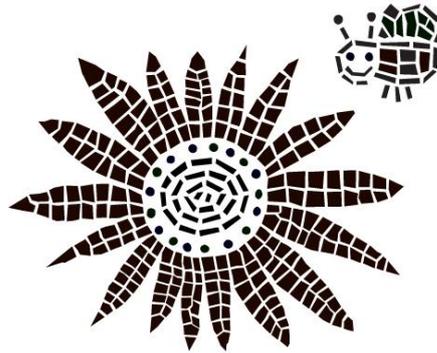


DATA PROTECTION POLICY



**Alexandra  
SCHOOL**

Alexandra Road  
Kingston upon Thames  
Surrey KT2 6SE

tel: 020 8546 7176

fax: 020 8549 8040

Email: [office@axi.rbksch.org](mailto:office@axi.rbksch.org)

[www.alexandra.kingston.sch.uk](http://www.alexandra.kingston.sch.uk)

# DATA PROTECTION POLICY

<p><b>Approved</b></p> <p>Chair of the Governing Body</p> <p>Date: May 2018</p>	<p>Head Teacher</p> <p>Date: May 2018</p>
---	---

# DATA PROTECTION POLICY

## ALEXANDRA SCHOOL

### DATA PROTECTION POLICY

#### 1. Introduction

In common with all schools, Alexandra School collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order for Alexandra School to provide education and other associated functions.

Alexandra School is registered as a Data Controller with the Information Commissioner's Office (ICO), number Z5580836.

#### 2. Purpose

This Policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the General Data Protection Regulations (2018) and other related legislation.

#### 3. Roles & Responsibilities

The Governing Body of the School and the Head Teacher are responsible for implementing good data protection practices and procedures within the School and for compliance with the Data Protection Principles.

It is the responsibility of all staff to ensure that their working practices comply with the Data Protection Principles. Disciplinary action may be taken against any employee who breaches any of the instructions or procedures forming part of this policy

A designated member of staff, the Data Protection Officer (DPO), is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law and developing related policies and guidelines where applicable. The DPO will have responsibility for all issues relating to the processing of personal data and will report directly to the Head Teacher.

The DPO will deal with subject access requests, requests for rectification and erasure, data security breaches. Complaints about data processing will be dealt with in accordance with the Schools Complaints Policy.

#### 4. Data Protection Principles

Staff and governors should adhere to the 6 principles of the Act. Data should be:

- a) Processed fairly, lawfully and in a transparent manner;
- b) Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) Accurate and, where necessary, kept up to date;
- e) Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;

## DATA PROTECTION POLICY

f) Processed in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### 5. Data Processing Procedures

- a) Alexandra School only holds data which it deems necessary to:
- facilitate and enhance teaching and learning and pastoral care;
  - ensure the safety of students and staff;
  - and carry out appropriate administration.
- b) An information audit and Data Protection Impact Assessment (DPIA) are carried out and updated as required.
- c) Privacy notices, (Appendix 4A and 4B), are issued annually to all staff and parents/carers to inform them that the school holds data on them and who the school may share this information with.
- d) All data gathered, whether relating to students, staff or other stakeholders, is kept as up-to-date and accurate as possible. Data collection sheets are issued to parents/carers and staff for checking on a rolling program, if required. When the school is informed of a change to personal data, computer and papers records are updated as soon as practical.
- e) All staff and governors have a duty to ensure that any data they hold is kept secure and that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded. Specific information regarding that can be found in our Data Protection Procedures (Appendix 3).
- f) The school follows the IRMS Information Management Toolkit for Schools Version 5 February 2016 guidelines regarding data retention for schools unless noted otherwise. Paper copies of personal data will be shredded or incinerated when no longer needed and electronic copies deleted. Hard drives are securely wiped when being disposed of. Educational records, including SEN records, are passed on to the pupils' next schools. Employee personnel records are held for the length of employment plus 6 years, before being securely disposed of, with the exception of documents relating to child protection or reportable accidents at work which will be held for longer.
- g) With regards to subject access requests, the school complies with the GDPR and follows guidance from the Information Commissioner's Office. (Appendix 1). Access requests will be dealt with within one month of a written request being received.
- h) Data may be shared with the Local Authority, DfE and other schools to allow the school to fulfil its statutory obligations or to enable the transfer of information when a student leaves or joins the school. Details of who we share data with and why are on the relevant Privacy Notice.
- i) All staff are made aware of and understand our data policies and procedures.

### 6. Photographs and videos

As part of our school activities, we may take photographs and record images of individuals within our school. We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.

Uses may include:

- Video recording of a school performance for sale to parents;

## DATA PROTECTION POLICY

- Within school on notice boards and in school brochures, newsletters, etc.;
- Outside school by external agencies such as the school photographer, newspapers, campaigns;
- Online on our school website.

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

Photographs of children may also be used within the school to alert staff of children with specific medical needs. In such cases the name, photo and specific medical requirements will be posted in such a way that they are clearly visible to staff but will be kept away from access from parents and visitors as much as is possible.

### **7. Personal data breaches**

The school will make all reasonable endeavours to ensure that there are no personal data breaches. In the unlikely event of a suspected data breach, we will follow the procedure set out in Appendix 2. When appropriate, we will report the data breach to the ICO within 72 hours.

### **8. Complaints**

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to information handling may be referred to the ICO (the statutory regulator).

### **9. Review**

This Policy will be reviewed as it is deemed appropriate but no less frequently than every two years. The policy review will be undertaken by the Headteacher or DPO.