



Welbourne Primary Academy

DATA PROTECTION POLICY
**(incorporating Information Security Policy,
Information Commitment Statement,
and Fair Processing Notice)**

Headteacher	Mrs C. Everton	
Chair of Governors	Mrs J. Lowe	

Policy adopted by Governors: January 2017

Policy to be renewed: January 2019

1.1 Introduction

The Data Protection Act 1998 sets out what can and what cannot be done with personal data, that is information about living individuals, who can be identified from the information. This includes any expression of opinion about an individual and intentions towards an individual. It also applies to personal data held visually in photographs or video clips (including CCTV) or as sound recordings.

The Act protects personal privacy and upholds individual rights. Welbourne Primary School is placed under a legal obligation to comply with the provisions of this Act.

1.2 Commitment to the Protection of Personal Information

Welbourne Primary School needs to collect and use certain types of information about people with whom it deals in order to operate effectively. These include pupils, parents, guardians, staff, governors, suppliers and others with whom it communicates. In addition, it is required by law to collect and use certain types of information to comply with the requirements of the Local Authority (LA), government agencies and other bodies.

This Policy is intended to ensure that all personal information will be dealt with properly and securely and in accordance with the requirements of the Data Protection Act. This is regardless of what method is used for its collection, recording, storage or use – whether this is paper, a computer system or any other material.

This policy does not seek to convey the whole legislation to its readers, rather to acquaint them with the main provisions and to demonstrate that Welbourne Primary School has a commitment to those provisions. Further detailed information relating to data protection legislation can be obtained from the school office

Welbourne Primary School regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions and to maintaining confidence between those with whom we deal and ourselves. We ensure that our school treats personal information lawfully and fairly.

2. Our Data Protection Standards

Welbourne Primary School will, through appropriate management and adherence to agreed procedures as set out in the Data Protection Act - known as the Eight Data Protection Principles and constitute the rules for 'good information handling':

- 2.1. Personal Data will be collected and used fairly and lawfully.
- 2.2. Personal data will be obtained only for one or more specific and lawful purposes.
- 2.3. Personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which it is processed.
- 2.4. Personal data shall be accurate and where necessary kept up to date.
- 2.5. Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose. We will apply strict checks to determine the length of time information is held and ensure that it will be disposed of when no longer required, with due regard its sensitivity.
- 2.6. Personal data shall be processed in accordance with the rights of data subjects under the 1998 Data Protection Act. These include the right to be informed that processing is being undertaken, the right to access one's personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong.
- 2.7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful

processing of personal data and against accidental loss or destruction of, or damage to, personal data.

2.8. Personal data shall not be transferred to a country outside the EEA, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

3. Management Arrangements

Welbourne Primary School will ensure that:

3.1 The Headteacher is nominated to hold specific responsibility for data protection within the school.

3.2 Everyone managing and handling personal information understands that they are responsible for following good data protection practice

3.3. Everyone managing and handling personal information is appropriately trained to do so

3.3 Everyone managing and handling personal information is appropriately supervised

3.5. Anyone wanting to make enquiries about handling personal information knows what to do. The Fair Processing Notice is available to all parents, staff and governors on the school website

3.6 Queries about handling personal information are promptly and courteously dealt with

3.7 Every parent has the opportunity to opt out of photographs of their children being put in the public domain

3.8 Every parent has the opportunity to opt out of their child's image going on the website and accessing the internet in school

3.9 Methods of handling personal information are regularly assessed and evaluated

4. INFORMATION COMMITMENT STATEMENT

4.1 When we collect information

- we will only collect information that is necessary for what we do
- we will be fair in the way we collect information about you
- we will tell you who we are and what we intend to do with the information about you
- where practicable, we will collect information which relates to you directly from you
- if we collect information about you from someone else we will, wherever possible, make sure you know that we have done this

4.2 When we use and disclose information about you

- we will only use or disclose your information for legitimate purposes about which you have been told unless we are required to do otherwise for legal reasons

4.3 Information quality

- we will ensure that information about you is accurate and up to date when we collect or use it. To achieve this it is important that we are kept informed of any changes to the information we hold about you

4.4 Information security

- we will keep information about you secure
- we will protect your information against unauthorised use, damage, loss and theft

4.5 Retention

- we will hold information about you for as long as is necessary but, subject to any statutory retention periods, we will ensure that the information is disposed of in a secure and proper manner when it is no longer needed

4.6 Openness

- we will be open with you about what kinds of information we hold and what we do with it

4.7 Access and correction

- wherever possible, we will let you see the information we hold about you (should you wish) and correct it if it is wrong

4.8 In general:

- we will comply with the provisions of the Data Protection Act 1998 and any subsequent legislation relating to information handling and privacy. We will achieve this through the school's Information Security and Data Protection Policies supported by proper working practices and procedures.

If you need more a more detailed explanation of any of the commitments made in this statement, please contact the school's Administrator

FAIR PROCESSING NOTICE

Your Information - Our Commitment

Welbourne Primary School holds a great deal of information, much of which is confidential. This may be information about:

- *our pupils*
- *our pupil's parents or guardians*
- *our governors*
- *our teachers and other staff*

If we hold information about you, we wish to assure you that we are processing the information fairly and lawfully and that we will inform you of the purposes for which we require the information when you supply it to us.

WELBOURNE PRIMARY SCHOOL INFORMATION SECURITY POLICY

1. Introduction

The school's investment in the acquisition, storage and use of electronic and paper based information exists primarily to help provide the effective delivery of its services. This information is held about a variety of people and it is essential that the availability and confidentiality of accurate relevant information is maintained in a secure and legal environment.

The school is committed to achieving policy requirements through an Information Security process. To actively demonstrate this, the School has issued a Commitment Statement which provides assurance to pupils, parents, governors and staff that sound and secure measures are in place to protect the confidentiality, integrity and availability of their information.

2. Objective

The information security policy exists to ensure that the school's information base is protected against identified risks so that it may continue to deliver its services and obligations to the community. It also seeks to ensure that any security incidents have a minimal effect on its business and academic operations.

3. Policy

The purpose of this policy is to protect the school's information assets from all threats, whether internal or external, deliberate or accidental.

The key aims of the policy are to ensure that

- information is protected from unauthorised access
- confidentiality of personal or sensitive information is assured
- integrity of information is maintained
- information is disposed of in a timely, appropriate and secure manner
- legislative requirements and school policy and practices are observed
- business continuity plans are produced, maintained and tested
- information security training is available to all school staff
- appropriate monitoring and reporting processes are put in place to identify and act upon breaches of information security

4. Supporting framework

In order to achieve this, the school will develop and maintain information security standards. Procedures, working practices and protocols will be developed to support this policy. Examples of measures to achieve the above are physical security, virus control and the use of passwords for access control. The development of any new system will include information security analysis and requirements as part of the initial specification.

5. Responsibilities

The school's Head Teacher has direct responsibility for maintaining this policy and providing advice and guidance on its implementation. The Head Teacher will also have responsibility for ensuring that the **school's Management Team receives an annual report** on both the implementation and maintenance of the policy and its associated standards. All staff are responsible for policy implementation and for ensuring that staff they manage also adhere to the standards.

6. Implementation

This policy will be made available to all pupils, parents, guardians, staff (whether permanent or temporary) and governors.

7. Review

The school's Management Team will review this policy bi-annually and any changes necessary as a result of this review will be implemented without delay.

Signed

Chair

Headteacher