

Data Protection Policy

General Statement

The Headteacher and Governors of The Hamble School intend to comply fully with the requirements and principles of the Data Protection Act 1998. All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities within these guidelines.

Enquiries

Information about the school's Data Protection policy is available from the schools Senior Bursar or the Headteacher.

Fair Obtaining

The school undertakes to obtain and process personal data fairly and lawfully by informing all data subjects of the reasons for data collection, the purposes for which the data are held, the likely recipients of the data and the data subjects' rights of access. Information about the use of personal data is printed on the appropriate collection form; if details are given verbally the person collecting will explain the issues before obtaining the information.

Registered Purposes

The school is registered under the Data Protection Act for holding personal data. The school has a duty to protect this information and keep it up to date. The school is required to share information with the Local Authority and with the DfE.

Data Integrity

The school undertakes to ensure data integrity by the following methods:

Data Accuracy

Data held will be as accurate and as up to date as is reasonably possible. If a data subject informs the school of a change of circumstances their 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 (challenged). We shall try to resolve the issue informally but if this is not possible, any disputes will be referred to the Governors for their deliberation.

If the problem is not resolved at this stage independent arbitration may be sought by either side. Until resolved, the challenged marker will remain and all disclosures of the affected information will contain both versions of the information. In order to prevent such problem areas we shall provide data subjects with opportunities to check their data accuracy and request amendments.

Data Adequacy and Relevance

Data held about people will be adequate, relevant and not excessive to the purpose for holding the data. In order to ensure compliance with this

principle, the Administrative Staff will check records regularly for missing, irrelevant or seemingly excessive information and 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. It is the duty of the Administrative Staff, with appropriate guidance, to ensure obsolete data is properly erased.

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 that a formal system of requests is in place. Where a request for subject access is received in respect of a student, the school's policy is that:

- Requests from parents of their own child will, provided that the child does not understand the nature of subject access requests, be processed as requests made on behalf of the data subject (the child) and the copy will be sent in a sealed envelope to the requesting parent.
- Requests from students who do NOT understand the nature of the request will be referred to the child's parents

Processing Subject Access Requests

Parents/carers should ask for the Subject Access (appendix 2) form available from the School Office and staff should use the Staff Access Request (appendix 1) form available from the School Finance & Office Manager. Completed forms should be submitted to the School Finance & Office Manager.

Provided that there is sufficient information to process the request, an entry will be made in the Subject Access Folder, indicating the date of receipt, data subject's name, name and address of requester (if different), type of data required (e.g. Student Record, Personnel Record) and planned date of supplying the information (not more than 40 days from the request date).

Should more information be required to establish either the identity of the data subject (or agent) or the type of data requested, the date of entry in the log will be the date on which sufficient information has been provided.

Authorised Disclosures

In general, the school will only disclose data about individuals with their consent. However, there are circumstances under which the school's authorised officer(s) may wish to reveal data without express consent.

These circumstances are intentionally limited to:

- Student data disclosed to authorised recipients in respect of education and administration necessary for the school to perform its legitimate duties and obligations.
- Student data disclosed to authorised recipients in respect of their children's health, safety and welfare
- Student data disclosed to parents in respect of their children's progress, attendance, attitude and general demeanor within, and in the vicinity of, the school
- Staff data disclosed to the relevant authority in respect of payroll and schools' staff administration
- Other disclosures as may prove unavoidable, for example where an incidental disclosure occurs when an engineer is fixing the computer systems. In such cases, the engineer will sign a non-disclosure agreement. Education Authority IT Liaison/Support Officers are professionally bound not to disclose such data.

Only authorised and properly instructed staff are allowed to make external disclosures of personal data. Data used within the school by administrative staff, teachers and welfare workers must be made available only if the staff member **needs to know** the information for their work within the school.

Data and Computer Security

The school undertakes to ensure security of personal data by the following general methods – (for security reasons we cannot reveal precise details in this document):

Physical Security

Appropriate building security measures are in place, such as alarms, security access and lockable cabinets. Only authorised persons are allowed to log into computers, which are all password protected. All administrative computers are situated away from public access areas. Disks, memory sticks, printouts and files are locked away securely when not in use. Visitors to the school are required to sign in and out and are, where appropriate, accompanied.

Logical Security

Security software is installed on all computers containing personal data, only authorised users are allowed access to the computer files and password changes are regularly enforced. Computer files are backed up (i.e. security copies are taken) regularly. Filing cabinets should be kept locked when the

room is unattended. The office containing administrative computers is locked when unattended.

Procedural Security

In order to be given authorised access to the computer, staff will be properly checked and will sign a confidentiality agreement. All staff are trained and instructed in their Data Protection obligations and their knowledge updated as necessary. Computer printout and source documents are always shredded before disposal.

Overall security policy is determined by the Governing Body and will be monitored and reviewed as appropriate and whenever a major security breach or loophole is apparent. The school’s Security Policy is kept in a safe place at all times. Any queries or concerns about security of data within the school should be brought to the attention of the school Senior Bursar. Individual members of staff can be liable in law under the terms of this Act. They may also be subject to damages claims from persons harmed as a result of inaccuracy, unauthorised use or disclosure of their data. Any deliberate breach of this Data Protection policy will be treated as a disciplinary matter and serious breaches of the Act may lead to dismissal.

Further details on any aspect of this policy and its implementation can be obtained from the school Senior Bursar.

The Hamble School is committed to safeguarding and promoting the welfare of children.

Title of Policy	Data Protection Policy (THS)
Review Cycle	2 Years
Policy prepared by	Senior Bursar
Committee responsible	FP&SD
Statutory/Discretionary/School	Statutory
Date of latest FGB approval	20 June 2017
Date of last review by committee	20 June 2017
Date of next review by FGB	June 2019

Appendix 1

Data Protection Act 1998

Staff Request Form for Subject Access

To: School Senior Bursar, Governors of HCSC.

Please provide me with access to or supply me with a copy of personal data held on me by the school and Hampshire County Council. I have read and understood the instructions and conditions overleaf. Please forward this request to the relevant Chief Officers.

Signed(Employee) Date.....

Surname and Initials	Employee No.
Base Address	Home Address
Telephone Number	
E-Mail Address	
Description of the Information required (please also complete the tick boxes overleaf)	
Any Additional Details (such as relevant dates, contact names, references etc.)	

The above member of staff has requested Subject Access rights to personal data held in Hampshire County Council files under the Data Protection Act 1998. Please search your data files and forward to me details of the personal data requested by this employee, as defined within the Act.

Signed: Date:

(School Senior Bursar or Chair of Governors)

Appendix 1(cont)

Please tick the personal data you wish to have access to:

Type of Personal Data	Please tick ✓
Employment details -	
Specify -	
Personal details	
Health and medical records	
Financial records	
Pay records	
Pension records	
Absence record	
Training/development records	
Disciplinary records	
Trade union membership records	
Other (please specify)	

Appendix 2**Data Protection Act 1998****Request Form for Subject Access to School Files****Request for Access to Personal Data**

Under the Data Protection Act 1998, you have the right to enquire of any organisation whether they hold your personal /your child's personal data and to see a copy of that data. Individuals are called 'data subjects' in the Act.

If you require copies of data we may hold, please complete all sections below and return this form together with the necessary verification details. The information on the form will only be used to process your request and find information which relates to you/your child. It will be kept on file to respond to any subsequent correspondence, and will not be used for any other purpose. A response will be provided within 40 days of receipt of the completed form and proof of identity.

1. Details of Person Requesting Information

Full Name:

Date of Birth:

Address:

Tel. No.

E-Mail

Other Address Details (if less than 3 years at above address)

2. Are You the Data Subject?

YES: If you are the Data Subject please supply evidence of your identity – passport, driving licence or birth certificate (originals only) sent by special delivery unless you are able to bring them in person. Documents will be returned by special delivery. (Please go to question 7.)

NO: Are you the parent(s)/carer of the data subject? (Please complete questions 5 and 6)

3. Details of the Data Subject (if different to 1.)

Full name

Date of Birth

Address

Tel. No.

E-Mail

4. Please describe your relationship with the Data Subject that leads you to make this request for information.
5. Please describe the information you require:
6. Please add any additional details (such as relevant dates, contact names, references etc.)
7. Does the information requested include information relating to another person (a 3rd party)? YES/NO
8. Do you wish to view the information in person? YES/NO (information will otherwise be supplied in hard copy to the address supplied above)

SignedDate

Please note that it may be necessary to seek further information or proof of identity (of data subject or agent) before the request can be processed. If this is the case, then the statutory 40-day limit on response will commence from the date that the school receives all necessary information and proof. Every effort will be made to provide you with access or send you your details (along with an explanation of any codes or technical terms used) as soon as possible after receipt of your application.

If there is any part of this form you do not understand, or if you need further guidance, please contact the School Finance & Office Manager. Please return the completed form to the school. The following documents must accompany this application:

evidence of your identity;

evidence of the data subject's identity (if different from above).

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