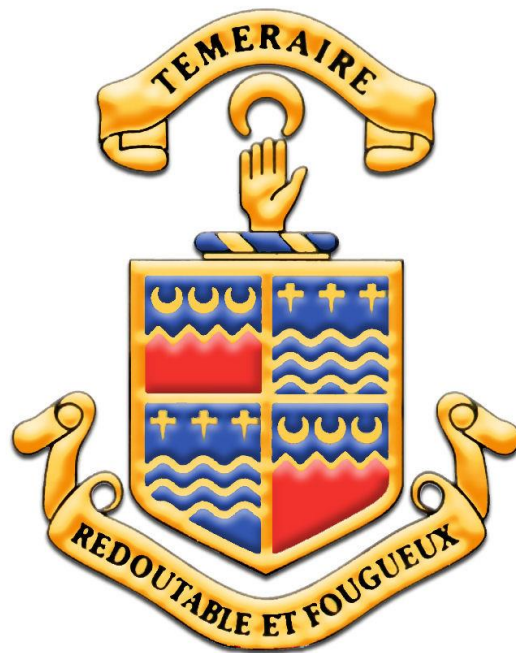


THE HARVEY GRAMMAR SCHOOL



Data Protection Policy

Adopted October 2016

Introduction

The Harvey Grammar School is committed to a policy of protecting the rights and privacy of all individuals, including students, staff and others, for whom it holds personal data in order to fulfill its role as an Academy.

This personal data includes information about current, past and prospective employees; pupils and their parents/carers; governors; and business contacts such as suppliers. All such data, whether held in manual or electronic filing systems or both, will be collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully in accordance with the requirements of the **Data Protection Act 1998**. It also applies to personal data held visually in photographs or video clips (including CCTV) or as sound recordings.

Principles

The School fully endorses the eight principles of the Data Protection Act, which can be summarised as requiring that personal data shall:

1. be processed fairly and lawfully and not be processed unless certain conditions are met;
2. be obtained for a specified and lawful purpose and not processed in any manner incompatible with that purpose;
3. be adequate, relevant and not excessive for those purposes;
4. be accurate and, where necessary, kept up to date;
5. not be kept for longer than is necessary for that purpose;
6. be processed in accordance with the data subject's rights;
7. be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using appropriate technical and organisational measures;
8. not be transferred to a country or territory outside the European Economic Area, 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.

Compliance

This policy applies to all staff and students of The Harvey Grammar School. Any breach of this policy, or of the Data Protection Act itself will be considered an offence and the school's disciplinary procedures will be invoked. As a matter of best practice, other agencies and individuals working with the school and who have access to personal information will be expected to read and comply with this policy.

Designated Data Controller

The Headteacher will be the school's Designated Data Controller i.e. the person who determines the purposes for which, and the manner in which, any personal data will be processed and who will be responsible for the implementation of this policy.

Rights of data subjects

Under the terms of the Data Protection Act, all individuals for whom the school holds personal data (**data subjects**) are entitled to:

- enquire about the information which the school holds about them and the purpose for which it is processed
- know how to gain access to their personal data
- be informed as to their responsibilities to ensure the data is kept up to date
- be informed of this policy and any revisions to it

Employees, pupils and other data subjects therefore have the right of access to any of their personal data which is stored on computer and to paper-based data held in certain manual filing systems. This right is subject to certain

exemptions which are set out in the Data Protection Act. Any person who wishes to exercise this right should make the request in writing to the Headteacher.

The school reserves the right to charge the maximum fee payable for each subject access request. If personal details are inaccurate, they will be amended upon request. The school aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt of a written request unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

Responsibilities

The Governing Body is responsible for checking that the school's registration with the Information Commissioners Office (ICO) is kept up to date.

The Headteacher is the school's Designated Data Controller and is responsible for monitoring adherence to this policy by all data subjects; developing and implementing procedures to ensure staff are aware of and comply fully with the policy; and renewing annually the school's registration with the ICO.

The Leadership Team will develop and encourage good practice in the handling of information within the school.

All staff employed at the school and any other person working in school with access to personal data are responsible for ensuring that any personal data they provide to the school is accurate and kept up to date; passing on to the school's administration team any changes to pupils' personal data which they may receive; and ensuring that any personal data which they hold on any data subject is kept securely and is not disclosed orally or in writing to any unauthorized third party.

Pupils and their parents are responsible for ensuring that any personal data they provide to the school is accurate and kept up to date.

All other agencies and individuals working with the school who have access to personal information (eg school counsellor) are expected to be aware of, and comply with, this policy at all times.