



School Data Protection Policy

Originator: Ian Graham-Wells
September 2020

Our Commitment

Marshfields School is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA).

<https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The member(s) of staff responsible for data protection is: Mr I Graham, Deputy Headteacher

The school is also committed to ensuring that its staff are aware of data protection policies, legal requirements and adequate training is provided to them.

The requirements of this policy are mandatory for all staff employed by the school and any third party contracted to provide services within the school.

Notification

Our data processing activities will be registered with the Information Commissioner's Office (ICO) as required of a recognised Data Controller. Details are available from the ICO:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Changes to the type of data processing activities being undertaken shall be notified to the ICO and details amended in the register.

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

Personal and Sensitive Data

All data within the school's control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data shall be as those published by the ICO for guidance:

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act shall be applied to all data processed:

1. Processed fairly and lawfully
2. Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes

3. Accurate and, where necessary, kept up to date,
4. Adequate, relevant and not excessive in relation to the purposes for which it is processed
5. Not kept for longer than is necessary for those purposes
6. Processed in accordance with the rights of data subjects under the DPA
7. Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
8. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

Fair Processing / Privacy Notice

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, parents and pupils prior to the processing of individual's data.

Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation.

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control/>

The intention to share data relating to individuals to an organisation outside of our school shall be clearly defined within notifications and details of the basis for sharing given. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

Data Security

In order to assure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Risk and impact assessments shall be conducted in accordance with guidance given by the ICO:

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>

<https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2014/02/privacy-impact-assessments-code-published/>

Security of data shall be achieved through the implementation of proportionate physical and technical measures. Nominated staff shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data.

Data Access Requests (Subject Access Requests)

All individuals whose data is held by us, has a legal right to request access to such data or information about what is held. We shall respond to such requests within 40 days and they should be made in writing to: Mr I Graham

A charge may be applied to process the request.

https://ico.org.uk/media/for-organisations/documents/1586/personal_information_online_small_business_checklist.pdf
<https://ico.org.uk/media/for-organisations/documents/1235/definition-document-schools-in-england.pdf>

Photographs and Video

Images of staff and pupils may be captured at appropriate times and as part of educational activities for use in school only.

Unless prior consent from parents/pupils/staff has been given, the school shall not utilise such images for publication or communication to external sources.

It is the school's policy that external parties (including parents) may not capture images of staff or pupils during such activities without prior consent.

Data Disposal

The school recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data held in any form of media (paper, tape, electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance:

https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf

1 Principles

- 1.1 THE LAW STATES THAT ALL CHILDREN MUST RECEIVE A FULL-TIME EDUCATION FROM FIVE TO SIXTEEN YEARS OF AGE
- 1.2 We are very proud of the excellent attendance level achieved by our students.
- 1.3 Students who attend regularly tend to make excellent progress. This, of course, is due to the co-operation of parents and guardians who keep absence to an absolute minimum.
- 1.4 We work with outside agencies, including Peterborough's Inclusion Officer, who may become involved in your child's attendance.

2 Reporting student absence

- on the each day of absence contact the school to explain the reason. If we have not received contact from the parent/guardian by 11am we will contact you by telephone to ensure that you are aware of your child's absence.
- if we have no confirmation that you are aware of your child's absence by 11am, a member of staff may do a Safe and Well visit at your home address. If we receive no communication within 24 hours as to the child's whereabouts we will contact the Police and/or Social Care.
- when a student returns to school there must be an absence note handed in, signed and dated. The written note is always required unless an email has been received.
- if after 48 hours there is still no explanation, a letter will be sent home;
- if there is still no response to the school's letter, the absence will be recorded as unauthorised.

3 Monitoring and feedback

- 3.1 Three times a year, during terms 2, 4 and 6, parents will receive a full attendance report for their child. Up to date information is also available on the SIMS Parent App.
- 3.2 Any student who has provided no reasons for an absence, coded N, will also receive a letter requesting an explanation. It may be that there are perfectly valid reasons for such an attendance level. However, this may be an opportunity for parents and guardians to raise any issues that are affecting their child at School.
- 3.3 If a student has been absent regularly due to illness, the school may ask for a supporting evidence of a medical need e.g. appointment card, photograph of medication or confirmation of medical appointment. These will only valid for 6 weeks from the date of issue and the school should be kept up-to-date of ongoing medical needs.
- 3.4 A score card which contains information absence and persistent absence (across year groups)