

Thomas Jones Primary School

Data Protection and Freedom of Information Policy

The Governing Body of Thomas Jones School adopted this Data Protection and Freedom of Information Policy on 28th November 2016. We will ensure that we are registered with the Information Commissioner's Office and will update notifications annually. The full policy will be reviewed on a two year cycle.

1. Objectives

Our Data Protection and Freedom of Information Policy aims to provide clear, practical procedures on information governance for staff and governors to follow and monitor in line with the Data Protection Act 1998 and Freedom of Information Act 2000.

As a maintained primary school Thomas Jones holds information on pupils in order to support teaching and learning, monitor and report on progress, provide appropriate pastoral care, and assess how well we are doing. From time to time schools are required to pass on some of this data to LEAs, the DfES and to agencies, such as QCA, Ofsted and LSC, that are prescribed by law.

All personal information is handled in line with data protection principles. If the processing of personal information is carried out by others on our behalf we ensure that they follow the data protection principles and do so securely.

We keep confidential information secure when storing it, using it and sharing it with others.

2. Information Processing

2.1 Reasons/purposes for processing information

We process personal information to enable us to:

- provide education, training, welfare and educational support services
- administer school property
- maintain our own accounts and records
- carry out fundraising
- support and manage our employees

We also use CCTV systems to monitor and collect visual images for security and the prevention of crime.

2.2 Type/classes of information processed

We process information relating to the above reasons/purposes. This information may include:

- name and personal details
- family, lifestyle and social circumstances
- financial details
- education details
- employment details
- student and disciplinary records
- vetting checks
- goods and services
- visual images, personal appearance and behaviour

We also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs of a similar nature
- trade union membership
- sexual life
- offences and alleged offences

2.3 Who the information is processed about

We process personal information about:

- our students and pupils
- advisers and other professional experts
- school staff
- members of school boards
- donors and potential donors
- suppliers
- complainants and enquirers
- individuals captured by CCTV images

2.4 Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- education, training, careers and examining bodies
- school staff and boards
- family, associates and representatives of the person whose personal data we

- are processing
- local and central government
 - healthcare professionals
 - social and welfare organisations
 - police forces
 - courts
 - current, past or prospective employers
 - voluntary and charitable organisations
 - business associates and other professional advisers
 - suppliers and service providers
 - financial organisations
 - security organisations
 - press and the media

3. Notification

The Data Protection Act 1998 requires every organisation that processes personal information to register with the Information Commissioner's Office (ICO), unless they are exempt. Failure to do so is a criminal offence. All purposes for which the school are processing personal data must be notified and notification must be renewed annually and on time. If we introduce any new purposes for processing personal information we will add this information to our ICO notification.

At Thomas Jones we ensure that we meet these legal requirements.

4. Fair Processing

We give a fair processing or privacy notice to all parents/carers and pupils before or as soon as we obtain their personal information.

If we need to record personal details for any additional specific purposes, we would create a privacy notice specifically for this as the situation arises.

5. Data Sharing

At Thomas Jones school we have robust systems and procedures in place to control access to paper and electronic records containing personal information. We monitor controls to ensure good information governance.

When sharing data we will ensure we are allowed to share information with others and make sure the information is kept secure when shared.

The main organisations that we would share information with include:

- local authorities
- other schools and educational bodies
- social services

6. Publishing Information

We will ensure that we have sought permission to share any personal information before publication via letters or on our school website.

We have full photo permission from parents/carers for all photos published on our website. For photos published elsewhere we seek additional permission from parents/carers prior to supplying photos to an outside organisation.

7. Information Security

We regularly review the physical security of the school building and storage systems, and access to them. This includes the storage of paper records and the equipment used to store and process information electronically.

All portable electronic devices are kept as securely as possible on and off school premises.

Personal information that could be considered in any way private or confidential is not allowed to leave the school premises unless encrypted.

Strong passwords are ensured for any electronic equipment holding confidential personal information.

The security of paper-based personal data is taken incredibly seriously. Whenever possible, storage rooms, strong cabinets, and other storage systems with locks are used to store paper records. Papers containing confidential personal information are never left in places where there is general access. As with memory sticks and laptops, particular care is taken if documents have to be taken out of school.

We ensure a key member of staff has a good working knowledge of information rights and records management linked to an understanding of the systems in use and that training is updated as needed to keep abreast of any changes that arise.

All governors and staff have read our Data Protection and Freedom of Information Policy and are in compliance with this.

8. Disposal of Data

When disposing of records and equipment we make sure personal information cannot be retrieved. Any confidential information held as paper records are shredded; electronic memories are scrubbed clean or destroyed.

9. Subject Access Requests

Section 7 of the Data Protection Act affords individuals the right to request the personal information the school holds about them; the right of subject access. The definition of personal data for this purpose extends to any personal information held on record anywhere by the school. It includes information in correspondence and in notes made by governors, teachers and other staff. We will ensure that we meet these requirements in the case of any subject access request within 40 calendar days of receipt of the request.

10. Freedom of Information

The Freedom of Information Act 2000 affords individuals and organisations the right of access to know of and receive all recorded information such as minutes of meetings, policies, procedures, records and reports (not personal data- this would be obtained through a subject access request). We will ensure that we meet these requirements in the case of any Freedom of Information request within 20 calendar days of receipt of the request.

At Thomas Jones school we have an approved publication scheme, below, in line with the Freedom of Information Act 2000 and Local Authority Model Publication Scheme. We ensure that we reply to requests for information in line with this legislation.

In line with the Freedom of Information Act, we notify staff what personal information would be provided about them when answering freedom of information requests.

Emma Jones
October 2016

Thomas Jones Freedom of Information Publication Scheme

In line with section 19 of the Freedom of Information Act, the below publication scheme we set out our commitment to make certain classes of information available, including, policies and procedures, minutes of meetings, reports and financial information.

<u>Information</u>	<u>Where the information is available</u>
Who we are and what we do	
Instrument of Government	Hard Copy on request
Outline of the School Curriculum	website
Governing Body	website
School session times, term dates and holidays	website
School address and contact details	website
Names of key personnel	Hard Copy on request
What we spend and how we spend it	
(Information for the current and previous 2 financial years)	
Annual budget plan and financial statements	Hard Copy on request
Plans for Capital Expenditure	Hard Copy on request
Additional funding	Hard Copy on request
Procurement and projects	Hard Copy on request
Pay Policy	Hard Copy on request
Staff Allowances and Expenses	Hard Copy on request
Governors Allowances	Hard Copy on request
Staff Pay and Grading Structures	Hard Copy on request
What our priorities are and how we are doing	
Performance data	website
Latest Ofsted Report	website
Appraisal Policy	Hard Copy on request
School Evaluation Document	Hard Copy on request
School Improvement Plan	Hard Copy on request
Safeguarding and Child Protection Policy	website
How we make decisions	
Admissions Policy	Admissions statement on website

	Policy held with Local Authority
Agendas of meetings of the governing body and its sub-committees	Hard copy on request
Minutes of meetings (as above) – nb this will exclude information that is properly regarded as private to the meetings.	Hard copy on request
Our policies and procedures	
Charging and Remissions Policy	website
Pay Policy	Hard copy on request
Appraisal Policy	Hard copy on request
Capability Procedures	Hard copy on request
Safeguarding and Child Protection Policy (Including Safe Recruitment)	website
Disclosure and Barring Policy	Hard copy on request
Positive Behaviour Policy (Including Preventing Bullying and Behaviour Principles)	website
Health and Safety Policy	Hard copy on request
Staff Discipline, Conduct and Grievance (Including Dealing with Allegations of Abuse Against Staff)	Hard copy on request
Bullying and Harassment Policy	Hard copy on request
Long Term Sickness and Absence Procedures	Hard copy on request
Whistleblowing Policy	Hard copy on request
Emergency Management Plan	Hard copy on request
Procedure for Fire Drill, Emergency Evacuation and ‘Lockdown’	Hard copy on request
Policy for dealing with a Missing Child	Hard copy on request
School Security Policy	Hard copy on request
Educational Visits Policy	Hard copy on request
School Transport Policy	Hard copy on request
Single Equality Policy	Hard copy on request
Risk Assessment Policy	Hard copy on request
First Aid Policy	Hard copy on request
Supporting Pupils with Medical Needs Policy	Hard copy on request
Relationship and Sex Education Policy	Hard copy on request
Special Educational Needs and Disabilities Policy	website

Data Protection and Freedom of Information Policy	website
Admissions Policy	website and Local Authority
Accessibility Plan	Hard copy on request
Central Record of Recruitment and Vetting Checks	Live document
Complaints Procedure Statement	Hard copy on request
Governors Allowances	Hard Copy on request
Home School Agreement	Hard copy on request. All parents/carers sign a copy
Instrument of Government	Hard copy on request
Premesis Management Documents	Hard copy on request
Register or Business Interests of Governors	website
Early Years Foundation Stage Policy	Hard copy on request
Register or Pupils' admission	Live document
Register of Pupils' attendance	Live document
Records of Health and Safety Audits	Hard copy on request
Records of Risk Assessments	Hard copy on request
Training Records	Hard copy on request
Lists and registers	
Curriculum circulars	Hard copy on request
Disclosure logs	Hard copy on request
Asset register	Hard copy on request
The services we offer	
Breakfast club (3 mornings)	
After school provision, Play Plus (3 evenings)	
Extra-curricular clubs and activities	
Regular letters to parents/carers	