

# Huntspill Community Federation



## DATA PROTECTION POLICY



Lead Person: Derek Nevell  
Committee: Business  
Policy Date: Autumn 2017

### General Statement

The Governing Body of The Huntspill Federation has overall responsibility for ensuring that records are maintained, including security & access arrangements, in accordance with Education Regulations & all other statutory provisions.

The Headteacher & Governors of The Huntspill Federation intend to comply fully with the requirements & principles of the Data Protection Act 1984 & the Data Protection Act 1988. All staff involved with the collection, processing & disclosure of personal data are aware of their duties & responsibilities within these guidelines.

### Enquiries

Information about the school's Data Protection Policy is available from the headteacher. General information about the Data Protection Act can be obtained from the Data Protection Commissioner (Information Line 01625 545 745, website [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)).

### Fair Obtaining and Processing

The Huntspill Federation undertakes to obtain & process data fairly & lawfully by making clear the reasons for data collection, the purposes for which the data are held, the likely recipients of the data & the data subjects' right of access.

- **"processing"** means obtaining, recording or holding the information or data or carrying out any or set of 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 & telephone numbers are particularly vulnerable to abuse, but so can names & photographs be, if published in the press, Internet or media.
- **"parent"** has the meaning given in the Education act 1996, & includes any person having parental responsibility or care of a child.

## Data Integrity

The Huntspill Federation undertakes to ensure data integrity by the following methods:

- **Data Accuracy:** Data held will be as accurate & up to date as is reasonably possible. If a data subject informs the School of a change of circumstances their computer record will be updated as soon as is practicable. Where a data subject challenges the accuracy of their data, the School will immediately mark the record as potentially inaccurate, or 'challenged'. In the case of any dispute, we shall try to resolve the issue informally, but if this proves impossible, disputes will be referred to the Governing Body for their judgement. If the problem cannot be resolved at this stage, either side may seek independent arbitration. Until resolved the 'challenged' marker will remain & all disclosures of the affected information will contain both versions of the information.
- **Data Adequacy and Relevance:** Data held about people will be adequate, relevant & not excessive in relation to the purpose for which the data is being held. In order to ensure compliance with this principle, the School will check records regularly for missing, irrelevant or seemingly excessive information & may contact data subjects to verify certain items of data.
- **Length of Time:** Data held about individuals will not be kept for longer than necessary for the purposes registered.

## Subject Access

The Data Protection Acts extend 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 that 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 parents in respect of their own child will be processed & the copy will be sent in a sealed envelope to the requesting parent. Access to the record will be provided within 15 school days in accordance with the current Education (Pupil Information) Regulations.

## Authorised Disclosures

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

These circumstances are strictly limited to:

1. Pupil data disclosed to authorised recipients related to education & administration necessary for the school to perform its statutory duties & obligations.
2. Pupil data disclosed to authorised recipients in respect of their child's health, safety & welfare.
3. Pupil data disclosed to parents in respect of their child's progress, achievements, attendance, attitude or general demeanour within or in the vicinity of the school.
4. Staff data disclosed to relevant authorities eg in respect of payroll & administrative matters.

Only authorised staff are allowed to make external disclosures of personal data. Data used within the schools by administrative staff, teachers & welfare officers will only be made available where the person requesting the information is a professional legitimately working within the school who **needs to know** the information in order to do their work. The school will not disclose anything on pupils' records which would be likely to cause serious harm to their physical or mental health or that of anyone else - including anything which suggests that they are, or have been, either the subject of or at risk of child abuse.

### Security

The Huntspill Federation undertakes to ensure security of personal data by the following general methods:

1. Appropriate building security measures in place, such as alarms, window bars.
2. Computers are locked when the user is away from them.
3. Visitors to the school are required to sign in & out, to wear identification badges whilst in the school & are, where appropriate, accompanied.
4. Security software is installed on all computers containing personal data.
5. Only authorised users are allowed access to the computer files & password changes are regularly undertaken.
6. Computer files are backed up regularly.

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, & serious breaches could lead to dismissal.

October 2017