



IPSWICH SCHOOL

DATA PROTECTION POLICY

I. General Statement of the School's Duties

The School may be required to process relevant personal data regarding all pupils and their parents/guardians, prospective pupils and their parents/guardians, members of staff and prospective members of staff, Friends of Ipswich School and Old Ipswichians as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

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, email addresses
- Bank details and other financial information
- Past present and prospective pupils' academic, disciplinary, admissions and attendance records
- Where appropriate, information about an individuals' health and next of kin
- References given or received by the School about pupils
- Images of pupils engaging in school activities, and images captured by the School CCTV system.
- The School may from time to time need to process sensitive personal data regarding individuals. This may include:
 - Physical or mental health
 - Race or ethnic origin
 - Political or religious beliefs
 - Sexual information
 - Criminal records

This information is entitled to special protection under the Act and will only be processed by the School with the explicit consent of the individual, or as otherwise permitted by the Act

2. Data Protection Controller

The School shall appoint a Data Protection Controller (DPC) who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998.

3. The Principles

The School shall so far as is reasonably practicable comply with the Data Protection Principles (the Principles) contained in the Data Protection Act to ensure all data is:

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries where there is not adequate data protection

4. Personal Data

Personal Data covers both facts and opinions about an individual. It includes information necessary for the teaching and pastoral care of pupils and for the running of the School, together with CCTV images from the School's security system.

5. Processing of Personal Data

The consent of a subject (or his or her parent/guardian) may be required for the processing of data unless processing is necessary for the performance of the School's obligations to a pupil or member of staff. Any information which falls under the definition of personal data and is not otherwise exempt will remain confidential and will only be disclosed to third parties with consent of the subject (or his or her guardian if appropriate).

6. Sensitive Personal Data

The School may, from time to time, be required to process sensitive personal data regarding a pupil or his or her parents/guardians, or a member of staff. Sensitive personal data includes medical information and data relating to religion, race and criminal proceedings. Where sensitive personal data is processed by the School, the explicit consent of the data subject will generally be required in writing.

7. Rights of Access to Information

From 24 October 2001 subjects may have right of access to information held by the School. Any person wishing to access their personal data should put their request in writing to the DPC, stating their reason for the request. The School will endeavour to respond to any such written request as soon as is reasonably practicable and in any event within 40 days for access to records and 21 days to provide a reply to an access information request. The information will be imparted to the enquirer as soon as is reasonably possible after it has come to the School's attention.

Pupils can make an SAR provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making.

8. Exemptions

Certain data is exempted from the provisions of the Data Protection Act which includes the following:

- the prevention or detection of crime
- the assessment of any tax or duty
- where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the School.

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the DPC.

9. Accuracy

The School will endeavour to ensure that all personal data held is accurate. The DPO must be notified of any changes to information. A subject has the right to request that inaccurate information about them is erased.

10. Enforcement

If a subject believes that the School has not complied with this Policy or has acted otherwise than in accordance with the Data Protection Act, the subject (or their parents/guardian, if appropriate) should utilize the School complaints procedure and should also notify the DPC.

11. Security

All data should be securely stored, with access by authorised persons only. All electronic data should only be stored on the School's secure network. Staff should refer to the *IT Acceptable Use Policy for Staff*.

12. Queries and Complaints

Any comments or queries should be directed to the DPO using the following contact details:

Paul Wranek
Ipswich School
25 Henley Road
Ipswich
IPI 3SG

pvw@ipswich.school

If an individual believes the School has not complied with the Act then they may contact the Information Commissioners Office

<https://ico.org.uk/>

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