



# Victoria Road Primary School Data Protection Policy

<b>Policy written by</b>	<b>School</b>
<b>Reviewed &amp; Agreed</b>	<b>November 2023</b>
<b>Next Review</b>	<b>November 2024</b>
<b>Head teacher</b>	<b>Mrs Emma Roberts</b>
<b>Chair of Governors</b>	<b>Mrs Hilary Moss</b>

Signed: ..... Head Teacher

Signed: ..... Chair of Governors

## **Purpose:**

To ensure the school will comply with:

- The terms of the 1998 Data Protection Act, and any subsequent relevant legislation, to ensure personal data is treated in a manner that is fair and lawful.
- Information and guidance displayed on the Information Commissioner's website ([www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)).

## **Related Document:**

- This policy should be used in conjunction with the Halton Borough Council's extracts from Governonet Guide to the Law dated October 2010.

## **Implementation:**

### **Data Gathering**

- All personal data relating to staff, pupils or other people with whom the school has contact, whether held on computer, in paper files or other electronic media (CCTV), are covered by the Act.
- Only relevant personal data may be collected and the person from whom it is collected should be informed of the data's intended use and that it may be used for other purposes and may be disclosed subject to the school/Council complying with the Act.

### **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 and or Halton Borough Council.
- 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.
- All electronic data will be backed up on a daily basis with the backup disks retained in a secure off site environment.
- Manual data will be stored where it 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.

### **Data Checking**

- The school will issue regular reminders on a termly basis 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.

## **Disclosure and Use**

- When requests to disclose personal data are received by telephone it is the responsibility of the Headteacher to ensure so far as practicable that 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 so far as practicable that 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.
- Personal data will not be used in newsletters, websites or other media without the consent 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.
- A record will be kept of any personal data and CCTV footage disclosed so that the recipient can be informed if the data is later found to be inaccurate.
- Personal data should be encrypted (Password / PIN) if emailed to an external agency such as payroll information.

## **Subject Access Requests**

- If the school receives a written request from a data subject to see any or all personal data that the school holds about them this should be treated as a Subject Access Request and the school will respond within the 40 day deadline in accordance with the requirements of the 1998 Data Protection Act.
- Informal requests to view or have copies of personal data will be dealt with wherever possible at a mutually convenient time but, in the event of any disagreement over this, the person requesting the data will be instructed to make their application in writing and the school will comply with its duty to respond within the 40 day time limit.
- Requests for copies of CCTV footage can be requested at a cost of £10 per disk

## **Monitoring and Evaluation:**

- Headteacher will ensure information is regularly updated.
- Network Manager to monitor data issues and report it using the Incident Report Log

- Governors to receive a report of any Caldicott incidences at each termly meeting through the Headteachers report.