



**Campion School**

# **Data Protection Policy**

Dated: Sept 2016

Review: Sept 2019

**CAMPION SCHOOL**

**DATA PROTECTION  
POLICY**

**SEPTEMBER 2016**

Written:	September 2016
Review Date:	September 2019
Lead:	HR Officer
Via:	Resources Committee

## **Data Protection Policy**

### **Introduction**

Campion School recognises and accepts its responsibility as set out in the Data Protection Act 1998 and sub-legislation contained therein. The school, as a Data Controller, will take all reasonable steps to meet the responsibility and to promote good practice in the handling and use of personal information. In particular the School will comply with the Data Protection Principles set out in the 1998 Act.

Campion School recognises that by effectively managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

This policy applies to all School Governors and employees, and individuals about whom the school processes personal information, as well as other partners and companies with which the school undertakes its business.

### **Scope**

Campion School needs to collect and use certain types of personal information about people with whom it deals in order to operate. These include current, past and prospective employees, students, suppliers and others with whom it communicates.

In addition, the School may be required by law to collect and use certain types of information to comply with the requirements of government departments. This personal information must be dealt with correctly, however it is collected, recorded and used.

This policy applies to all records created, received or maintained by staff of Campion School in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created or received, and then stored, in hard copy or electronically.

### **Responsibilities**

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Head teacher.

The person responsible for records management in the school will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's record management guidelines.

All the records and information is stored by Champion School is confidential. Individual staff and employees who access records and/or information must ensure they adhere to this confidentiality. The Head teacher and the Head teacher's PA / HR Officer are first line access users in the context of confidential information.

This policy has been drawn up within the context of:-

- Freedom of Information Act 2000
- Data Protection Act 1998
- And with other legislation or regulations (including audit, equal opportunities and ethics) affecting the School

### **Managing Student Records**

Champion School holds a student record for every student on roll; all information relating to the student will be found in the file.

A student or their nominated representative have the legal right to see their file at any point during their education and even until the record is destroyed. This is their right of subject access under the Data Protection Act 1998. All information recorded in the student file will be accurately recorded, objective in nature and expressed in a professional manner. Items which should be kept on the student record include:-

- Admission form
- Fair processing notice
- Parental permission for photographs to be taken (or not)
- Years Record
- Annual Written Reports to Parents
- National Curriculum and R.E. Agreed Syllabus Record Sheets
- Any information relating to a major incident involving the student
- Any reports written about the student
- Any information about a statement and support offered in relation to the statement
- Any relevant medical information
- Child Protection reports / disclosures
- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil

All student records are kept securely at all times. Paper records are kept in lockable storage drawers in the General Office.

As the school which the student attends until statutory school leaving age, Champion School is responsible for retaining the student record until the student reaches the age of 25 years. This retention is set in line with the Limitation Act 1980 which allows that a claim can be made against an organisation by a minor for up to seven years from their 18<sup>th</sup> birthday.

Student Records are disposed of securely through confidential waste collection coordinated by the Office Manager, once they have reached their minimum retention schedule.

### **Biometric Information**

In December 2012, the Department for Education issued new rules for schools regarding the electronic storage of 'Biometric Information of Children in Schools' and how this related to the Data Protection Act 1998.

The new change in the legislation requires school to notify parents of the school's intention to use automated biometric recognition systems and to gain written permission from the parents to do so in relation to their child. (An automated biometric recognition system uses technological equipment to help identify an individual from a fingerprint or retinal scan).

At Champion School we currently use students' biometric data in the refectory to serve pupils food speedily through fingerprint recognition software that instantly provide the details of a student's name and tutor group.

The law requires that we only use your child's biometric information for such educational administrative purposes, that the data is securely stored, that it is not disclosed to any other organisation and that it is deleted when your child leaves the school.

In order to comply with the new DfE regulations, Champion School issue a letter to all new parents asking for written consent to use automated biometric recognition systems in relation to their child.

### **Managing Personnel Records**

Champion School holds a personnel record for every current employee; all information relating to the employee will be found in the file.

An employee or their nominated representative have the legal right to see their file at any point during their employment and even until the record is destroyed. This is their right of subject access under the Data Protection Act 1998. All information recorded in the personnel file will be accurately recorded, objective in nature and expressed in a professional manner. Items which should be kept on the personnel record include:-

- Interview notes and recruitment records
- Pre-employment safeguarding information including DBS Checks
- Proofs of identity collected as part of the enhanced DBS Check
- Copies of relevant training and qualifications
- Copies of correspondence pertaining to the individual
- Copies of contracts / job descriptions held by the employee
- Disciplinary proceedings
- Records relating to accident / injury at work
- Annual appraisal / assessment records
- Salary statements
- Maternity / paternity records
- Absence / Sickness certificates

All personnel records are kept securely at all times. Paper records are kept in lockable storage cabinets in the Office of the HR Officer / Head teacher's PA.

Campion School is responsible for retaining personnel records for a period of seven years from the date of the termination of the contract.

Personnel Records are disposed of securely through confidential waste collection coordinated by the Office Manager, once they have reached their minimum retention schedule.

### **Data Protection and Social Networking**

Campion School operate a Social Networking Policy which identifies the ways that employees should protect themselves against allegation or exposure of personal information.

### **ICT Security**

Campion School operates one secure computer network: - combined curriculum and administration. The network is password protected and safeguarded by Vipre; an anti-viral system which is managed internally.

The School runs a firewall to prevent any unwanted threats accessing the computer network externally. The School's proxy server filters internal internet access for staff and students; protecting the network from any potentially harmful websites.

The School's Wi-Fi network is password protected to prevent use by any external parties.

The School's network is backed up nightly in two different locations. This ensures the system can still run and information is retained in the event that one part of the system fails.

Employees of Campion School are provided with a unique set of credentials to allow them access to the Schools' secure computer network; curriculum and administration. Personal documents are stored on the internal network and can only be accessed by the employee through their username and password. Information stored on the network is backed up nightly.

Employees of Campion School can access their email account externally through the School's website. Email accounts are protected through a staff login and password; accounts accessed through external computer networks will automatically be logged out after a period of inactivity to offer further security measures. Once an employee leaves the organisation, their email account and log in/password is deactivated so they will no longer be able to access the School network.

Staff personnel electronic records are stored securely on the School's internal server, on the SIMS database. Staff records can only be accessed by the HR Officer who has a unique log in and password. The SIMS data is encrypted so that an additional decryption tool and password would need to be entered to extract information. SIMS is not accessible outside of the School.

Student personnel electronic records are stored securely on the School's internal server on the SIMS database. Student records can be accessed by staff who have a unique log in and password. The SIMS data is encrypted so that an additional decryption tool and password would need to be entered to extract information. SIMS is not accessible outside of the School.

Financial data is stored securely on the School's internal server on the SIMS Financial Management System (FMS). Financial information is only accessible by the Principal

Finance Officer and the finance assistants who have unique log in and passwords. The FMS data is encrypted so that an additional decryption tool and password would need to be entered to extract information. FMS is not accessible outside of the School.

Students of Campion School have a unique set of credentials to allow access to the School's curriculum network. Students cannot access the administration network. Students' credentials allow access to the Virtual Learning Environment which can also be accessed outside of the School through external servers, but only by way of a log in and password.