 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

DATA, INFORMATION & RECORDS POLICY


Incorporating:

- **Data Protection and Information Security, Freedom of Information Policy, Freedom of Information Publication Scheme, Privacy Notices**

Person responsible for policy formulation, implementation, maintenance and evaluation	Head Master
Persons consulted	IT Network Manager Data Officer Bursar
Adopted by Governors on	19 March 2015
Current Review	09 Nov 23
Date of future review	Nov 24

REVISION STATUS TABLE

Revision No	Effective Date	Summary of Revision	Reviewed by	Date
v1.0	March 2015	New Policy		
V1.1	October 2016	Revision of original policy	SMT	
V1.2	April 2019	Periodic review	SMT	26 April 2019
V1.3	May 2021	Inc of sharing of DBS data w Eton	SLT	24 May 2021
V1.4	10 Nov 22	Periodic review	GFC	10 Nov 22
V1.5	09 Nov 23	Periodic review	GFC	09 Nov 23

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

POLICY DOCUMENT REVIEW

This Policy document is subject to a periodic Review (annually) by Holyport College that is formally documented to ensure its continuing suitability, adequacy and effectiveness. Areas subject to review include, but are not limited to, follow up action from previous reviews, policy conformity, review of complaints, status of corrective and preventive actions, and improvements for the forthcoming year. Holyport College reserves the right to amend this Policy by notice following such review in circumstances in which it considers such change to be necessary or appropriate.

DATA PROTECTION

1. Purpose

The purpose of this policy and procedure is to ensure compliance of Holyport College (the College) with its obligations as set out in applicable Data Protection legislation.

The College has appointed the Satswana Ltd as its Data Protection Officer (DPO).

2. Definitions

The College is a **Data Controller** for the purposes of the Data Protection Act 2018.

Personal data is information that relates to an identifiable living individual that is processed as data. Examples would be names of staff and pupils, dates of birth, addresses, national insurance numbers, school marks, medical information, exam results, SEN assessments and staff development reviews.


Processing means collecting, using, disclosing, retaining, or disposing of information.

Sensitive personal data is information that relates to race and ethnicity, political opinions, religious beliefs, membership of trade unions, physical or mental health, sexuality and criminal offences. There are greater legal restrictions on processing sensitive personal data than there are on personal data.

3. Data Protection Principles

The Data Protection Act 2018 sets out eight data protection principles which apply to all information held electronically or in structured files. To comply with the data protection principles the College is required to ensure that all personal data is:

- processed fairly and lawfully;
- obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes;
- accurate and, where necessary, kept up to date;

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

- adequate, relevant and not excessive in relation to the purposes for which it is processed;
- not kept for longer than is necessary for those purposes;
- processed in accordance with the rights of data subjects under the DPA;
- protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage; and

4. Notification with the Information Commissioner's Office (ICO)

The College has notified as a Data Controller with the ICO. Its registration number is ZA046885.

The College will renew the registration annually. In addition, if the College introduces a new purposes for processing personal information, such as the installation of CCTV, then it will notify the ICO, by e-mail at notification@ico.gsi.gov.uk, requesting that the new purpose be included in the registration.

5. Fair Processing

The College is committed to being clear and transparent about what type of personal information we hold and how it is used. The 'Privacy Notice for Pupils and their Parents and Guardians' (see below) is published on the College Website.

6. Information Security

6.1. Objective


To comply with the seventh data protection principle, the College is required to put in place appropriate security measures. This requires the College to ensure that its information base is protected against identified risks so that it may continue to deliver its services and obligations to the community. It also seeks to ensure that any data security incidents have a minimal effect on its business and academic operations.

6.2. Responsibilities

The Head Master of the College has direct responsibility for maintaining the Information Security policy and for ensuring that the staff of the College adheres to it.

6.3. General Security

It is important that unauthorised people are not permitted access to College information and that we protect against theft of both equipment and information. This means that we must pay attention to protecting our buildings against unauthorised access. Staff must:

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

- Not reveal passwords, pin numbers or building entry codes to people that you do not know or who cannot prove themselves to be employees;
- Beware of people tailgating you into the building or through a security door;
- If you don't know who someone is and they are not wearing some form of identification, ask them why they are in the building;
- Not position screens on reception desks where members of the public could see them;
- Lock secure areas when you are not in the office;
- Not let anyone remove equipment or records unless you are certain who they are. Visitors and contractors in College buildings should always sign in a visitor's book held in main reception, and to wear identification lanyards / badges whilst in the College (except where this would compromise their safety, e.g. in operating machinery) and are, where appropriate, accompanied.

6.4. Security of Paper Records

Paper documents should always be filed with care in the correct files and placed in the correct place in the storage facility.

Records that contain personal data, particularly if the information is confidential or sensitive should:

- be locked away when not in use and not be left on desks overnight, left open or unattended where others may find them;
- be in a known location (i.e. who has them)
- not given to someone else to look after.


6.5. Security of Electronic Data

Most of our data and information is collected, processed, stored, analysed and reported electronically. It is essential that our systems, hardware, software and data files are kept secure from damage and unauthorised access. College staff must:

- Prevent access to unauthorised people and to those who don't know how to use an item of software properly. It could result in loss of information;
- Keep suppliers CDs containing software safe and locked away. Always label the CDs so you do not lose them in case they need to be re-loaded;

When the College buys a license for software, it usually only covers a certain number of machines. Staff are asked to ensure that they do not exceed this number, to avoid a breach of contract.

The College used 2 factor authentication for access to emails and records from outside the College. This is in place for all key accounts.

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

Passwords are a critical element of electronic information security. All staff must ensure their account is password protected and manage their passwords in a responsible fashion. Passwords must:

- Not be written down or shared with others (even inadvertently)
- be at least 8 characters;
- be alphanumeric (include numbers as well as letters)
- be something that you can remember but not anything obvious (such as “password”) or anything that people could guess easily such as your name; Staff can be held responsible for any malicious acts by anyone to whom they have given their password;

Password must be changed regularly, and certainly when prompted or if there is a concern someone else may know what it is.

Many database systems, particularly those containing personal data should only allow a level of access appropriate to each staff member. The level may change over time.

6.6. Use of E-Mail and Internet

The use of the College’s e-mail system and wider Internet use is for the professional work of the College. Reasonable personal use of the system in a member of staff’s own time is permitted but professional standards of conduct and compliance with the College’s wider policies are a requirement whenever the e-mail or Internet system is being used.


The College uses a filtered and monitored broadband service to protect our pupils. Deliberate attempts to access web sites that contain unlawful, pornographic, offensive or gambling content are strictly prohibited. Staff discovering such sites on the system must report this to their line manager immediately. The Head Master will ensure that the sites are reported to the College IT Network Manager for filtering.

To avoid a computer virus arriving over the Internet:

- do not open any flashing boxes or visit personal websites;
- Do not send highly confidential or sensitive personal information via e-mail;
- Save important e-mails straight away;
- Unimportant e-mails should be deleted straight away;
- Do not send information by e-mail, which breaches the Data Protection Act. Do not write anything in an e-mail which could be considered inaccurate or offensive, and cannot be substantiated.

6.7. Electronic Hardware

All hardware held within College is included on the asset register, maintained by the IT Manager;

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

When an item is replaced, the register should be updated with the new equipment removed or replaced;

Do not let anyone remove equipment unless you are sure that they are authorized to do so;
In non-secure areas, consider using clamps or other security devices to secure laptops and other portable equipment to desktops.

6.8. Homeworking Guidance


When staff work outside of the College or at home, all of the ‘Information Security’ policy principles still apply. However, working outside of the College presents increased risks for securing information. The following additional requirements apply:

- Do not access confidential information when you are in a public place, such as a train and may be overlooked;
- Do not have conversations about personal or confidential information on your mobile when in a public place. Ensure that, if urgent, you have your conversation in a separate room or away from other people;
- Do not upload any school data to your personal cloud accounts.

Remote log-in must always be used using a system approved by the IT Network Manager so data remains on the school servers and does not have to be taken off site or transferred to a member of staff’s personal computer.

If you use a laptop, tablet or smart phone it is acknowledged that remote access may not be possible and therefore members of staff must:

- Ensure that it is locked and password protected to prevent unauthorized access;
- Make sure that you don’t leave your device anywhere it could be stolen. Keep it with you at all times and secure it when you are in the College;
Portable devices or memory sticks that contain personal data must be encrypted. Personal data may not be taken off the College’s site or put onto a portable device without the express permission of the Head Master or the Bursar. Taking personal data off-site on a device or media that is not encrypted is a disciplinary matter;
- Ensure personal data is not stored on the hard drive; The Bursar will maintain a register of:
 - protected data that has been authorized for use on a portable device;
 - the fixed period of time that the authorization relates to;
 - the reason why it is necessary to place it on the device;
 - the person who is responsible for the security of the device and its data;
 - the nature of encryption software used on the device;
 - confirmation of the date that the data is removed from the device.

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

When working on confidential documents at home do not leave them lying around where others may see them; dispose of documents using a shredder;

6.9. Audit of Data Access

Where possible the College's software specifications will include the function to audit access to confidential data and attribute access, including breaches of security, to specific users.

6.10. Data Backup

The College will arrange that all critical and personal data is backed up to multiple secure locations across the college site. All data will be transferred over secure encrypted connections. If the College is physically damaged critical data backups will allow the Trust to continue its business at another location with secure data. Data backup should routinely be managed on a rolling daily process to secure areas.

7. Disposal of Information

Paper records should be disposed of with care. If papers contain confidential or sensitive information they must be placed in the confidential bins for secure collection or shredded before disposing of them. Particular care must be taken when selecting papers to be placed in a recycling bin. Secure shredding off site is also made available.

Computers and hardware to be disposed of must be completely 'cleaned' before disposal. It is not enough just to delete all the files.

It cannot be assumed that simply deleting a file will prevent it being recovered from electronic media. Electronic memory containing personal information or sensitive personal information must be electronically scrubbed or physically destroyed.

Where a third party contractor holds personal information on behalf of the College, for example a payroll provider, the College will seek reassurance from the contractor regarding their data protection policies and procedures.


8. Subject Access Requests

Requests from parents or pupils for access to personal data or educational records will be dealt with as described in the Privacy Notice for Pupils and their Parents and Guardians.

College staff may have access to their personal data within one month of a request and at no charge (see section 7 above).

The Bursar will maintain a documented record of all requests for personal information with details of who dealt with the request, what information was provided and when, and any outcomes. The record will be used if there is a subsequent complaint in relation to the request.

If the College receives a written request from a data subject to see any or all personal data that the College holds about them this will be treated as a legitimate Subject Access Request and the College will respond within the statutory one month deadline.

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

Informal requests to view or have copies of personal data will be dealt with wherever possible at a mutually convenient time but, in the event of any disagreement over this, the person requesting the data will be instructed to make their application in writing and The College will comply with its duty to respond within the one month time limit.

9. Sharing Personal Information

The College only shares personal information with other organisations including Eton College (its education sponsor) where there is a legal requirement to do so or the organisation has been contracted by the College to carry out a function of the College.

The College is required, for example, to share information with the Department for Education and the Education Funding Agency. Under certain circumstances, such as child protection, we may also be required to share information with Children's Social Services or the police (*see also Child Protection Policy*).

Pupils' own right to access their own personal information held by the College will generally be exercised through their parents or guardians.

The Bursar will be responsible for authorising the sharing of data with another organisation. The principle, in authorising the sharing of data will take account of:

- whether it is lawful to share it;
- whether there is adequate security in place to protect the information while it is being transferred and then held by the other organisation;

Include in the **Privacy Notice** (see appendices) a simple explanation of with whom the information is being shared and why.

Considerations regarding the method of transferring data should include:


- If personal data is sent by e-mail then security will be threatened. You may need to check that the recipient's arrangements are secure enough before sending the message. The data may also need to be password protected and the password sent separately. You should also check that it is going to the correct e-mail address. Circular e-mails sent to parents should be sent bcc (blind carbon copy) so that the e-mail addresses are not disclosed to everyone.

If confidential personal data is provided by paper copy it is equally important to ensure that it reaches the intended recipient.

10. Websites

The College website will be used to provide important information for parents and pupils including our Privacy Notice (see appendices) and our Freedom of Information publication scheme (see below).

Where personal information, including images, are placed on the web site the following principles will apply:

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 9 th November 2023	Version No: v1.5

- We will not disclose personal information (including photos) on a web site without the consent of the pupil, parent, member of staff or Governor as appropriate;
- Comply with regulations regarding cookies and consent for their use;
- Our website design specifications will take account of the principles of data protection.

11. CCTV

Where the College uses Closed Circuit Television (CCTV) this will be notified to the Information Commissioners Office along with the purpose of capturing images using CCTV. The College appreciates that images captured on CCTV constitute personal information under the Data Protection Act.

12. Photographs

The College may use photographs of pupils or staff taken for inclusion in the printed prospectus or other school publications without further specific consent being sought.

Images recorded by parents using their own personal equipment of their child in a school play or activity for their own family use are not covered by data protection law.


All other uses by the College of photographic images are subject to data protection.

13. Processing by Others

The College remains responsible for the protection of data that is processed by another organisation on its behalf. As part of a contract of engagement other organisations that process data on behalf of the College will have to specify how they will ensure compliance with data protection law.

14. Training

The Bursar will ensure that all staff are adequately trained to understand their responsibilities in relation to this policy and procedures.

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4

FREEDOM OF INFORMATION POLICY

Overview

The Freedom of Information Act (FOI) 2000 came into full effect on 1 January 2005. From that date, all council services, schools and employees have new responsibilities.

The FOI creates a general right for any person to be told whether a public authority (including schools) holds information that they specify and, if so, to be given a copy of it within 20 working days. **Aims and Objectives**

In response to requests for information the College will:

- Give assistance
- Confirm whether the information is held and can be provided
- Supply the information, or give reasons for refusal
- Supply the information within 20 working days

Procedure

A full list of documents that are available by request from the College are listed in the publications scheme below.


Documents are retained for the appropriate periods stated in the retention guidelines for schools provided by the Records Management Society¹.

FREEDOM OF INFORMATION ACT PUBLICATION SCHEME FOR ACADEMIES²

This publication scheme is based on the model prepared and approved by the Information Commissioner and published on the gov.uk website on 30 April 2012. The College is a public authority. It is adopted without modification and will be valid until further notice.

¹ http://www.irms.org.uk/images/resources/infoguides/records_management_toolkit_for_schools_version_4_may_20_12.pdf
not a functional link

² *source:*
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/294923/Model_freedom_of_information_publication_scheme_for_academies_FINAL.pdf - *not a functional link*

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4

This publication scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the authority makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.

Classes of information Who we are and what we do

Organisational information, locations and contacts, constitutional and legal governance.

What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.


What our priorities are and how we are doing

Strategy and performance information, plans, assessments, inspections and reviews. **How we make decisions**

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Our policies and procedures

Current written protocols for delivering our functions and responsibilities. **Lists and registers**

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4

Information held in registers required by law and other lists and registers relating to the functions of the authority.

The Services we offer

Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

The method by which information published under this scheme will be made available

The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of a public authority, information will be provided on a website.

Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.


In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale. Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

Charges which may be made for Information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the authority for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4

Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- photocopying
- postage and packaging
- the costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.


Written requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act. Please contact info@holyporthcollege.org.uk or telephone 01628 640 150


The method by which information published under this scheme will be made available

The publication scheme is complied with using the table below, which identifies the information meeting the requirements of the Information Commissioner.

Information to be published	How the information can be obtained	Charge
Who we are and what we do (Organisational information, structures, locations and contacts) <i>This will be current information only</i>	hard copy and/ or website	

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4


Academy Funding Agreement – a link to the document on the Department for Education’s website	Holyport College Funding Agreement	
Academy Order (if applicable)		
School staff and structure – names of key personnel	College website: http://www.holyportcollege.org.uk/about-us/our-staff/	
School staff and structure – DBS details	Shared with Eton College as appropriate	
Governing body – names and contact details of the governors and the basis of their appointment	College website http://www.holyportcollege.org.uk/aboutus/governors/	
School session times, term dates and holidays	College website	
Location and contact information – address, telephone number and website	College website	
Contact details for the Principal and the Governing Body	College website	
College Prospectus	College website	
College Session times and term dates	College website	

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4


GCSE results – a link to the data on the Department for Education’s website		
What we spend and how we spend it (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit) This should be a minimum of current and the previous two years financial years (accounts that have been filed with the Charity Commission and Companies House).	hard copy and/ or website	

Annual budget plan and financial statements	Financial Accounts (on College website)	
Capital funding – details of capital funding allocated to the school along with information on related building projects and other capital projects	Financial Accounts (on College website)	


Additional funding – Income generation schemes and other sources of funding.	Financial Accounts (on College website)	
Procurement and contracts – details of procedures used for the acquisition of goods and services. Details of contracts that have gone through a formal tendering process.	Details in governor minutes	
Staffing and grading structure	See Pay Policy	
Pay policy – a statement of the Academy’s policy on procedures regarding teachers’ pay.	On request from the Bursar	

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4

Governors' allowances – Details of allowances and expenses that can be claimed or incurred.	• Done. Pending pub	
What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews) <i>Current information should be published.</i>	hard copy and/ or website	
School profile	On website	
Government supplied performance data	Pending. Not yet available	
OFSTED report – summary and full report	On website (updated after any visit)	
Performance management information	• On file at College	
Academy's future plans – any major proposals on safeguarding and promoting the welfare of children.	Refer to Governors' minutes	
Child protection – policies and procedures on safeguarding and promoting the welfare of children.	On website	
How we make decisions (Decision making processes and records of decisions) <i>Current and previous three years as a minimum</i>	Refer to Governors' minutes	
Admissions policy - arrangements and procedures and right of appeal – include information on application numbers and number of successful applicants by each oversubscription criteria.	On website	
Governing body meeting agendas, papers and minutes – information that is properly considered to be private should be excluded.	Available to view at the College	

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4


Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities) <i>Current information only</i>	hard copy, central College system and/ or website	
School policies including: <ol style="list-style-type: none"> 1. Charging and remissions policy 2. Health and Safety and risk assessment 3. Complaints procedure 4. Staff conduct policy 5. Discipline and grievance policies 6. Pay policy 7. Staffing structure implementation plan 8. Information request handling policy 9. Staff recruitment policies 	<ol style="list-style-type: none"> 1. On website 2. On request from the Bursar 3. On website 4. On request from the Bursar 5. On file at College 6. On request from the Bursar 7. On request from the Bursar 8. On website 9. See CP policy 	
Pupil and curriculum policies, including: <ol style="list-style-type: none"> 1. Home-school agreement 2. Curriculum 3. Sex education 4. Special education needs 5. Accessibility 6. Race equality 7. Collective worship 8. Careers education 9. Pupil discipline 	<ol style="list-style-type: none"> 1. Done. Pending pub ? 2. On website 3. On website 4. On website 5. w/in equality pol. 6. w/in equality pol. 7. Pending 8. Pending 9. See Behaviour pol. 	

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4


<ul style="list-style-type: none"> Records management and personal data policies Information security Records retention 	<ul style="list-style-type: none"> Done. Pending pub 	
<ul style="list-style-type: none"> Destruction and archive policies • Data Protection policies 	<ul style="list-style-type: none"> See above 	
<p>Equality and diversity</p> <p>(Policies, schemes, statements, procedures and guidelines relating to equal opportunities)</p>	<ul style="list-style-type: none"> On website 	

<p>Policies and procedures for the recruitment of staff</p> <p><i>– details of vacancies should be included</i></p>		
<p>Charging regimes and policies</p> <p>This should include details of any statutory charging regimes. Charging policies should include details of charges made for information routinely published. They should clearly state what costs are to be recovered, the basis on which they are made and how they are calculated.</p>	<ul style="list-style-type: none"> On website 	
<p>Lists and Registers</p> <p>Currently maintained lists and registers only</p>	<p>(hard copy and/ or website; some information may only be available for inspection)</p>	
Curriculum circulars and statutory instruments		

Disclosure logs	available for inspection	
Asset register	available for inspection	
Any information the Academy is currently legally required to hold in publicly available registers	available for inspection	

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 10 th November 2022	Version No: v1.4

The services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) <i>Current information only</i>	(hard copy and/ or website; some information may only be available for inspection)	
Extra-curricular activities	On website	
Out of school clubs	On website	
School publications	hard copy and/ or website	
Services for which the Academy is entitled to recover a fee, together with those fees	Community usage. See policy.	
Leaflets, booklets and newsletters	hard copy and/ or website	

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 19 th March 2015	Version No: v1.2

PRIVACY NOTICES Appendix I: Privacy Notice for Pupils and their Parents and Guardians

Privacy Notice - Data Protection Act 2018 Why do we collect information?

Holyport College is a data controller for the purposes of the Data Protection Act. We collect information from you and may receive information about you from your previous school. We hold this personal data and use it to:

- Support each pupil's learning;
- Monitor and report on each pupil's progress;
- Provide appropriate pastoral care and other support to each of our pupils; and ☐ Assess how well each pupil is doing and report on that to the parents. **What type of information do we collect?**

The information will include: personal data such as name and date of birth as well as contact details; educational performance assessments; attendance information; pastoral information. It will also include sensitive personal data such as: ethnicity; special educational needs; behavioural incidents; and medical information that will help us to support each pupil's education and wider welfare needs at the College. We will also hold personal contact information about parents and carers so that we can get hold of you routinely or in an emergency.


Where CCTV is used by the College this will only be for general security purposes in order to protect the pupils and staff of the College.

Pupil photographs may be included, as part of their personal data and this will be treated with the same level of confidentiality as all other personal data. Photographic images of pupils used in publically available media such as web sites, newsletters or the school prospectus will not identify pupils unless parental permission has been given in advance.

For a young person aged 13 years or over, we are required, by law, to pass on pupil information to the RBWM Youth Support Service to enable them to provide appropriate support. We provide pupils name and the current address of where the pupil lives, date of birth and any further information relevant to the service. The parent or young person (if over 16 years) can request that **only** their child's name, address and date of birth be passed onto the Youth Support Service by contacting the School Office.

Can we see the personal data that you hold about our child?

All pupils have a right to have a copy of the personal information held about them. A request for a copy of the personal information has to be made by a parent or guardian in writing. The only circumstances under which the information would be withheld would be if there was a child protection risk, specifically:

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 19 th March 2015	Version No: v1.2

- The information might cause serious harm to the physical or mental health of the pupil or another individual;
- Where disclosure would reveal a child is at risk of abuse;
- Information contained in adoption or parental order records;
- Information given to a court in proceedings under the Magistrate's Courts

(Children and Young Persons) Rules 1992; and copies of examination scripts

If you want a printed copy of the personal data then the College will charge the actual cost of providing the copy up to a maximum of a £10 charge. To protect each child's right of confidentiality under law the College reserves the right to check the identity of a person making a request for information on a child's behalf. Once any identity check has been completed and any fee due paid, the information will be collected and provided within 20 calendar days for a FOI and one month for a SAR.

Can we see our child's educational record?

All parents are also entitled to a copy of their child's educational record. A request must be made in writing to the Governing Board. The Educational Record includes curriculum, assessment, pastoral and behavioural information that is stored by the College. Only information that has come from a teacher or employee of the College Trust or an educational professional contracted by the Trust can be considered to form part of the educational record.


The College will charge a fee to provide an actual copy of the educational record but this will not be greater than the actual cost of reproducing the information. Once any fee has been received the College will respond to the request within 15 College days (21 calendar days excluding any public or College holidays).

Do we share this information with anyone else?

We do not share any of this data with any other organisation without your permission except where the law requires it and our rules allow us to.

We are required to provide pupil data to central government through the Department for Education (DfE www.education.gov.uk) and the Education Funding Agency (EFA www.education.gov.uk/efa). In turn, this will be available for the use(s) of the Local Authority. Where it is necessary to protect a child, the College will also share data with the Local Authority Children's Social Services and/or the Police.

If you want to see a copy of the information about you that we hold and/or share, please contact the Bursar.

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 19 th March 2015	Version No: v1.2

If you require more information about how the Local Authority (LA) and/or DfE store and use your information, then please go to the following websites:

<http://www.education.gov.uk/researchandstatistics/datatdatam/b00212337/datause>

If you are unable to access these websites we can send you a copy of this information. Please contact the DfE as follows:

Public Communications Unit

Department for Education

Sanctuary Buildings

Great Smith Street

London

SW1P 3BT

Website: <http://www.education.gov.uk>

Email: <http://www.education.gov.uk/help/contactus>

Telephone: 0370 000 2288

Appendix II: School Workforce: those employed or otherwise engaged to work at a school or the Local Authority

Privacy Notice - Data Protection Act 2018


Holyport College is the Data Controller for the purposes of the Data Protection Act.

Personal data is held by the school about those employed or otherwise engaged to work at the school. This is to assist in the smooth running of the school and/or enable individuals to be paid. The collection of this information will benefit both national and local users by:

- Improving the management of school workforce data across the sector;
- Enabling a comprehensive picture of the workforce and how it is deployed to be built up;
- Informing the development of recruitment and retention policies;
- Allowing better financial modeling and planning;
- Enabling ethnicity and disability monitoring; and
- Supporting the work of the School Teacher Review Body and the School Support Staff Negotiating Body.

This personal data includes some or all of the following - identifiers such as name and National Insurance Number and characteristics such as ethnic group; employment contract and remuneration details, qualifications and absence information.

We will not give information about you to anyone outside the school or Local Authority (LA) without your consent unless the law and our rules allow us to. We are required by law to pass on some of this data to:

 HOLYPORT COLLEGE	Data, Information and Records Policy	
	Effective Date: 19 th March 2015	Version No: v1.2

- the Department for Education (DfE)

If you require more information about how the DfE store and use this data please go to the following website:

- <http://www.education.gov.uk/schools/adminandfinance/schooladmin/a0077/963/what-the-department-does-with-school-workforce-data>

If you are unable to access this website, please contact the DfE as follows:

Public Communications Unit Department for
Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Website: <http://www.education.gov.uk>
Email: <http://www.education.gov.uk/help/contactus>
Telephone: 0370 000 2288