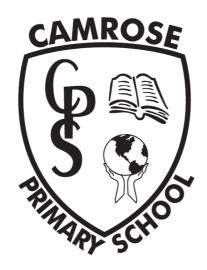
# Camrose Primary School with Nursery



<u>Article 3</u>: All organisations which are involved with children should do what is best for the child.

Article 19: All children should be protected from violence, abuse and neglect.

# **Data Protection Policy**

**Status: Statutory** 

Policy written by: S Crick

Date up-dated: Spring 2020

Date shared with Staff: Spring Term 2020

Date to be reviewed: Autumn 2023

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# **Data Protection Policy**

#### 1. Aims

Our school aims to ensure that all data collected about staff, pupils, parents and visitors is collected, stored and processed in accordance with the Data Protection Act 1998.

The school aims to have transparent systems for holding and processing personal data. Any reference to personal data in this policy includes reference to sensitive personal data. Processing may include obtaining, recording, holding, disclosing, destroying or otherwise using data.

This policy applies to all data, regardless of whether it is in paper or electronic format.

## 2. Legislation and Guidance

This policy meets the requirements of the <u>Data Protection Act 1998</u>, and is based on <u>guidance published by the Information Commissioner's Office</u> and <u>model privacy notices published by the Department for Education</u>.

It also takes into account the expected provisions of the <u>General Data Protection Regulation</u>, which is new legislation due to come into force in 2018.

In addition, this policy complies with regulation 5 of the <u>Education (Pupil Information) (England) Regulations</u> 2005, which gives parents the right of access to their child's educational record.

#### 3. Data Protection Principles

The Data Protection Act 1998 is based on the following data protection principles, or rules for good data handling:

Data shall be processed fairly and lawfully

Personal data shall be obtained only for one or more specified and lawful purposes

Personal data shall be relevant and not excessive in relation to the purpose(s) for which it is processed

Personal data shall be accurate and, where necessary, kept up to date

Personal data shall not be kept for longer than is necessary for the purpose(s) for which it is processed

Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998

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

Personal data shall not be transferred to a country or territory outside the European Economic Area unless the country or territory ensures an adequate level of protection for the rights and freedoms of data in relation to the processing of personal data

#### 4. The Data Controller

Our school processes personal information relating to pupils, staff and visitors, and, therefore, is a data controller. There are three delegated Controllers; they are: the Headteacher, the Designated Data Protection Officer and the Data Protect Coordinator.

The school is registered as a data controller with the Information Commissioner's Office and renews this registration annually.

# 5. Roles and Responsibilities

The governing board has overall responsibility for ensuring that the school complies with its obligations under the Data Protection Act 1998.

Day-to-day responsibilities rest with the headteacher, or the Bursar in the headteacher's absence. The headteacher will ensure that all staff are aware of their data protection obligations, and oversee any queries related to the storing or processing of personal data.

Staff are responsible for ensuring that they collect and store any personal data in accordance with this policy. Staff must also inform the school of any changes to their personal data, such as a change of address.

(See appendix A)

## 6. Processing Personal Data

Processing of personal data includes obtaining, holding, recording, adding, deleting, augmenting, disclosing, destroying, printing or otherwise using data. Processing also includes transferring data to 3rd parties. (See Appendix D: Definitions)

Consent may be required for the processing of personal data unless the processing is necessary for the school to undertake their obligations to pupils and their parents or guardians. Personal data, unless otherwise exempt from restrictions on processing under the DPA, will only be disclosed to third parties under the terms of this policy or otherwise with the consent of the appropriate individual.

The rights in relation to personal data set out under the DPA are those of the individual to whom the data relates. The school will, in most cases, rely on parental or guardian consent to process data relating to pupils, and those with 'parental responsibility' are entitled to receive relevant information concerning the child.

A pupil of sufficient maturity (aged 12 years and above) and understanding has certain legal rights which the school must observe. These include the right to give or withhold consent and certain rights to confidentiality. In exceptional circumstances, if a conflict of interest arises between a parent and a pupil, the rights of, and duties owed to the Pupil will in most cases take precedence over those of the parent.

#### Exemptions which allow disclosure of personal data to third parties

There are a number of exemptions in the DPA which allow disclosure of personal data to third parties, and the processing of personal data by the school and its employees, which would otherwise be prohibited under the DPA. The majority of these exemptions only allow disclosure and processing of personal data where specific conditions are met, namely:

- a) The data subjects have given their consent;
- b) To safeguard national security;
- c) For the prevention or detection of crime;
- d) To prevent serious harm to the data subject or a third party;
- e) For the assessment of any tax or duty;
- f) Where it is necessary to exercise a right or obligation conferred or imposed by law upon the school (other than an obligation imposed by contract);
- g) For the purpose of, or in connection with, legal proceedings (including prospective legal proceedings);
- h) For the purpose of obtaining legal advice;

# 7. Use of Personal Data by the School

#### **Pupils and parents**

We hold personal data about pupils to support teaching and learning, to provide pastoral care and to assess how the school is performing. We may also receive data about pupils from other organisations including, but not limited to, other schools, local authorities and the Department for Education.

This data includes, but is not restricted to:

Contact details

Results of internal assessment and externally set tests / assessments

Data on pupil characteristics, such as ethnic group or special educational needs

**Exclusion information** 

Behaviour, both positive and negative

Details of any medical conditions

**Photographs** 

In particular, the school may:

- a) Make available information to any internal association, society or club set up for the purpose of maintaining contact with pupils or for administration, fundraising, marketing or promotional purposes relating to the school. The school will remain as data controller and this policy will govern data usage.
- b) Make use of photographs of pupils in school publications and on the school website as set out in the parent contract.
- c) Make personal data, including sensitive personal data, available to staff for planning curricular or extracurricular activities.

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about pupils with anyone without consent unless the law and our policies allow us to do so. Individuals who wish to receive a copy of the information that we hold about them/their child should refer to sections 8 and 9 of this policy.

We are required, by law, to pass certain information about pupils to specified external bodies, such as our local authority and the Department for Education, so that they are able to meet their statutory obligations.

## 8. Disclosure of personal data to third parties

The school may receive requests from third parties (i.e. those other than the data subject, the school, and employees of the school) to disclose personal data it holds about pupils, their parents or guardians. This information will not generally be disclosed unless one of the specific exemptions under the DPA which allow disclosure applies; or where necessary for the legitimate interests of the individual concerned or the school.

The following are the most usual reasons that the school may have for passing personal data to third parties. To:

- a) Give a confidential reference relating to a pupil;
- b) Publish the results of public examinations or other achievements of pupils of the school;
- d) Disclose details of a pupil's medical condition where it is in the pupil's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
- e) Provide information to another educational establishment to which a pupil is transferring;
- f) Provide the relevant information to the Government Department e.g. DfES, Ofsted, concerned with national education.

The Department for Education uses information about pupils for statistical purposes, to evaluate and develop education policy and to monitor the performance of the nation's education service as a whole.

The statistics are used in such a way that individual pupils cannot be identified from them. Any wish to limit or object to any use of personal data by third parties, except as stated above, should be notified to the Data Protection Coordinator of the relevant school in writing.

Where the school receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure. When members of staff receive enquiries from third parties for personal data, the enquirer should be asked why the information is required. If consent to the disclosure has not been given (and an exception does not apply) then the request should be declined.

In normal circumstances information should not be disclosed over the phone to third parties. In most circumstances third parties should be asked to provide documentary evidence to support data requests.

# 9. Images used by the school

Photographs with names identifying pupils will not be published on the school website, etc. without the express permission of the appropriate individual. This permission is gained through the completion and signature of the photography consent form.

Parents who do not want their child's photograph or image to appear in any of the school's promotional material, or be otherwise published, must also make sure their child knows this.

Pupils, parents and guardians should be aware that where photographs or other image recordings are taken by family members or friends for personal use, the DPA will not apply, e.g. where a parent takes a photograph of their child and some friends taking part in the school sports day.

Parents or family members should seek permission to record events.

Occasionally we may take photographs of the children at school. We use these images as part of our school displays and sometimes in other printed publications like the Early Years Learning Journeys and school sports updates. We will also use some on our school website.

To comply with data protection laws we need parents' permission before we can photograph or make any recording of their children.

All parents are required to have completed a consent form and completed forms are kept centrally in the school office for reference.

If a parent wishes to change their level of consent they should complete a new form and return it the school office to inform the school of the change.

(See Appendix H: Photo consent form)

#### 10. Staff

We process data relating to those we employ to work at, or otherwise engage to work at, our school. The purpose of processing this data is to assist in the running of the school, including to:

- Enable individuals to be paid
- Facilitate safe recruitment
- Support the effective performance management of staff
- Improve the management of workforce data across the sector
- Inform our recruitment and retention policies
- Allow better financial modeling and planning
- Enable ethnicity and disability monitoring
- Support the work of the School Teachers' Review Body

Staff personal data includes, but is not limited to, information such as:

- Contact details
- National Insurance numbers
- Salary information
- Qualifications
- Absence data
- Personal characteristics, including ethnic groups
- Medical information
- Outcomes of any disciplinary procedures

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about staff with third parties without consent unless the law allows us to.

We are required, by law, to pass certain information about staff to specified external bodies, such as our local authority and the Department for Education, so that they are able to meet their statutory obligations.

Any staff member wishing to see a copy of information about them that the school holds should contact The Bursar: Mrs C Aston.

# 11. Accuracy of Personal Data

The school will endeavour to ensure that all personal data held in relation to an individual is accurate. Individuals must notify the relevant school's Data Protection Coordinator in writing of any changes to information held about them. An individual has the right to request that inaccurate information about them is erased or corrected.

Schools will issue a Data Collection Sheet (Appendix B) to all parents/guardians on an annual basis to help with data accuracy.

## 12. Security of Personal Data

The school will take all reasonable steps to ensure that all personal information is held securely and is not accessible to unauthorised persons. Personal information will, so far as possible, be:

- · Kept in a locked filing cabinet; or
- In a locked drawer: or
- If computerised, be password protected; or
- Kept only on disk which is itself kept securely.

All staff should be aware of the Acceptable Use Policy which is separate to this document.

# 13. Subject Access Requests

Under the Data Protection Act 1998, pupils have a right to request access to information the school holds about them. This is known as a subject access request.

Subject access requests must be submitted in writing, either by letter or email. Requests should include:

The pupil's name

A correspondence address

A contact number and email address

Details about the information requested

Charges may apply: (See Appendix E: Charges)

The school will not reveal the following information in response to subject access requests:

- Information that might cause serious harm to the physical or mental health of the pupil or another individual
- Information that would reveal that the child is at risk of abuse, where disclosure of that information would not be in the child's best interests
- Information contained in adoption and parental order records
- Certain information given to a court in proceedings concerning the child

# 14. Responding to Requests for Access to Records

The school will send a written response to the applicant acknowledging receipt of the application form. This must be done within 5 days of the request being received. (See Appendix F: SAR release Letter)

The school's Data Protection co-ordinator (PDC) will manage the response to the applicant. The Data Protection co-ordinator will also maintain a SAR process sheet (Appendix C). The purpose of the process sheet is to identify and monitor deadlines and record contact with and information sent to the applicant. It will also record decisions taken with regard to the application.

The Headteacher must authorise the applicant's request for access before any information is disclosed.

The school may also wish to get advice from the Solicitor in relation to a disclosure.

If the applicant's request for access is granted, the DPC requires such access to be given within 40 days of the written request being received. The 40 day period does not begin until:

- a) A written application is received by the Data Protection Officer.
- b) The school has received sufficient information to enable it to identify the individual who is seeking access;
- c) The school has received sufficient information to enable it to access the information requested; and
- d) The fee of £10 has been received.

In order to meet the 40 day requirement the following schedule will be enforced:

- School DP co-ordinator to collate the data requested and forward the SAR process sheet outlining
  the information collected and actions taken to the Headteacher for overview. This must be done
  within 15 days of the request being received by the school.
- The DPO has 10 days from this point to liaise with the DP co-ordinator at the school and agree the information to be sent (or withheld) to the applicant.
- The applicant should receive the data once the 25 days are complete or sooner if possible. This 25 day timescale allows for further discussion and clarification to take place with the applicant if necessary, within the 40 day limit.
- The school should agree a secure method of releasing the records to the applicant.

Where the conditions set out above are fulfilled, in responding to the request, the school must give a description of the personal data that is being processed, the purposes for which the personal data is being processed, and the persons to whom the personal data are or may be disclosed.

The school must also provide, in an intelligible form, a copy of the information held and, where possible, details of the source of the information.

Data subjects are not entitled to information where exemptions to the right of access apply (see below). Moreover, in these circumstances, the school must only give a notification to the data subject that no information has been identified which is required to be supplied under the DPA.

# 15. Exemptions to Access by Data Subjects

Confidential references given, or to be given by the schools, are exempt from access. The schools will therefore treat as exempt any reference given by them for the purpose of the education, training or employment, or prospective education, training or employment of any pupil or member of staff.

It should be noted that confidential references received from other parties may also be exempt from disclosure. However, such a reference can be disclosed if such disclosure will not identify the source of the reference or where, notwithstanding this, the referee has given their consent, or where disclosure is reasonable in all the circumstances.

An exemption may also be considered in cases where a third party is identified and disclosure may be detrimental to that party

Data covered by Legal Privilege is also exempt i.e. where it may be necessary to take legal advice regarding a Data Subject; this information is exempt from Subject Access Request.

## 16. Parental Requests to see Educational Records

Parents have the right of access to their child's educational record, free of charge, within 15 school days of a request.

Personal data about a child belongs to that child, and not the child's parents. This is the case even where a child is too young to understand the implications of subject access rights.

For a parent to make a subject access request, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

The Information Commissioner's Office, the organisation that upholds information rights, generally regards children aged 12 and above as mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents of pupils at our school may be granted without the express permission of the pupil.

#### 17. Collection of Data

All forms used by the school to collect personal data about a pupil will carry a standard Data Protection notice: as follows:

'I/We consent to the school (through the head as the person responsible) obtaining, using, holding and disclosing "Personal data" including "sensitive personal data" (such as medical information), for the purposes of safeguarding and promoting the welfare of our child, and where necessary, for the legitimate interests of the School and ensuring that all relevant legal obligations of the school and ourselves are complied with.

I/ We give my/our consent to such processing and disclosure provided that at all times any processing or disclosure of personal data or sensitive personal data is done lawfully and fairly in accordance with the Data Protection Act 1998.'

#### 18. Storage of Records

Paper-based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept under lock and key when not in use

Papers containing confidential personal information should not be left on office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access

Where personal information needs to be taken off site (in paper or electronic form), staff must sign it in and out from the school office

Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals

Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices

Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures for school-owned equipment

#### 19. Retention of data

The school will not keep pupil and related data for longer than necessary. To this end records of Primary school pupils will be transferred securely to the next school. Any records or part of records retained will be disposed of 7 years after the pupil finishes their education at the school.

A Disposal Log (Appendix J1) will be maintained to list which records have been deleted, the date and description.

Personal details of pupil applicants which did "not progress" will be disposed of after 2 years.

Staff records will be securely disposed of 7 years after a member of staff leaves the employment of the school. Brief details will be retained on all staff indefinitely to satisfy future reference requests. These details

will include full name, date of birth, job title, national insurance number and period of employment. Exceptions to this include records where there may be ongoing litigation in which case the entire record will be retained until final disposition of the matter and thereafter for a period of 7 years.

Unsuccessful staff applications should be kept for 6 months after interview.

Accident books / logs relating to all accidents in school should be kept for 40 years after the accident has been recorded as a claim could be made up to that time. The accident book must meet HSE accident book requirements.

An Accident: is any unplanned or undesired event that results in injury to a person which requires significant first aid intervention.

A flagging process should also be maintained to identify those records which should not be deleted due to litigation or other reasons. The flagging process and accident log should be referred to prior to records being deleted to identify any exceptions.

#### 20. Disposal of records

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely.

For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic records.

(See Appendix G: Disposal Log)

#### 21. CCTV Code of Practice

The Data Protection Act 1998 introduced a systematic legal control of CCTV surveillance through the publication of a Code of Practice that came into effect in March 2000. It was updated in July 2000 and again in October 2001.

Since that time it has become a criminal offence to use an un-notified, non-domestic CCTV system to observe or record people in a public or a private place. It is the responsibility of the Data Protection Officer to include CCTV in the schools DP Notification.

The school must ensure that systems in their school have signs that make the public aware that they are entering a zone which is covered by surveillance equipment.

In addition it is the responsibility of the Data Protection Officer in the school to ensure that procedures are agreed with Kier and in place with regard to day to day operation of the system.

# 22. Access to Images

Access to images will be restricted to those staff who need to have access in accordance with the purposes of the system. A list of such staff may be obtained from the Data Protection Co-ordinator. Access to images by third parties.

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system. Examples of third parties include enforcement agencies and tax authorities where images recorded would assist in a criminal or tax enquiry and the prevention of terrorism and disorder. In normal circumstances such agencies will supply appropriate paperwork supporting their request. For example a section 29.3 form will be supplied by the Police in normal circumstances. In emergencies where there is an imminent threat or danger appropriate paperwork may be supplied following limited disclosure.

All requests and subsequent actions will be logged including details of data released, completed request forms and timescales.

Access to images by a subject

- CCTV digital images, if they show a recognisable person, are personal data and are covered by the
  Data Protection Act. Anyone who believes that they have been filmed by CCTV is entitled to ask for
  a copy of the data, subject to exemptions contained in the Act. They do not have the right of instant
  access.
- A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Data Protection co-ordinator. Subject Access Request Forms for this purpose are contained within this Data Protection policy. The Data Protection policy outlines the Subject Access Request process which should be followed. The Data Protection co-ordinator will respond to the request in line with the timescale contained in the policy and recognise the 40 day limit to provide the data if the request is granted.
- The Data Protection co-ordinator will then view the data and decide in conjunction with the Headteacher if access to the data and/or a copy will be provided to the applicant. If access to the specified data or a copy is to be provided a decision should also be made regarding the need to seek consent or conceal the identity of other parties shown in the images if deemed necessary.
- The Data Protection Act gives the School the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.
- Details of all such requests will be logged and details of actions taken recorded in detail (Appendix C) S.A.R. Process sheet.
- If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

#### 23. Staff Data

The principles of the Data Protection act described in this policy also apply to staff data held in school.

Staff is made aware of, and agree to their data being processed by by signing their contract of employment.

Sensitive personal data will only be used by the school for legitimate business, management and school purposes and will not be transferred to third parties without consent.

Staff data will be held securely in locked cabinets or password protected electronic formats. Camrose Primary school data security policy will also apply to staff data.

Use of staff records will be limited to those personnel appointed by the Headteacher as appropriate for specific purposes.

As with all data subjects, staff may request to see, or have a copy of their record under the Subject Access Request provision of the Data Protection Act. If a full copy of the record is requested, Camrose School has 40 days to respond fully if required. Subject Access Requests should be made to the Headteacher. The exemptions listed earlier in this policy apply.

Staff records will normally be kept for 7 years after their employment has ceased. Unsuccessful applicants will have their data kept for 6 months after their application.

The Data Protection co-ordinator will address the retention periods in the annual audit. They will also remind appropriate staff of the requirement to dispose of expired data securely.

DBS checks are carried out routinely. Staff Records (Single Central Record) will only indicate whether a satisfactory or unsatisfactory check has been received and the date processed. No additional details regarding the DBS check will be held on the staff record.

# 24. Training

Our staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation or the school's processes make it necessary.

#### 25. Monitoring arrangements

Mrs S Crick is responsible for monitoring and reviewing this policy.

The DPO and DPC, checks that the school complies with this policy by, among other things, reviewing school records annually.

This document will be reviewed every 2 years.

At every review, the policy will be shared with the governing board.

# 26. Links with other policies

This data protection policy and privacy notice is linked to the freedom of information publication scheme.

## **Appendix A: Roles and Responsibilities**

#### Role of the Data Protection Officer

The role of the Data Protection Officer is to:

- Ensure that the organisation complies with the Data Protection Act 1998 and GDPR 2018, and to ensure that employees are fully informed of their own responsibilities for acting within the law and that the public, including employees, are informed of their rights under the Act.
- Be the nominated officer in the Data Protection register maintained by the Information Commissioner, notify the fact of processing to the Information Commissioner and maintain the accuracy and currency of the organisation's notification
- Co-ordinate Data Protection Act activities (including training) and facilitate such user group meetings as necessary e.g. Data Protection Coordinator's group
- Ensure organisational compliance, and conformance with the Data Protection Principles
- Develop, implement and enforce a suitable and relevant Data Protection policy and ensure it is reviewed on an annual basis
- To undertake systematic Data Protection Act compliance audits in accordance with Information Commissioner's audit tool
- Assist with investigations into complaints about breaches of the Act and undertake reporting/remedial action as required. Maintain a log of any incidents and remedial recommendations and actions.
- Maintain a log of and co-ordinate Subject access requests.
- Maintain and update own knowledge of developments in Data Protection issues.
- Be a resource for other employees by providing expert advice on the Data Protection Act and related issues.

#### Role of the Headteacher

The Headteacher is responsible for the successful implementation of this policy in their school. The Headteacher will agree and authorise all data to be released in connection with a S.A.R. (Subject Access Request)

#### Role of the Data Protection Co-ordinator

The role of the Data Protection Coordinator is to:

- Assist the Data Protection Officer to ensure compliance with this policy.
- This role will normally be carried out by J Handley & C Ashton.
- The Data Protection Officer will co-ordinate the compliance with the Data Protection Act and will be supported by the Data Protection Coordinator with the following:
- On Site Data Security
- Compliance Audit
- Training
- Subject Access Requests
- Policy review
- o Housekeeping/Compliance e.g. data archiving, deletion etc.
- CCTV compliance
- o Providing advice locally on aspects of DP compliance.

# **Appendix B: Data Collection Sheet**

Surname:		Legal Surname:
Forename:		Middle name:
Chosen name: Date of Birth:	Year:	Gender: Reg Group:
Address:	ı caı.	reg Group.
Post Code:		
Telephone:		
Email:		
Please give details of all person emergency.	ns who have parental i	responsibility and anyone else you wish to be contacted in an
Place them in the order that yo	u wish for them to be	contacted in an emergency.
D.:	- II A 1 1	
Priority Name/Relationshi	ip Home Addres	ss/Phone/Mobile/Fax Work Address Phone/Email
Travel Arrangements		
If the above information is incorrect, p	please tick the appropriate cl	hoice
Bicycle Train	Car/Van Walk	Taxi School Bus Car Share
London Underground	Public Bus Service	Metro/Train/Light Rail Other
	_	
Route		
Dietary Needs Dietary Preferences Meal Arrangement	not places tiels the time as	f meal to have for each day of the week below.
	Tue Wed Thu	Fri
School Meal	Tue vveu Thu	FII
Packed Lunch		
Home		
[36 H 15 #		
Medical Practice: Address:		
Telephone Number:		
receptione (value).		
Medical Condition(s)		
Medical Note(s)		
Γ=		
Ethnicity:		Religion:
Home Language:		First Language:
Country of Birth:		Nationality:
I/We consent to the school (through the head as the person responsible) obtaining, using holding and disclosing 'Personal data' including 'sensitive personal data' such as medical information), for the purposes of safeguarding and promoting the welfare of our child, and where necessary for the legitimate interests of the school and ensuring that all relevant legal obligations of the school and ourselves are complied with. I/We give my/our consent to such processing and disclosure provided that at all times any processing or disclosure of personal data or sensitive personal data is done lawfully and fairly in accordance with the Date Protection Act 1998.		
Signature:		Date:

# Appendix C: S.A.R. Process Sheet

SAR reference:					
Date Acknowledged					
Target Date to DPA					
Target Date for Release					
Verification of Subject					
Date:	Description of document; letter / email / report inc. who from / to and 'cc' details.	Editing done and reasons given. E.g. Third parties anonymised.	Notes – check names for editing.	Copies Taken	Signature
Correspondence					
(sections within the file are noted)					
-					
Emails Sims					
Minutes of meetings					
Notes of visits					
Student File					
CCTV					
Accident Book					
Staff Personal File					
Sickness Records					
Other (Specify)					
Signature of DPA		l		<u> </u>	1
Date					

# **Appendix D: Definitions**

Term	Definition
Personal data	Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified
Sensitive personal data	Data such as: Contact details Racial or ethnic origin Political opinions Religious beliefs, or beliefs of a similar nature Where a person is a member of a trade union Physical and mental health Sexual orientation Whether a person has committed, or is alleged to have committed, an offence Criminal convictions
Processing	Obtaining, recording or holding data
Data subject	The person whose personal data is held or processed
Data controller	A person or organisation that determines the purposes for which, and the manner in which, personal data is processed
Data processor	A person, other than an employee of the data controller, who processes the data on behalf of the data controller

# **Appendix E: Charges**

Number of pages of information to be supplied	Maximum fee (£)
1-19	1.00
20-29	2.00
30-39	3.00
40-49	4.00
50-59	5.00
60-69	6.00
70-79	7.00
80-89	8.00
90-99	9.00
100-149	10.00
150-199	15.00
200-249	20.00
250-299	25.00
300-349	30.00
350-399	35.00
400-449	40.00
450-499	45.00
500+	50.00

# Appendix F: S.A.R Release Letter

[Name] [Address]
[Date]
Dear [Name of data subject]
Data Protection Act 1998: Subject Access Request
Thank you for your correspondence of [date] making a data subject access request for [subject].
We are pleased to enclose the information you requested.
We have endeavoured to provide all the information that we hold on the data subject. However, if you have any reason to believe that there is any missing data then please

do not hesitate to seek further clarity from us on this matter.

Yours Sincerely

# Appendix G: Disposal Log

DATE	Disposal Method (how, whom etc)	DESCRIPTION	RECORDS INCLUDED	EXCEPTIONS
DATE	(how, whom etc)	Example: Annual audit of records in line with retention timescale or request from subject to change or delete record.	Records reaching D.O.B. + 25 years rule.	Individual pupils record as per retention log e.g. for legal proceedings ongoing etc.

# **Appendix H: Photo Consent form**

Name of child:

Occasionally, we may take photographs of the children at our school. We use these images

as part of our school displays and sometimes in other printed publications. We will also use them on our school

# **Photograph Consent form for use by schools**

Webbite.		
If we use photographs of individual pupils, we will not use the name of that chephoto caption. If we name a pupil in the text, we will not use a photograph article. If a child has won an award and the parent would like the name of picture we will obtain permission from the parent before using the image.	of that child to accompany the	
Records of Achievement are used to celebrate your child's progress throundividuals, groups or classes of children may appear in these records.	ughout school. Photographs of	
From time to time, our school may be visited by the media who will take photographs or film footage of a high profile event. Children may appear in these images, which will sometimes be published in local or national newspapers, or on approved websites such as Leeds Rugby Foundation.		
To comply with the Data Protection Act 1988, we need your permission before we can photograph or make any recordings of your child. Please answer the questions below, then sign and date the form where shown and return the completed form to the school.		
F	Please circle your answer	
I give permission for my child's photograph to be used within school for display purposes.	Yes/No	
I give my permission for my child's image to be used in Learning Journeys/Records of Achievements belonging to other children	S Yes/No	
I give permission for my child's photograph to be used in other printed publications.	Yes / No	
I give permission for my child's image to be used on our website.	Yes/No	
I give permission for my child to appear in the media.	Yes / No	
I give permission for my child to have a school photograph taken. I understand this printed/digital photograph can be purchased by parents.	Yes/No	
I have read and understood the conditions of use on the back of this form.		
Parent/guardian signature	Date:	
Please print name		

#### **Conditions of use**

This form is valid indefinitely from the date you sign it.

We will not re-use any photographs or recordings a year after your child leaves this school. Historic photographs will remain on our school website.

We will not use the personal details or full names (which means first name and surname) of any child or adult in a photographic image or video, on our website, in our school prospectus or in any of our other printed publications.

If we use photographs of individual pupils, we will not use the name of that child in the accompanying text or photo caption.

If we name a pupil in the text, we will not use an individual photograph of that child to accompany the article.

We may include pictures of pupils and teachers that have been drawn by the pupils.

We may use group or class photographs or footage with very general labels, such as 'a science lesson' or 'sporting events.'

We will only use images of pupils who are suitably dressed, to reduce the risk of such images being used inappropriately.

Websites and social media platforms can be viewed throughout the world and not just in the United Kingdom where UK law applies.