



THE FULHAM BOYS SCHOOL

<i>Policy Title</i>	Data Protection Policy
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Revisions Table

<i>Version</i>	<i>Date</i>	<i>Edited by</i>
Summer 2018	Summer2018	Oli Hogg

The master copy of this document can be found on the FBS Google Drive, under the “Policies” folder. This is one of a number of policies that are reviewed by the Governing Body, the full list can be found on the FBS Google Drive in the Policies Folder. Minor revisions that just adjust factual items (eg contact details / names) can be made by the author without formal review, and must be recorded in the Revisions table above. Revisions table front sheet was added to all policies Summer 2018.



DATA PROTECTION POLICY

Date of Next Review: Summer 2019

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1. AIMS

1.1 To outline The Fulham Boys School approach to the collection and management of data.

1.2 To describe the procedures that are taken to ensure the integrity and security of data.

1.3 To comply with the Data Protection Act 1998 and any subsequent legislation and guidance.

2. PRINCIPLES

2.1 The Fulham Boys School will obtain and process data fairly and lawfully by adopting the following principles:

2.1.1 We will only collect and hold data when there exists a clear and justifiable reason for doing so.

2.1.2 We will take every reasonable step to ensure that the data is kept securely.

2.1.3 We will inform all data subjects of the reasons for any new, or change to data collection, and who might have access to that data.

2.1.4 We will make every reasonable effort to ensure that data is accurate and kept up-to-date. Where necessary the subject of such data will be asked to confirm that what has been recorded is accurate.

2.1.5 We will destroy data when the reason to hold it ceases to be relevant.

2.1.6 We will ensure that all data subjects are given their right of access to personal data.

2.1.7 We will ensure continued registration with the Information Commissioner's Office

3. DATA COLLECTION

3.1 Information about the use of personal data will accompany any appropriate collection forms. If details are given verbally, the person collecting will explain the issues before obtaining the information.

3.2 No Fulham Boys School employee will knowingly mislead or deceive any other person about the purpose for which information is being collected. Individual members of staff can be personally liable in law under the terms of the Data Protection Act. They may also be subject to claims for damages from persons who believe that they have been harmed as a result of inaccuracy, unauthorised use or disclosure of their data.

3.3 A deliberate breach of this Data Protection Policy will be treated as disciplinary matter.

4. DATA MANAGEMENT

4.1 Simon Kellie is the Data Protection Officer (DPO) to take into account the new GDPR changes coming into effect on 25th May 2018. The DPO's responsibilities include, but are not limited to:

- Educating the school and its staff on important compliance requirements
- Training staff involved in data processing
- Conducting audits to ensure compliance and address potential issues proactively
- Serving as the point of contact between the school and GDPR Supervisory Authorities
- Monitoring performance and providing advice on the impact of data protection efforts
- Maintaining comprehensive records of all data processing activities

- Interconnecting with data subjects or parents to inform them about: how their data is being used; their rights to have their, or their child's personal data erased; the measures in place to protect their, or their child's, personal information
- 4.1 The School's management information system (MIS), CHQ and Go 4 Schools will store data for attendance, punctuality, progress and attainment, behaviour, timetable and day-to-day organisation, demographic and ALN. It will provide a platform for recording, reporting, monitoring and evaluation.
- 4.2 The School's MIS, CHQ and Go 4 Schools will be tightly integrated with the School's Learning Platform, allowing for the efficient recording of data on boys' progress and the effective use of such data to inform learning and teaching.
- 4.3 The Fulham Boys School will also hold records on staff members to inform performance management, continuous professional development and financial management procedures.
- 4.4 Parents will have access to key information about their son's progress, attainment, attendance, punctuality and behaviour in real-time via a secure internet connection, through the School's Learning Platform.

5. ACCESS TO DATA

- 5.1 All School data is to be stored securely and centrally through predominantly electronic storage methods.
- 5.2 Personal information will be disclosed only to those who, in the view of the Headmaster, have a demonstrable need to know the information.
- 5.3 The School will ensure and maintain an appropriate level of security of access to its premises, equipment, network, programmes, data and documentation.
- 5.4 A structured allocation of staff and student access rights will protect confidentiality and the security of data.
- 5.5 All existing and newly appointed staff who have access to personal information will receive training on data protection procedures.
- 5.6 Any information requested which relates to a third party will not be made available without the express permission of the third party.
- 5.7 The School reserves the right to levy a reasonable administrative charge to meet the cost of any significant request for data.
- 5.8 In exceptional circumstances, repeated or disproportionate requests, may be deemed vexatious and such requests may be refused by the School.

6. STUDENT DATA

- 6.1 All boys will have a set of specific data regarding their performance on intake. Further data on student performance will be generated by the termly reporting system and will be centrally stored on the school's management information system. This data will also be stored on Go 4 Schools.
- 6.2 This data will be reviewed regularly, and amended as appropriate.
- 6.3 There will be appropriate levels of security to prevent open access to all of the details.

6.4 Information on students will include:

- 6.4.1 Contact details
- 6.4.2 Attendance information
- 6.4.3 Assessment and performance data
- 6.4.4 Information relating to obligations under the 2010 Equality Act (see Equal Opportunities policy)
- 6.4.5 Special Educational Needs
- 6.4.6 Medical information
- 6.4.7 Information about the involvement of social services with individual pupils where this is needed for the care of the boy.

6.5 The Fulham Boys School is required to keep an attendance register on all our boys during the day. In addition a record is kept as to whether any absences are authorised or unauthorised. Individual attendance reports will be available to parents, tutors and other appropriate staff.

6.6 From time to time the school may be required to pass student specific data to:

- 6.6.1 A school to which they may be transferring
- 6.6.2 The Department of Education, and any of its' agencies
- 6.6.3 The Local Authority
- 6.6.4 Any institution where an agreed placement has been arranged

6.7 The Local Authority and Department for Education use the personal information collected to do research. They use the results of the research to make decisions on policy and the funding of schools, to calculate the performance of schools and help them to set targets. The research is done in a way that ensures individual pupils cannot be identified.

6.8 The School uses the information it collects to administer the education it provides to pupils. For example:

- 6.8.1 the provision of educational services to individuals
- 6.8.2 monitoring and reporting on pupils' educational progress
- 6.8.3 the provision of welfare, pastoral care and health services
- 6.8.4 the giving of support and guidance to pupils, their parents and legal guardians
- 6.8.5 the organisation of educational events and trips
- 6.8.6 planning and management of the school.

6.9 Parents will have access to key information about their son's progress, attainment, attendance, punctuality and behaviour in real-time via a secure internet connection through the School's Learning Platform. They will be entitled to receive a copy of their son's record upon request.

6.10 The boys' themselves also have the right of access. The school reserves the right to discuss with parents/carers any request, from a boy under the age of 16 years of age, before complying with the request. However, the normal position will be, that secondary aged students have sufficient understanding of their rights for any request they make to be honoured.

7. STAFF DATA

7.1 Personal data will be held on the School's management system and will be reviewed regularly, and amended as appropriate. There will be appropriate levels of security to prevent open access to all of the details.

7.2 Staff have the right to access all the data that the School holds on them. In the first instance access can be arranged through the School's Office & Logistics Manager.

7.3 All employees will have a personnel file. This will include the following:

- 7.3.1 Application form and supporting letter
- 7.3.2 References
- 7.3.3 Letter of appointment
- 7.3.4 Contract of employment
- 7.3.5 Salary
- 7.3.6 Personal Details
- 7.3.7 DBS Disclosure
- 7.3.8 Record of absence (annual leave and sickness)
- 7.3.9 Professional communication relating to the member of staff
- 7.3.10 Records of professional discussion and performance management interviews
- 7.3.11 Salary review sheet
- 7.3.12 Income tax documents
- 7.3.13 Requests for financial information (e.g. mortgage)
- 7.3.14 Maternity related information