



# Data Protection Policy

**May 2017**

## **Aims**

This policy sets out Sonning Common Primary School's commitment to the lawful and fair handling of personal data in accordance with the Data Protection Act 1998.

<http://www.legislation.gov.uk/ukpga/1998/29/contents>

## **Background**

The Data Protection Act 1998 ("the Act") regulates the holding and processing of personal data - that is information relating to living individuals, which is held either on the computer or in some cases in manual form. The Act also gives rights to individuals whose personal information is held by organisations.

Sonning Common Primary School needs to collect and use personal information in order to carry out its functions effectively. Information can be held concerning its current, past and prospective employees, and suppliers.

Sonning Common Primary School and in some circumstances its individual employees could face prosecution for failure to handle personal data in accordance with the Act.

## **Policy Statement**

Any personal data which Sonning Common Primary School collects, records or uses in any way whether it is held on paper, computer or other media will be subject to appropriate safeguards to ensure that Sonning Common Primary School complies with the Act.

Sonning Common Primary School fully endorses and adheres to the eight Data Protection Principles which are set out in the Act and summarised below:

Personal data shall be:

1. fairly and lawfully processed for specified and lawful purposes and not in any other way which would be incompatible with those purposes
2. adequate, relevant and not excessive
3. accurate and kept up to date
4. not kept for longer than is necessary
5. processed in line with the data subject's rights
6. kept secure
7. not transferred to a country which does not have adequate data protection laws.

## **Action**

In order to meet the requirements of the data protection principles and its obligations under the Act, the Council will ensure the following:

Renew its entry of the Register of Notifications held by the Information Commissioner's Office; maintain a register of particulars about the types of personal data the Council holds, purposes for which it is held and used and types of organisations to which personal data may be disclosed; appoint officers with specific responsibility for data protection in Sonning Common Primary School; any forms used to collect data will contain a 'fair processing notice' to inform the data subject of the reasons for collecting the personal information and the intended uses; any personal information that has been collected will be used only for the purposes for which it was collected; data subjects (individuals to whom the personal information relates) are able to exercise their rights under the Act, including the right:

- to be informed that their personal information is being processed

- of access to their personal information
  - to correct, rectify, block or erase information that is regarded as wrong
8. personal data will only be disclosed to third parties when it is fair and lawful to do so in accordance with the Act and with any Information Sharing Protocols;
  9. sensitive personal data will only be processed with the explicit consent of the data subject or if an exemption applies under the Act. Sensitive data is personal data about an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sex life, details of the commission or alleged commission of any offence and any court proceedings relating to the commission of an offence;
  10. procedures are in place to check the accuracy of personal data collected, retained and disclosed;
  11. review the time that personal information is retained or stored to ensure that it is erased at the appropriate time;
  12. compliance with the Code of Good Practice set out in ISO 17799 which sets out the requirements for an Information Security Management System;
  13. all employees who hold or process personal information will receive appropriate training in order to comply with the Act; and Audit compliance with this policy and the Act and any incidents involving breaches of this policy or the Act are recorded, analysed and disciplinary action taken as appropriate.

#### **Further Information**

Detailed guidance on complying with the Data Protection Act and procedures to be followed can be found at <http://www.legislation.gov.uk/ukpga/1998/29/contents>

The Information Commissioner's Office (ICO) is the independent authority set up to monitor compliance with the Act. It also issues guidance and good practice notes. The ICO's website address is [www.ico.gov.uk](http://www.ico.gov.uk)

The ICO can consider complaints about an organisation's failure to comply with the Act following the initial reply from that organisation.

#### **Dissemination**

The Policy is available on the school web site and a paper copy is held in the main school admin office. . The policy and schemes of work will be available on request to parents, LA, OFSTED and others working for the school, through the Head teacher.

#### **Reviewing the Policy**

This policy will be reviewed annually by Strategy Committee and changes made to ensure that the Policy is relevant and up to date.

Date: May 2013