

**Kildwick CE Primary School**  
*Learning to Live, Living to Love, Loving to Learn*

**Date Approved: Autumn 2021**

**Next Review: Spring 2022**

***Data Protection Policy***

***The Governing Body has overall responsibility for ensuring that:***

- personal information relating to pupils and staff is processed in accordance with Education Regulations and all other statutory provisions including the requirements of the Data Protection Act 1998 and subsequent legislation (GDPR 2018).
- all staff involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities

***Enquiries***

Any enquiry should be addressed to the Headteacher.

***Fair Obtaining and Processing***

**The School undertakes to process data fairly and for the following specified lawful purposes:**

- to comply with statutory duties and obligations related to education and administration
- to maintain/secure the pupil's health, safety and welfare and to provide appropriate pastoral care
- to provide parents/those with parental responsibility with information in relation to the pupil's progress, achievements, attendance, attitude, aptitude and/or general demeanour within or in the vicinity of the school
- in respect of administrative/financial matters
- to enable the school to provide references
- to assess how the School is performing

The parent or guardian of each pupil will be asked to give consent to the processing of personal information by signing and returning to the School a consent form which will then be retained on the pupil file. Data includes, but is not limited to:

- name, date of birth, postal address, email and telephone number(s)
- next of kin

- racial/ethnic origin
- religious belief or other belief of a similar nature
- physical or mental health or condition / any relevant medical information
- special educational needs
- the commission or alleged commission of any alleged disciplinary or criminal offence
- reports/evaluations
- exam results
- attendance information

### ***Data Accuracy***

Data held will be accurate and kept up to date insofar as is reasonably possible. If a data subject informs the School of a change of circumstances, his or her computer and manual record will be updated as soon as is reasonably practicable.

Where a data subject challenges the accuracy of their data, the School will as soon as is reasonably practicable mark the record as potentially inaccurate, or 'challenged'. In the case of any dispute, the Headteacher shall try to resolve the issue informally, but if this proves impossible, disputes will be dealt with through the School's Complaints Procedure for resolution. If the problem cannot be resolved at this stage, either side may seek independent arbitration via the Data Protection Information Commissioner.

Until resolved the 'challenged' marker will remain and all disclosures of the affected information will contain both versions of the information.

### ***Data Adequacy and Relevance***

Data held about individuals will be adequate, relevant and not excessive in relation to the purposes for which the data is being processed.

### ***Length of Time***

Save for contact details and references, data held about pupils will not be retained for longer than the pupil's 25th birthday, or later if required by the School's insurers and will then be destroyed in a confidential manner.

Data held about unsuccessful applicants for admission to the School or employment will be retained for no more than 12 months from the date of rejection.

### ***Subject Access***

Pupils and staff have a right of access to their own personal data (except where otherwise specified pursuant to legislation).

Requests for access by pupils, parents or staff must be made in writing to the Headteacher.

## **Disclosure to Third Parties**

Only authorised and trained staff are allowed to make external disclosures of personal data. External disclosure is envisaged in (but not limited to) the following circumstances:-

- to comply with statutory duties and obligations
- to maintain/secure the pupil/staff member's health, safety and welfare
- to provide parents/those with parental responsibility with information about the pupil's progress, achievements, attendance, attitude, aptitude and general demeanour within or in the vicinity of the School
- administrative/financial matters
- the provision of references. Copies of references will not be provided to the person who is the subject of the reference. The subject's specific consent will be sought before any reference is given
- exam results which may be disclosed to the media or education bodies for publication (either in grade order or alphabetically). Any pupils or parents objecting to such publication must say so in writing to the Headteacher.
- in the best interests of the School or pupil generally

Data used within the School by administrative staff, teachers, Senior management and Governors will only be made available to them where the person requesting the information is working within the School and needs to know the information in order to undertake their work. All staff will be made aware of this policy and their duties under the Data Protection Act.

## **Security of data**

The School undertakes to use its best endeavours to ensure the security of personal data by adopting appropriate organisational and technical measures.

### **Physical Security**

Appropriate building security measures are in place, such as alarms and a magnet locked doors. Visitors to the School are required to sign in and out, to wear identification badges whilst in the School and are, where appropriate, accompanied.

### **Systems Security**

Computer technology including ipads on school premises fall into two types: those for pupil use, those for staff use only

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Staff computers are protected in the following ways:

- Each requires password access. Passwords are restricted to staff who have access privileges to the information
- Passwords follow current best practice – e.g. they contain a mixture of numbers and letters, and are changed at least monthly
- Laptops / ipads are kept in locked cabinets when left on school premises out of school hours
- Data backups are kept weekly, as well as after significant data updates.
- Backed-up data is stored in a safe.
- School data is backed up to a secure website.

Only authorised users are allowed access to the computer files and password changes are regularly undertaken. Computer files are backed up regularly.