



**JAMES ALLEN'S GIRLS' SCHOOL (JAGS)
(DfE Number 210/6002)**

WHOLE SCHOOL DATA PROTECTION POLICY

1. Introduction

JAGS adheres to the Data Protection Act 203. This policy details the procedures and security measures that safeguard our data. Protecting personal information is the shared responsibility of each member of the School.

2. Data Controller

The nominated Data Controller on behalf of the Governors of the School is Mr John Campbell Reid, Bursar & Clerk to the Governors.

3. Notification

The School's Data Protection notification defines our data subjects (the people about whom we hold personal data), our data categories (the information we hold about them) and our purposes (the reasons why we hold this information). A copy of our notification may be viewed on request, or online via the public register on the website of the Information Commissioner (www.dpr.gov.uk), reference number E0638163.

Information about Data Subjects, kinds of information or purposes not on this list will not be kept without the consent of the Data Controller. The Notification is reviewed once a year to ensure it is still accurate and up to date.

4. Access Policy

4.1 Data Subjects

Any Data Subject is entitled to view the information we hold about them. Before we disclose this information, we will obtain the following:

- Proof of identity of the Data Subject
- Payment of the £10 fee
- An indication of the types of information they wish to see

All Data Subjects access requests should be made in writing or via email. We have a documented procedure to be followed in case of a complaint by a Data Subject.

4.2 Staff

Access to personal data is strictly on a need to know basis. Access is controlled in two ways:

- For data held in electronic format, access is restricted by use of internal network access controls and permissions, and by the use of individual user IDs and passwords. Any part of

the IT infrastructure connected to an external network (eg the Internet) is protected by firewalls configured with appropriate rules. Access to our computer system is logged.

- For data held in relevant manual files, the storage areas for current data are attended during office hours. Offices and filing cabinets are locked outside of these times. Archives are stored in locked areas with restricted access.

4.3 Data Security

- Electronic data is backed up on a regular basis
- Backups are stored off site
- Uninterruptible power supplies are in place in key systems

5. Disclosure

Disclosure of personal data in response to a Data Subject Access Request will be carried out in line with this policy and current procedures.

Disclosure of personal data to third parties will only be permitted where the identity of the enquirer is known and the disclosure is necessary to fulfil one of the School's educational, pastoral or administrative purposes, as defined in our Notification. Requests should normally be in writing (or email). Where any doubt exists about the identity of the enquirer or the nature of the information to be disclosed, the matter should be referred to the Data Controller.

6. Training

All staff are made aware of their responsibilities under the Data Protection legislation.

7. Data Retention Policy

We have an active policy of deleting data that is no longer current. Data destroyed in this way is disposed of in a secure manner.

8. Consent

The School recognizes that processing of personal data requires the consent of the Data Subject. Appropriate statements are appended to key documents signed by pupils, parents and staff to ensure they are aware of what data we hold, what we do with it, and what their rights are.

9. Staff Recruitment

Where information is obtained in the course of verifying the details supplied by an applicant or in the course of pre-employment vetting, we do not use the information for any other purpose. Once verification or vetting is complete, we destroy the information, merely keeping a record that verification/vetting has been carried out and the result. The only exception to this is that we retain the references taken up at the time of appointment.

If records are retained for future consideration in the event of a further vacancy, we advise applicants and give them the opportunity to object.

10. Equal Opportunities

Information gathered from applicants for staff positions about ethnic origin, sex, disability or other personal characteristics is only used for the promotion of equality of opportunity.

Wherever possible, information used for this purpose is kept in an anonymised form so that it cannot be linked to particular employees.

11. Performance Monitoring

Our review/appraisal system is operated in accordance with accepted good practice to ensure personal information is obtained and used fairly and lawfully.

Any employee may view the information recorded in the review/appraisal system about them.

12. Accuracy

We take steps to ensure that the personal records we keep are accurate and up to date.

Pupil Data – A pupil's personal and family details are reviewed at least once per year by the pupil and their parent/guardian. A pupil's academic progress is reviewed throughout the year, and checked at least once a year for accuracy and currency.

Employee Data - We provide every employee with a copy of her/his basic record annually and ask her/him to identify inaccuracies and amendments needed.

13. Monitoring

Staff and pupil use of email and the internet are governed by a separate policy backed up by comprehensive guidelines, copies of which are maintained in the relevant Staff Handbook, and may also be viewed on the JAGS website: www.jags.org.uk

Date: December 2010

*Review arrangements: overview by Governors annually
full review by Management June 2011 (or earlier if major legislative change)*