



Policy

Data Protection Policy and Privacy Notice

Introduction

The Trustees of Oakham School acknowledge their overall responsibility for ensuring that:

- Personal information relating to current and former pupils, parents and staff is processed in accordance with Education Regulations and all other statutory provisions, including the requirements of the Data Protection Act 1998 and subsequent legislation;
- All members of staff involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities. Any enquiry relating to Data Protection should be addressed in writing to the Director of Operations and Strategic Planning, who is Oakham School's Data Protection Controller (DPC).

This data protection policy and privacy notice applies to Oakham School, the Old Oakhamian (OO) Club and the Oakham Foundation, collectively referred to as Oakham School within this document.

1. Fair Obtaining and Processing of Data

Oakham School undertakes to process data fairly and in accordance with the Data Protection Act 1998 and the Act's data protection principles as well as the General Data Protection Regulation (GDPR).

We shall strive to:

- Only process personal data fairly and lawfully;
- Always specify the purpose(s) for which we are collecting personal data and then only use that data for those purposes which shall be lawful;
- Only collect the personal data that we need for the purposes that we specify;
- Keep the personal data that we collect accurate and up-to-date;
- Keep personal data as long as necessary to achieve the purposes for which we collected the data;
- Process personal data in accordance with the rights of the people who are the subject of the data;
- Adopt technical and organisational measures to ensure the data is secure and to prevent loss;
- Unauthorised or unlawful processing of personal data;
 - Accidental loss or destruction of, or damage to, personal data;
 - Ensure that we do not transfer any personal data outside of the European Economic Area unless we have specifically addressed the legal issues about this particular subject.

2. Data Collection Purposes

In order to carry out its ordinary duties to staff, pupils and parents, the school may process a wide range of personal data about individuals as part of its daily operation.

Some of this activity the school will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data

Oakham School collects and uses information about a variety of people, such as:

- Our current, past and future pupils;
- The parents of our pupils;
- Contacts at our suppliers;
- Contacts at local authorities and other Government bodies;
- Current, past and future staff;
- Job applicants.

Types of personal data processed by the school

- 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;
- in the case of bursary applicants, financial circumstances of the parents;
- 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);

We may hold information about former pupils and parents from the following sources:

- Data that you have provided to the School, the OO Club and the Oakham Foundation;
- Personal information provided by us from social networks, such as Facebook, LinkedIn and Twitter, where you have interacted with us and that is relevant for our purposes listed below. You can manage this information in the privacy settings of each Social Network. Please also review the privacy policy of the respective Social Network that you are using to learn more about the information the network makes available;
- Personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual);
- Personal information obtained from publicly available sources, such as company websites, Companies House, electoral roll, contact detail directories and news sources that is relevant for us for our purposes listed below.

We use personal data for the specified lawful purposes:

- To comply with statutory duties and obligations related to education and administration;
- To secure and maintain the pupils' health, safety and welfare and to provide appropriate pastoral and medical care;
- To provide parents/those with parental responsibility with information in relation to pupil progress, achievements, attendance and other school-related matters;
- In respect of administrative and financial matters, including donation processing;
- To enable the School to provide references;
- To assess how the School is performing, including the destination of former pupils;

- To assist with fundraising and promotion, including the use of analysis and profiling to allow us to suggest a level of giving that you feel comfortable with to ensure that our communications with you are relevant to you and are not excessive.

In order to meet our stated data protection goals, we will ensure that:

- We appoint someone with specific responsibility for data protection in the business;
- Everyone managing and handling personal data understands that they are responsible for following good data protection practice;
- Everyone managing and handling personal data is appropriately trained to do so;
- We only allow authorised agents who work on our behalf to access your personal data and will never exchange your details or sell or rent your data to any other commercial or charitable organisation;
- Any third party organisation that processes data on our behalf has adequate measures in place and provides us with written guarantees to this effect;
- We deal with queries about handling personal data promptly and courteously;
- We set out clear methods of handling personal data;
- We carry out a review and assessment of how we manage personal data at least once in every three years.

3. Subject Access

Pupils (both current and former), parents and staff have a right to access their own personal data (except where otherwise specified pursuant to legislation). Requests for access by pupils, parents or staff must be made in writing by completing a 'data subject access form' available from the DPC. Completed forms should be submitted to the DPC.

Provided that there is sufficient information to process the request, an entry will be made in the Subject Access log book, showing the date of receipt, the data subject's name, the name and address of the person requesting the information (if different), the type of data required (e.g. Pupil Record, Personnel Record), and the planned date by when the information will be supplied. Should more information be required to establish either the identity of the data subject (or agent) or the type of data requested, the date of entry in the log will be the date on which sufficient information has been provided. There may be an administrative fee payable to the School for this service. Requests for information will be dealt with within 30 calendar days from receipt of request (except where legislation provides for disclosure within a shorter timescale).

We shall take steps to ensure that this Policy or its details are available to:

- Pupils (current and former) and the parents of pupils;
- Staff;
- Suppliers;
- Anyone else that might have an interest in it or ask for a copy.

4. 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.

5. Accuracy

The School will endeavour to ensure that all personal data held in relation to workers is accurate and kept up to date. Workers must notify the DPC of any changes to information held about them. A worker has the right to request that inaccurate information about them is erased.

6. Disclosure to Third Parties

Only authorised and trained members of staff are allowed to make external disclosures of personal data. External disclosure is envisaged in (but not limited to) the following circumstances:-

- to comply with statutory duties and obligations;
- to maintain/secure the pupil/staff member's health, safety and welfare;
- to provide parents/those with parental responsibility with information about the pupil's progress, achievements, attendance, attitude, aptitude and general demeanour within or in the vicinity of the School;
- administrative/financial matters;
- the provision of references. Copies of references will not be provided to the person who is the subject of the reference. The subject's specific consent will be sought before any reference is given;
- exam results which may be disclosed to the media or education bodies for publication (either in grade order or alphabetically). Any pupils or parents objecting to such publication must say so in writing to the Headmaster; and
- in the best interests of the School or pupil generally. There may be unavoidable disclosures, for example to an engineer during maintenance of the computer system. In such circumstances the engineer will be required to sign a form promising not to disclose the data outside the School. Data used within the School by administrative staff, teachers, Senior Management and Trustees will only be made available to them where the person requesting the information is working within the School and needs to know the information in order to undertake their work. All staff will be made aware of this policy and their duties under the Data Protection Act.

7. Use of Photographs

From time to time the School may wish to use photographs or images of pupils for the following purposes:

- Printed Marketing materials and Media - including (but not exclusive to) the prospectus, Oakhamian, promotional flyers and any brochures relating to Oakham School (e.g. Arts Calendar, directories etc.) Newspapers or magazines.
- Online - including our own website, and other external websites (including directories, magazines and newspaper feeds, news from associations such as IB, HMC, and Agents etc.)
- Social Media e.g. any social media that the school chooses to participate in (e.g. Twitter, Facebook, LinkedIn, Google+, Instagram, Pinterest, etc.) and any social media sites used by our wider community including, but not exclusive to, other schools, school associations and media.
- Video and audio content, filmed or recorded either by ourselves or any other parties approved by the school (including promotional videos, videos of trips/activities, radio interviews and school entertainment)

Where possible, the school will endeavour not to identify individuals. However, as this is not always possible and given that the School wants to celebrate the successes of its pupils and teams, in some instances individual names will be published (on and off line) alongside their photograph. The School will not publish photographs or images of individual pupils or name pupils when photographs are used, whether current or former pupils, without having obtained a signed Parent Contract, indicating consent to use of pupil data and photographs, from the pupil's parents or those with parental responsibility. In any event the School will only use photographs of pupils in suitable dress.

8. Security

The School undertakes to use its best endeavours to ensure the security of personal data by adopting appropriate organisational and technical measures. Appropriate building security measures are in place, such as alarms, window bars, deadlocks and computer hardware cable locks. Only authorised persons have access to disks, tapes and printouts which are locked away securely when not in use. Visitors to the School are required to sign in and out, to wear identification badges whilst in the School and are, where appropriate, accompanied. Security software is installed on all computers containing personal data. Only authorised users are allowed access to the computer files and password changes are regularly undertaken. Computer files are backed up regularly.

9. Review

We shall review this Policy:

- On the introduction of any new substantive changes to the law relating to data protection;
- If we become aware of any breaches of this Policy or any relevant legislation;
- At least every three years when we shall also carry out an appropriate form of data protection audit.

The purpose of any review of this Policy will be:

- To ensure that the Policy adequately reflects the legal and business issues relating to data protection;
- To identify any improvements to the Policy arising out of its implementation and use.

10. Data Protection Staffing and Reporting

Oakham School's Data Protection Controller (DPC) is the Director of Operations and Strategic Planning (DOSP). The DOSP will work closely with the Head of Information Services, the Data Systems and Web Services Manager, the Academic Data Manager, the Development Director, the Human Resources Manager and the Finance Bursar on data protection. The DPC is the person with responsibility for data protection compliance. The DPC shall report to the Trustees on an annual basis at the Trustees' Policy & Compliance Committee Meeting held in the Winter term of each academic year, and at such other times as may be necessary. Because personal data pervades almost every aspect of the School, every member of staff has a responsibility to process personal data in accordance with this Policy and other applicable policies, manual, procedures or guidance. All staff will be trained about the need to maintain confidentiality and in relation to the legislative requirements.

11. Failure to Comply With This Policy

Oakham School will treat any failure to comply with this Policy very seriously and shall regard it as a matter for internal discipline in accordance with the terms of the Disciplinary Procedures.

Simon Piggott

16 May 2018

Review Date September 2019

APPENDIX ONE

Data Protection Policy Oakham School – Data Subject Access Form

Enquirer's Surname

Enquirer's Forenames

Enquirer's Address

..... Enquirer's Postcode

Email Address Home Phone Number

Mobile No

Are you the person who is the subject of the records you are enquiring about (i.e. the "Data Subject")?
YES / NO If NO, please contact the Director of Operations at the School to determine whether or not we need to have express written permission from the 'Data Subject' to divulge the requested information to you. N.B. this is generally necessary for all information, other than Educational Progress Reports requested by parents. Do you have parental responsibility for a child who is the "Data Subject" of the records you are enquiring about? YES / NO If NO, please state the nature of your relationship with the data subject. Please note that the School may require proof of identity before disclosing any data.

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Name and Date of Birth of child or children about whose personal data records you are enquiring

Name D.O.B

Name D.O.B

Description of information or topic(s) requested

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Please despatch reply to: (if different from enquirer's details as stated on this form) Name

.....

Address

..... Postcode

If applicable, I undertake to pay Oakham School an administration fee prior to the requested information being sent to me in accordance with any agreement with the Director of Operations.

Signature of data subject or subject's parent/guardian

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Printed name of person signing:

Date:

APPENDIX TWO

Data Protection Policy Oakham School – Data Subject Consent To Access Form

Data Subject's Surname Data Subject's Forenames

Data Subject's Address

.....

Data Subject's Postcode Email Address

Home Phone Number Mobile No

Enquirer's Surname

Enquirer's Forenames

Enquirer's Address

.....

Enquirer's Postcode..... Email Address

Home Phone Number Mobile No

Description of information or topic(s) requested

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Please despatch reply to: (if different from enquirer's details as stated on this form)

Name

Address

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Postcode

I understand that I am able in law to withhold this information from the Enquirer(s) and despite my right to withhold this data; I hereby consent to the School releasing the Subject Data to the Enquirer(s).

Signature of data subject

Printed name of person signing

Date signed