



## Data Protection Policy

<b>This policy will be reviewed annually</b>
Policy reviewed: by SMT
Next review: by SMT September 2018

### Introduction

The School holds and processes information about employees, pupils, parents and other data subjects for academic and administrative purposes. When handling such information, the School, and all staff or others who process or use any personal information, must comply with the Data Protection Principles which are set out in the Data Protection Act 1998 (the Act). In summary these state that personal data shall:

Be processed fairly and lawfully

Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose

Be adequate, relevant and not excessive for the purpose

Be accurate and up-to-date

Not be kept for longer than necessary for the purpose

Be processed in accordance with the data subject's rights

Be kept safe from unauthorised processing, and accidental loss, damage or destruction

Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

### DEFINITIONS

“Staff”, “pupils”, “parents” and “other data subjects” may include past, present or potential members of those groups.

“Other data subjects” and “third parties” may include contractors, suppliers, contacts, referees, friends or family members.

“Processing” refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

#### Notification of Data Held

The School shall notify all staff, pupils, parents and other relevant data subjects of the types of data held and processed by the School concerning them, and the reasons for which it is processed. The information which is currently held by the School and the purposes for which it is processed are set out in the [Appendix 1](#) to this Policy. When processing for a new or different purpose is introduced the individuals affected by that change will be informed and the Appendix 1 will be amended.

#### Staff Responsibilities

All staff shall:

*WCPS is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all pupils fulfil their potential.*

Ensure that all personal information which they provide to the School in connection with their employment is accurate and up-to-date;  
Inform the School of any changes to information, for example, changes of address;  
Check the information which the School shall make available from time to time, in written or automated form, and inform the School of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. The School shall not be held responsible for errors of which it has not been informed.

When staff hold or process information about pupils, parents, colleagues or other data subjects (e.g.: pupils' assignment, pastoral files, references to other academic institutions, or details of personal circumstances), they should comply with the Data Protection Guidelines for Staff .

Staff shall ensure that:

All personal information is kept securely

Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases

Electronic data kept off site is encrypted.

When staff supervise pupils doing work which involves the processing of personal information, they must ensure that those pupils are aware of the Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

**Pupil and Parent Responsibilities**

All pupils and parents shall:

Ensure that all personal information which they provide to the School is accurate and up-to-date

Inform the School of any changes to that information, for example, changes of address

Check the information which the School shall make available from time to time, in written or automated form, and inform the School of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. The School shall not be held responsible for errors of which it has not been informed.

Pupils who use the School computer facilities may, from time to time, process personal information (for example, in assignment or research). In those circumstances, they must notify a designated data controller (see section 7), who will provide further information about this requirement.

**Rights to Access Information**

Staff, pupils, parents and other data subjects in the School have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files.

Any person may exercise this right by submitting a request in writing to a designated data controller.

The School will make a charge for each official Subject Access Request under the Act.

The School aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the data controller to the data subject making the request.

**Subject Consent**

In some cases, such as the handling of sensitive information or the processing of research data, the School is entitled to process personal data only with the consent of the individual. Agreement *WCPS is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all pupils fulfil their potential.*

to the School processing some specified classes of personal data is a condition of acceptance of a pupil on to any class, and a condition of employment for staff (See Appendix 1).

### Sensitive Information

The School may process sensitive information about a person's health, disabilities, criminal convictions, race or ethnic origin, or trade union membership. For example, some jobs or classes will bring the applicants into contact with children, including young people between the ages of 16 and 18, and the School has a duty under the Children Act 1989 and other enactments to ensure that staff are suitable for the job, and pupils for the classes offered. The School may also require such information for the administration of the sick pay policy, the absence policy or the equal opportunities policy, or for academic assessment.

The School also asks for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma or diabetes. The School will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency.

### Retention of Data

The School will keep different types of information for differing lengths of time, depending on legal, academic and operational requirements. A list of recommended retention times is set out in the Personal Information Disposal and Retention Guidelines.

### Compliance

Compliance with the Act is the responsibility of all pupils and members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the school secretary or by e-mail at [info@wimbledoncommonprep.co.uk](mailto:info@wimbledoncommonprep.co.uk).

Any individual, who considers that the policy has not been followed in respect of personal data about him- or herself, should raise the matter with the designated data controller initially. If the matter is not resolved it should be referred to the staff grievance or pupil complaints procedure.

## **Appendix 1: School information processing**

The School has notified the Information Commissioner that personal information may need to be processed for the following purposes:

- Staff, Agent and Contractor Administration
- Advertising, Marketing, Public Relations, General Advice Services
- Accounts & Records
- Education
- Pupil and Staff Support Services
- Research
- Other Commercial Services
- Publication of the School Magazine
- Crime Prevention and Prosecution of Offenders
- Alumni Relations & Fundraising

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Complete details of the School's current entry on the Data Protection Register can be found on the notification section of the [Information Commissioner's web site](#). Select the option to **search register** and when the search form is displayed type King's College School into the Name box and then click on **search**

The register entry provides:

- a fuller explanation of the purposes for which personal information may be used
- details of the types of data subjects about whom personal information may be held
- details of the types of personal information that may be processed
- details of the individuals and organisations that may be recipients of personal information collected by the School
- information about transfers of personal information.