contain both versions of the information.

Data Adequacy and Relevance

Data held about subjects will be adequate, relevant and not excessive in relation to the purpose(s) for which the data is being held. In order to ensure compliance with this principle, Hanson School will check records regularly for missing, irrelevant or seemingly excessive information and contact data subjects to verify certain items of data.

Length of Time

Data held about subjects will not be kept for longer than necessary for the purposes registered. It is the duty of the Director of Resources to ensure that obsolete data is properly erased or disposed of.

The School follows the Information and Records Management Toolkit for Schools (v4) for determining the length of time records are held for. A copy can be obtained from:

<http://www.irms.org.uk/resources/information-guides/199-rm-toolkit-for-school>.

Subject Access

The Data Protection Act extends to all data subjects a right of access to their own personal data. In order to ensure that people receive only information about themselves, it is essential a formal system of requests is in place. Where a request for subject access is received from a pupil the school's policy is that:

Requests from pupils will be processed as any subject access request, as outlined below, and the copy will be given directly to the pupil, unless it is clear the pupil does not understand the nature of the request. Requests from pupils who do not appear to understand the nature of the request will be referred to their parents. Requests from parents in respect of their own child will be processed as requests made on behalf of the data subject and the copy will be sent in a sealed envelope to the requesting parent.

Processing Subject Access Requests

Requests for access must be made in writing to the Director of Resources. Requests will be acknowledged and the planned date for supplying the information provided. Provided there is sufficient information to process the request this date will not normally be more than 40 school working days. Should more information be required, either to establish the identity of the data subject or the type of data requested, the date by which the information is to be provided will be adjusted to be no more than 40 school working days from the date sufficient information to process the request, has been provided to the school.

Note: In the case of any written request from a parent regarding their own child's record, access to the record will be provided with 15 school working days in accordance with the Education Pupil Information Regulations.

Authorised Disclosures

Only authorised and trained staff are allowed to make external disclosures of personal data and this must be reviewed by the Director of Resources before being disclosed. Data used within the school by administrative staff, teachers and welfare officers will only be made available where the person requesting the information is a professional legitimately working within the school and needs to know the information in order to do their work.

Hanson School Data protection Policy

The school will, in general, only disclose data about subjects with their consent. However, there are circumstances under which the school may need to disclose data without explicit consent for that occasion.

These circumstances are limited to:

- Pupil data disclosed to authorised recipients related to education and administration for the school to perform its statutory duties and obligations;
- Pupil data disclosed to authorised recipients in respect of their child's health, safety and welfare;
- Pupil data disclosed to parents in respect of their child's progress, achievements, attendance, attitude or general demeanour within school;
- Staff data disclosed to relevant authorities for example in respect of pension and administrative matters.

Data and Computer Security

Hanson School undertakes to ensure security of personal data is by a range of physical, logical and procedural security measures.

Physical Security

Appropriate building security measures are in place.

Logical Security

Personal information maintained on computer systems is protected by application level, share level and file level security permissions applied as necessary. For example, students cannot gain access under their own accounts to the school's MIS database server or application. Staff usernames and passwords are maintained and should be changed annually in line with the school's acceptable use policy.

Procedural Security

In order to be given access to data systems staff have to undergo checks and sign the Acceptable Use Policy. All staff are trained in their Data Protection obligations and their knowledge updated as necessary. Computer printouts as well as source documents are shredded prior to disposal. Any queries or concerns about security of data in the school should in the first instance be referred to the Director of Resources.

Individual members of staff can be personally liable in law under the terms of the Data Protection acts. They may also be subject to claims for damages from persons who believe that they have been harmed as a result of inaccuracy, unauthorised use or disclosure of their data. A deliberate breach of this Data Protection Policy will be treated as a disciplinary matter and serious breaches could lead to dismissal. Ratified by Governors – November 2014 Page 7

Appendix 1

SCHOOL PARTNERSHIP TRUST ACADEMIES

Nature of work - Academy

Description of processing

The following is a broad description of the way this organisation/data controller processes personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the organisation has provided or contact the organisation to ask about your personal circumstances.

Reasons/purposes for processing information

We process personal information to enable us to provide education, training, welfare and educational support services, to administer school property; maintaining our own accounts and records, undertake fundraising; support and manage our employees. We also use CCTV for security and the prevention and detection of crime.

Type/classes of information processed

We process information relevant to the above reasons/purposes. This may include:

- personal details
- family details
- lifestyle and social circumstances
- education and employment details
- financial details
- goods and services
- disciplinary and attendance records
- vetting checks
- visual images, personal appearance and behaviour

We also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs
- trade union membership
- sexual life
- information about offences and alleged offences

Who the information is processed about

We process personal information about:

- employees
- students and pupils
- professional experts and advisers
- members of school boards
- sponsors and supporters
- suppliers and service providers
- complainants, enquirers
- individuals captured by CCTV images

Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may

Hanson School Data protection Policy

need to share some of the personal information we process with for one or more reasons. Where necessary or required we share information with:

- family, associates and representatives of the person whose personal data we are processing
- educators and examining bodies
- careers service
- school boards
- local and central government
- academy trusts
- healthcare, social and welfare organisations
- police forces, courts
- current, past or prospective employers
- voluntary and charitable organisations
- business associates, professional advisers
- suppliers and service providers
- financial organisations
- press and the media

Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of the data protection act.

- family, lifestyle and social circumstances;
- financial details;
- education details;
- employment details;
- student and disciplinary records;
- vetting checks;
- goods and services;
- visual images, personal appearance and behaviour.

We also process sensitive classes of information that may include:

- physical or mental health details;
- racial or ethnic origin;
- religious or other beliefs of a similar nature;
- trade union membership;
- sexual life;
- offences and alleged offences.

Who the information is processed about

We process personal information about:

- our students;
- advisers and other professional experts;
- school staff;
- members of school boards;
- donors and potential donors;
- suppliers;
- complainants and enquirers;
- individuals captured by CCTV images.

Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process, with for one or more reasons.

Where necessary or required we share information with:

- education, training, careers and examining bodies;
- school staff and boards;
- family, associates and representatives of the person whose personal data we are processing;
- local and central government;
- healthcare professionals;
- social and welfare organisations;
- police forces;
- courts

Ratified by Governors – November 2014 Page 9

- current, past or prospective employers;
- voluntary and charitable organisations;
- business associates and other professional advisers;
- suppliers and service providers;
- financial organisations;
- security organisations;
- press and the media.

Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed, information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of the data protection act.

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Hanson School Data protection Policy

APPENDIX 1: POLICY CHANGES AND UPDATES

DATE	STAFF	CHANGES/UPDATES TO POLICY
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