



Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

UNCONTROLLED if COPIED or PRINTED

Data Protection Policy

1	Nov 2016		AM	
Rev.	Date	Amendment	Completed By:	Authorised By:



Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

Table of Contents

1	Introduction	3
2	Principles	3
3	Responsibility for Data Protection	4
4	Types of Personal Data Processed by the School.....	5
5	Use of Personal Data by the School	6
6	Keeping in Touch and Supporting the School	7
7	Rights of Access to Personal Data ("Subject Access Request").....	7
8	Whose Rights.....	8
9	Data Accuracy and Security.....	8
10	Queries and Complaints	9
10.6	Appendix 1 - CCTV	10

Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

1 Introduction

- This policy applies to all areas of the school including the Early Years Foundation Stage.
- This policy is intended to provide information about how Bishopsgate School will use (or "process") personal data about individuals including current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents"). The Data Protection Act 1998 applies to all personal information about living individuals held either electronically or in a manual filing system.
- Bishopsgate School ("The School") processes information about its current, past or prospective employees, applicants, students and others who are defined as data subjects under the Data Protection Act 1998. We process personal information for a variety of reasons such as administering the admissions process, administering the employment process, recording payroll information, recording academic progress, monitoring attendance, and enabling references to be provided. The School may also be required by law to collect and use certain types of personal information to comply with the requirements of government departments to provide data.
- It applies in addition to the school's terms and conditions, and any other information the school may provide about a particular use of personal data, including e.g. the school's policy on taking, storing and using images of children.
- Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with the school's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.
- The School takes the protection of all personal information extremely seriously and is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal information.

2 Principles

All users of personal information within the School must comply with the eight Data Protection Principles.



Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

The Principles define how data can be legally processed. Processing includes obtaining, recording, holding or storing information and carrying out any operations on the data, including adaptation, alteration, use, disclosure, transfer, erasure and destruction. The eight Principles state that:

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or purposes
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is processed
4. Personal data shall be accurate and, where necessary, kept up to date
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

3 Responsibility for Data Protection

- In accordance with the Data Protection Act 1998 ('the Act'), the school has notified the Information Commissioner's Office of its processing activities. The school's ICO registration number is Z5303641 and its registered address is Bishopsgate School, Bishopsgate Road, Englefield Green, Surrey TW20 0YJ.
- The Headmaster has ultimate responsibility for ensuring that all personal information processed by the School complies with the Data Protection Act 1998 and is ultimately responsible for co-ordinating day to day data protection functions ensuring compliance with this policy and ensuring that the notification to the



Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

Information Commissioner is kept up to date.

This includes: development and implementation of the policy; notifying the Information Commissioner; responding to individual requests for access to personal information; and framing guidelines and procedures with the aim of ensuring that all personal information processed by the School complies with the Data Protection Act 1998.

- The School has appointed Alan McNish as Data Protection Officer ("DPO") who will endeavour to ensure that all personal data is processed in compliance with this policy and the Act.

4 Types of Personal Data Processed by the School

- The school may process a wide range of personal data about individuals including current, past and prospective pupils and their parents as part of its operation, including by way of example:
 - names, addresses, telephone numbers, e-mail addresses and other contact details;
 - car details (about those who use our car parking facilities);
 - bank details and other financial information, e.g. about parents who pay fees to the school;
 - past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
 - where appropriate, information about individuals' health, and contact details for their next of kin;
 - references given or received by the school about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
 - images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children as per Section 7 of the [Acceptable Use of ICT Policy](#) and as per Appendix 1 - CCTV);
- Generally, the school receives personal data from the individual directly (or, in the case of pupils, from parents). However in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual), or collected from publicly available resources.
- The school may, from time to time, need to process "sensitive personal data" regarding individuals. Sensitive personal data includes information about an individual's physical or mental health, race or ethnic origin, political or religious beliefs, sex life, trade union membership or criminal records and proceedings. Sensitive personal data is entitled to special protection under the Act, and will only

Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

be processed by the school with the explicit consent of the appropriate individual, or as otherwise permitted by the Act.

5 Use of Personal Data by the School

- The school will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, including as follows:
- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents;
- To provide education services (including SEN), career services, and extra-curricular activities to pupils; monitoring pupils' progress and educational needs; and maintaining relationships with alumni and the school community;
- For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the school's performance;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's [Acceptable Use of ICT Policy](#);
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's policy on taking, storing and using images of children as per Section 7 of the [Acceptable Use of ICT Policy](#). A letter of consent is given to every family when they join the school and if signed, will apply for the duration of the pupil's stay at Bishopsgate. Parents who have declined to give their consent and do not want their child's photograph or image to appear in any of the School's promotional material, or be otherwise published, must also make sure their child knows this;
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.



Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

6 Keeping in Touch and Supporting the School

- The school will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school may also:
- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Bishopsgate Social Committee, and Parent Year Group Representatives;
- Contact parents and/or alumni (including via the organisations above) by post, email and text in order to promote and raise funds for the school and, where appropriate, other worthy causes;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the DPO in writing, which notice will be acknowledged by the School in writing.
- Pupils, parents and guardians should be aware that where photographs or other image recordings are taken by family members or friends for personal use the Data Protection Act will not apply e.g. where a parent takes a photograph of their child and some friends taking part in the School sports day.

7 Rights of Access to Personal Data ("Subject Access Request")

- Individuals have the right under the Act to access to personal data about them held by the school, subject to certain exemptions and limitations set out in the Act. Any individual wishing to access their personal data should put their request in writing to the DPO.
- The school will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within the 40 calendar days laid down by the Data Protection Act 1998.
- You should be aware that certain data is exempt from the right of access under the Act. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The school is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any reference given by the school for the purposes of the education, training or employment of any individual.
- Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. Pupils aged 12 or over are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. All subject access requests from pupils will therefore be considered on a case by case basis.



Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

- A person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

8 Whose Rights

- The rights under the Act belong to the individual to whom the data relates. However, the school will in most cases rely on parental consent to process personal data relating to pupils (if consent is required under the Act) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted.
- In general, the school will assume that pupils consent to disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the school's opinion, there is a good reason to do otherwise.
- However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school will maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the pupil or other pupils.
- Pupils are required to respect the personal data and privacy of others, and to comply with the school's [Behaviour Policy](#) and [Acceptable Use of ICT Policy](#) and the school rules.

9 Data Accuracy and Security

- The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the DPO of any changes to information held about them.
- An individual has the right to request that inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the DPO in writing.
- The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under the Act.



Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

10 Queries and Complaints

- Any comments or queries on this policy should be directed to the DPO using the following contact details: amcnish@bishopsgatesch.uk or direct dial 01784 480221
- If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise the school [Complaints Policy](#) and should also notify the DPO.

Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

10.6 Appendix 1 - CCTV

Introduction

The purpose of this document is to regulate the management, operation and use of the Closed Circuit Television system (CCTV) at Bishopsgate School. This document forms part of the Bishopsgate Data Protection Policy.

This Code follows Data Protection Act guidelines and will be reviewed annually.

The CCTV system is owned and managed by the school.

Objectives of CCTV monitoring and recording

- To increase the personal safety of staff, students and visitors
- To protect the school buildings and assets
- To support the Police in in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in the management of the school

Statement of Intent

The CCTV system will be registered with the Information Commissioners Office under the terms of the Data Protection Act 1998 and will seek to comply with the requirements of both the DPA and the Commissioners Code of Practice. The school will treat the system and all information and recordings as data which are protected by the Data Protection Act.

Cameras will be used to monitor activities within the school and its car parks and other public areas to identify activity actually occurring, anticipated or perceived for the purposes of securing the safety and well-being of the school and its visitors.

Static cameras will not focus on private homes or property or any areas where there is an expectation of privacy. Cameras should not be directed at individuals, their property or a specific group of individuals without authorisation being obtained for Directed Surveillance to take place as set out in the Regulation of Investigatory Power Act 2000.

Materials or knowledge secured from the CCTV system will not be used for any commercial purpose.

Recordings will never be released to the media for entertainment purposes.

The CCTV system has been planned and designed for maximum coverage but it is not possible to guarantee that every incident will be observed or recorded.

Operation

Data Protection Policy			
Ref.:	H&S0015	Rev.:1	Date: Nov 2016

The cameras and monitoring software are administered, managed and maintained by the Network Manager. Access to the monitoring system is password protected. The CCTV system will be operated 24 hours a day, 365 days a year.

Image Storage

All CCTV recordings are recorded to hard disk and archived for 7 days. After this the recordings will be purged. Archived recordings can be accessed by authorised users.

Third Parties

The Data Protection Act provides Data Subjects (individuals to whom “personal data” relates) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be dealt with in accordance with the Bishopsgate Data Protection Policy.

Any viewing of recordings by the police or other authorised third party will be recorded in a log book.

Requests for recordings to be removed from site should be in writing to the Bursar. All requests will be considered in line with section 7 of the Data Protection Policy.

Recordings will be transferred to a read only disk which will be signed for by the requesting party.

All recordings remain the property of the school and may not be used for any other purpose than for what was agreed.