



# THE FULHAM BOYS SCHOOL

<b>Policy Title</b>	Data Protection Policy
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<b>Reviewed By</b>	Mark Harris
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## Revisions Table

<b>Version</b>	<b>Date</b>	<b>Description of Change/Item edited</b>
		No amendments

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**

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## **1. AIMS**

This Policy will be interpreted in line with the Christian values and ethos of the school and must be read consistently with all other material policies of the School. For the purposes of all School policies please refer to the definitions guide (not all defined terms will be material to all policies or the procedures authorised by the governing body under it).

1.1 This Policy will be interpreted in line with the Christian values and ethos of the school and must be read consistently with all other material policies of the School. For the purposes of all School policies please refer to the definitions guide (not all defined terms will be material to all policies or the procedures authorised by the governing body under it).

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

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

1.4 To comply with the Data Protection Act 1998, the General Data Protection Regulations (GDPR) of 2018 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 The Fulham Boys School will ask all parents of boys coming on roll at the School for a range of personal information to help assist with the normal running of the School.
- 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. A deliberate breach of this Data Protection Policy will be treated as disciplinary matter.
- 3.3 Anyone applying to send their son to The Fulham Boys School will provide a range of personal information to The Fulham Boys School Limited which will assist with the normal running of the School.
- 3.4 In carrying out its functions The Fulham Boys School Limited may also arrange that some or all of the information so collected is transmitted to any or all of three entities which are all integral to the School's ability to provide its education plan: The Fulham Boys School, The FBS Foundation and FBS Friends.
- 3.5 Any additional information that one of these entities collects is confidential to that entity only and will not be exchanged without the explicit permission of the data subject. Each of these entities may ask parents of boys coming on to the School roll for a range of personal information which is pertinent to the functions of that entity. For example, the FBS Foundation may collect data on parental contributions to the FBS Education Fund, whilst The Fulham Boys School may collect data on a pupil's health or individual needs.
- 3.6 No employee or representative of The Fulham Boys School Limited or any of the three entities referred to above will knowingly mislead or deceive any other person about the purpose for which information is being collected. Individual members of staff, or anyone else handling data on behalf of The Fulham Boys School Limited are 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. A deliberate breach of this Data Protection Policy by a member of staff will be treated as disciplinary matter.

#### **4. DATA MANAGEMENT**

4.1 The School will appoint a Data Protection Officer pursuant to the General Data Protection Regulations 2018. Simon Kellie is the School's current Data Protection Officer (DPO). 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

4.2 The School's management information system (MIS), CHQ (activity management software that tracks and manages activities outside the core curriculum) and Go 4 Schools (assessment and data management information system) will store personal data for attendance, punctuality, progress and attainment, behaviour, timetable and day-to-day organisation, demographic and additional learning needs. It will provide a platform for recording, reporting, monitoring and evaluation personal data.

4.3 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.

4.4 The Fulham Boys School will also hold personal data of staff members to inform performance management, continuous professional development and financial management procedures.

4.5 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 be implemented to 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 Parents (including guardians) and students as (data subject) have the right to find out what personal information is being held or used by The Fulham Boys School, The Fulham Boys School Limited and the three entities referred to above and for what purpose. Data subjects are able to exercise this right by making a 'subject access request' (SAR). The Fulham Boys School recommends that such requests are made in writing. Subject access requests should outline clearly:
- 5.7.1 Where they want the request to be sent.
  - 5.7.2 Make the request directly to the Headmaster.
  - 5.7.3 State clearly what the subject access request is for.
  - 5.7.4 The SAR must include:
    - 5.7.4.1 The name of the person making the request
    - 5.7.4.2 Contact details
    - 5.7.4.3 Any information that could be used by The Fulham Boys School to help prove your identity (or the identity of the data subject if the SAR is being made by a parent/guardian).

- 5.8 The Fulham Boys School will always obtain consent from parents before passing personal information relating to students and/or parents themselves to any third party/data processor outside of The Fulham Boys School organisation (as described above).
- 5.9 Further information about how to make a SAR can be found on The Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)).

## **6. STUDENT DATA**

6.1 All boys will have a set of specific data held by the School regarding their performance information provided by parents and transferred from primary schools or other external agencies 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 legally 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 on personal information (in such circumstances and if there is a legal justification, consent may legally not need to be sought prior to the personal information being passed on to):

- 6.6.1 A School to which they may be transferring
- 6.6.2 The Department for Education, and any of its agencies
- 6.6.3 The Local Authority and other associated professionals/agencies
- 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. Students are able to make SARs when they reach the age of 13. Students over the age of 13 are also able to provide consent for their personal information to be passed on to third parties/data processors.

## **7. STAFF DATA**

7.1 Personal data will be held on the School's management information 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 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

8 All staff members employed by The Fulham Boys School and Governors will be required to sign and agree to the Staff ICT Policy Declaration and Staff Data Protection Declaration.