

# Stanborough Primary and Nursery School Data Protection Policy



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## 1. Introduction

Stanborough Primary and Nursery School intends to fully comply with the Data Protection Act 1998 which regulates the processing of personal data whether held electronically or in manual form.

Processing includes obtaining, recording, holding, accessing, disclosing or using personal data. The Data Protection Officer of the school, being the data controller in terms of the Data Protection Act, has overall responsibility for ensuring that records are correctly processed. All staff within Stanborough Primary and Nursery School involved with such processing are aware of their duties and responsibilities in line with this policy.

Stanborough Primary School's Data Protection Policy will operate in conjunction with other policies including those for E-Safety, Records Management and the ICT Curriculum.

The Data Protection Officer for Stanborough Primary and Nursery School is:

**Mrs Angelika Horwood**

## 2. Data Processing

This school processes personal data in relation to students and parents or legal guardians for the following purposes:

Administration:

- Student and parent / legal guardian details are collected upon registration of a student to attend this school or upon admission of a student to this school. Such registration details are required to establish a student register for the administration of the intake of yearly students, and for the daily operations and efficient running of the school. Student records may also include photographs.
- The student details will incorporate the details of their parents / legal guardians to be contacted as necessary and to maintain a sound relationship with them, by involving them in the educational development of their child attending this school. Parents / legal guardians may also participate in school activities in the interest of their children. It is the responsibility of parents / legal guardians to provide the school with any amendments or changes to the registration details of our students to keep such information up to date.

Academic progress monitoring:

- This school is committed to provide the best education possible to its students. Performance data, including examination and / or assessment results are compiled and associated with student records, to monitor their progress during the scholastic years.

Organisation of school functions:

- The school organises activities from time to time to promote students' achievements, and give them exposure to certain field work to develop further their potential and abilities. The functions may form part of curricular requirements (such as end of year assembly, religious festivals, sports day, etc.) or may be of a non-curricular nature (such as outings, exhibitions, Christmas parties, etc.). In all functions, data of students and their parents / legal guardians may be processed for this purpose.

Historic records:

- Selective records processed for the above mentioned purposes (administration, academic and school functions) may be archived and kept for historic and record purposes.

#### Student welfare:

- The school may process records related to the welfare and social behaviour of the student concerned. Such information may include court orders regarding custody of minors, information compiled by child protection services including guidance and counselling, as well as any other information obtained from the student or parent / legal guardian, the police, and other support agencies. Such welfare data is processed in the best interest of the student concerned in order to provide him / her with the best possible protection and assistance, to improve his / her welfare, and further progress the development of the student involved.

#### Health:

- Medical examinations may be carried out by paramedics, in the case of an emergency, and psychologists / statementing board members in conjunction with the parent / legal guardian. Other health related information may also be provided by the parent / legal guardian themselves as a preventative measure.

#### Statistics and research:

- Personal data processed for statistical and research purposes are made anonymous. Where data is required for research related to students, consent is sought from the parent / legal guardian prior to its disclosure only when the research / statistics will not be rendered anonymous.

### **3. Data Storage**

- Personal data will be stored in a secure and safe manner;
- Electronic data will be protected by standard password and firewall systems operated by the school;
- Teachers may carry data on memory sticks or other removable data carriers in order to access their files both at home and at school. Any data carried in this way must be encrypted using appropriate encryption software, e.g. TrueCrypt;
- Computer workstations in administrative areas will be positioned so that they are not visible to casual observers waiting either in the office or at the reception hatch;
- Manual data will be stored where it is not accessible to anyone who does not have a legitimate reason to view or process that data;
- Particular attention will be paid to the need for security of sensitive personal data.

### **4. Data Checking**

- The school will issue regular reminders to staff and parents to ensure that personal data held is up-to-date and accurate;
- Any errors discovered would be rectified and, if the incorrect information has been disclosed to a third party, any recipients informed of the corrected data.

### **5. Data Disclosures**

Personal data will not be disclosed to other third parties without the consent of the parent / legal guardian, unless obliged by law and unless it is in the best interest of the child. Personal data will therefore be accessed and disclosed as follows:

#### Access:

- Restricted staff members of the school will access personal data on a need to know basis in the course of executing their duties. The professional staff requiring such data is fully aware of the obligations the school has under the Data Protection Act, and they will only use the data for the purposes for which it was collected.

Disclosure:

- Personal data will only be disclosed to organisations or individuals for whom consent has been given to receive the data, or organisations that have a legal right to receive the data without consent being given (e.g. examination boards, SATS registrations);
- When a request to disclose personal data is received by telephone we will 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;
- 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;
- If requests are received from parents or children for the names of other children in the class (e.g. for Christmas cards or birthday invites), only first names will be released.
- Personal data will not be used in newsletters, websites or other media without the consent of the data subject/Parents of the data subject;
- 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;
- Personal data will only be disclosed to Police Officers if they are able to supply a specific form which notifies of a specific, legitimate need to have access to specific personal data;
- 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 (e.g. Department for Children, Schools and Families).

## 6. Processing of Visual Images

Stanborough Primary School allows the taking of visual images in the form of photos, videos or other means, in its school activities. It is pertinent to point out that the school is only responsible for visual images taken by school representatives. Persons taking visual images for personal use during a school activity are held responsible for the use of such visual images.

Upon the admittance of students in this school, consent will be sought from parents / legal guardians where visual images are:

- a) taken by school representatives in non-curricular activities;
- b) used for communications purposes by publishing them on:
  1. printed matter including internal and external publications (e.g. school magazines, annual reports, newsletters, etc);
  2. school notice boards (except to process orders by students);
  3. media – including newspapers and TV;
  4. the internet (school and Education Division web sites);
- c) used for any other purpose other than administrative, school functions, historic and communications purposes. The consent given by parents / legal guardians may be withdrawn after informing the head teacher in writing. No visual image of the student in question will be taken after the consent has been withdrawn.

When a professional photographer is engaged by the school, the school shall ensure that the photographer understands data protection considerations and that he/she is able to satisfy all responsibilities and obligations in accordance with the Data Protection Act. This relationship will be regulated by a contract between the school and the photographer (see appendix). Visual images are retained for a period of three years except for those selected to be kept for historic records of the school.

## **7. Retention of Personal data**

The school does not hold any data longer than necessary, having considered the purposes for processing. In this regard, all personal data relating to students and their parents / legal guardian will be held for the period during which the student attended this school, with the exception of records selected to be kept for record purposes, and statistical data. Visual images not selected for historic record purposes will be kept for three years only.

Marks obtained by students in examinations are also kept for the duration of their attendance at this school, with the exception of results of the last scholastic year which are held for a period of five years only. It is therefore very important that all certificates, results and any other record indicating the educational progress of the student, is to be appropriately preserved by the parents / legal guardian for future use by the student.

## **8. Student and Parent / Legal Guardian Rights**

Students and parents / legal guardians are entitled to be provided with:

- a) actual information processed about them;
- b) a description from where this information has been collected;
- c) the purpose for processing such information;
- d) details about the recipients to whom data is disclosed;
- e) Knowledge of the logic involved in any automatic processing of data concerning them.

The request has to be made in writing duly signed by the parents / legal guardians and addressed to the Headteacher. Requests concerning students are to be made by their parents / legal guardian on behalf of the students.

The school aims to comply as quickly as possible with requests for access to personal information and will ensure that it is provided within a reasonable time, unless there is a good reason for delay. When a request for access cannot be met within a reasonable time, the reason will be explained in writing to the parent / legal guardian making the request.

In the event that personal data prove to be incorrect, the parent / legal guardian concerned may request to rectify, erase or not to use the information in question.

## **9. Enquiries**

All enquiries related to this school's Data Protection Policy are to be addressed as follows:

The Headteacher  
Stanborough Primary School  
Appletree Walk  
Garston  
Watford  
WD25 0DQ

## **10. Monitoring and review**

This policy has been reviewed and approved by the headteacher and governors. The Data Protection Policy will be reviewed and updated as necessary every two years.

**Compiled by:** Angelika Horwood (Data Protection Officer)

**Date: November 2010**

**Date for review: November 2012**