



Emanuel School

Data Protection Policy

Introduction

Emanuel School collects, holds and processes information about employees, pupils, parents and other individuals¹ for academic and administrative purposes, as well as to comply with its statutory obligations. When handling such information, the school, and all staff or others who process or use any personal information, are obliged to comply with the principles set out in data protection legislation.

This policy outlines the responsibilities of staff, parents and pupils when providing or processing personal information. Processing refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

At Emanuel School, the bursar is responsible for ensuring that all personal information is processed in compliance with this policy and the principles of data protection. Day to day, the head of IT and compliance will deal with any requests or enquiries and endeavour to ensure that all personal data is processed in compliance with this policy and the UK GDPR and UK Data protection Act 2018.

Notification of data held

The school provides details in its privacy notices of the types of data held and processed by the school, and the reasons for which it is processed. The privacy notices are available on the school website.

Staff responsibilities

All staff shall:

- ensure that all personal information which they provide to the school in connection with their employment is accurate and up-to-date;
- inform the school of any changes to information, for example, changes of address²;
- check the information which the school shall make available from time to time, in written or automated form, and inform the school of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. The school shall not be held responsible for errors of which it has not been informed.

When staff hold or process personal information about pupils, parents, colleagues or other individuals (e.g.: pupils' assignment, pastoral files, references to other academic institutions, or details of personal circumstances), they should refer to the Data Protection Guidelines for Staff and the school's privacy notices. These documents describe the duty of all staff to protect personal information. This policy does not form part of any employee's contract of employment and may be amended at any time.

¹ Staff, pupils, parents and other *data subjects* may include past, present or potential members of those groups. Other data subjects may include contractors, suppliers, contacts, referees, friends or family members

² Staff are advised that the school is not responsible for informing any pension providers of changes to information



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Staff should not process personal information unless:

- the processing is necessary to perform the school's legal obligations or exercise legal rights;
- the processing is in the school's legitimate interest and does not unduly prejudice the individual's privacy, or
- the individual whose details are being processed has consented to this.

Staff shall ensure that:

- when collecting personal information, the individual the information is about receives appropriate notification to inform them how the information will be used;
- information is only used for the purpose it was originally collected for;
- all personal information is kept securely - electronic data is password protected and hardcopy data is stored under lock and key; and
- personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.

When staff supervise pupils doing work which involves the processing of personal information, they must ensure that those pupils are aware of the data protection principles, in particular, the requirement to obtain the data subject's consent where appropriate.

Pupil and parent responsibilities

All pupils and parents shall:

- ensure that all personal information which they provide to the school is accurate and up-to-date;
- inform the school of any changes to that information, for example, changes of address;
- check the information which the school shall make available from time to time, in written or automated form, and inform the school of any errors. The school shall not be held responsible for errors of which it has not been informed.

Pupils may, from time to time, process personal information (for example, in assignment or research). In those circumstances, they must notify the subject teacher and bursar, who will provide further information to ensure pupils are complying with data protection legislation .

Rights to access information

Staff, pupils, parents and other data subjects in the school have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. To make a request, please contact the school at data.protection@emanuel.org.uk providing your contact details and describing the information you want.

The school aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within a calendar month of receiving the request, unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the school to the data subject making the request.



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Pupils shall be entitled to information about their marks for assessments however, this may take longer than other information to provide.

Retention of data

The school will not keep personal information longer than is necessary for the purpose or purposes for which it was collected and will take all reasonable steps to destroy, or erase from its systems, all information which is no longer required. Details of how long information will be retained are outlined in the school's Retention Policy. This is available for staff on Firefly.

Compliance

Compliance with data protection legislation is the responsibility of all members of staff and pupils. Any deliberate or reckless breach of this policy may lead to disciplinary action, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the bursar.

Any individual, who considers that the policy has not been followed in respect of personal data about him- or herself, should raise the matter with the bursar initially. If the matter is not resolved the staff grievance or parental complaints policies should be referred to. Pupils are able to make a complaint following the process outlined in the parental complaints policy.

Related Documents

- Data Protection Act 2018
- UK General Data Protection Regulations
- Privacy Notices (Parents, Staff and Alumni)
- Policy on taking, storing and using images of children
- Data Protection Guidelines for Staff



Appendix 1: Data Protection Principles

The six principles in the UK GDPR state that personal information must be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.



Appendix 2: School information processing

The school has notified the Information Commissioner that personal information may need to be processed for the following purposes:

- to provide education and training conducted outside the State system,
- welfare and educational support services,
- to administer school property and library services,
- to maintain school accounts and records,
- organise alumni associations and events,
- for fundraising purposes and
- to support and manage our staff.

Our processing also includes the use of CCTV to maintain the security of the premises and for preventing and investigating crime.

Complete details of the school's current entry on the [Data Protection Register](#) can be found in the [Information Commissioner's website](#). Select the option to **search register** and when the search form is displayed type Emanuel School into the Name box and then click on **search**

The register entry provides:

- a fuller explanation of the purposes for which personal information may be used
- details of the types of individuals about whom personal information may be held
- details of the types of personal information that may be processed
- details of the individuals and organisations that may be recipients of personal information collected by the School
- information about transfers of personal information.