



Data Policies and Procedures

Equality Statement

Centre Academy East Anglia is committed to a policy of equality and aims to ensure that no employee, job applicant, pupil or other member of the school community is treated less favourably on grounds of sex, race, colour, ethnic or national origin, marital status, age, sexual orientation, disability or religious belief. We provide a safe, supportive and welcoming environment

CAEA recognises The General Data Protection Regulation (GDPR) and the application date of 25 May 2018 and is actively working towards compliance with that directive.

To be reviewed annually

Next review date: May 2019

Signed:

Principal and CEO

A handwritten signature in black ink, appearing to read 'D. Rollo'.

Dr Rollo

Date: 24/05/18

Signed:

Head of School

A handwritten signature in black ink, appearing to read 'K. Salthouse'.

Mrs Salthouse

Date: 24/05/18

Centre Academy East Anglia is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment.

1. Introduction

Centre Academy East Anglia (CAEA) takes its responsibility as a Data Controller seriously and recognises that the personal data it holds on those connected to the School needs to be safeguarded. All staff, including the Senior Management Team (SMT), paid staff, volunteers, agency staff or anyone working on behalf of the School has a responsibility to safeguard its information. This document contains the following individual policy documents related to the protection and processing of data:

- Clean Desk/Clear Screen Policy
- Photography, Video and CCTV Policy

It should be read in conjunction with the following additional policies and procedures:

- Privacy Notice (Data Protection Policy)
- E-Safety (Online Safeguarding) Policy
- Data Protection – Practical Document for Staff
- Data Protection – Data Breach Policy
- Freedom of Information Act Policy

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2. Clean Desk/Clear Screen Policy

2.1 Introduction

CAEA recognises that paper records which are left unsupervised on desks and workstations, especially for long periods, are at risk of theft, unauthorised disclosure and damage. The School also realises that there are similar security risks associated with electronic records where computer screens are left unattended.

This policy sets out how CAEA will reduce these risks through the implementation of a Clean Desk/Clear Screen policy. This policy relates to any documents, data or information that is kept in any format, including paper or electronic documents, emails, visual images, audio and video files, CDs and DVDs, Memory sticks and portable hard drives, databases or spreadsheets

2.2 Roles and Responsibilities

2.2.1 All Staff

It is important that all staff understand the importance of information held by the School as well as its legal position to safeguard personal data. All staff share this responsibility and must ensure the information they hold is adequately protected. This includes minimising the risks associated with information being left on desks, on screens, in offices, workspaces and classrooms.

For the purposes of this policy, the term staff includes the Senior Management Team (SMT), paid staff, volunteers, agency staff or anyone working on behalf of the School whether temporarily or permanently.

2.2.2 Administration Staff

As well as their individual responsibilities to protect the data in their own work areas, the administration team also have the responsibility to ensure that the risk associated with data displayed in common areas is minimised. Personal Information that needs to be readily accessible for staff in the Staff Room or School Office should be covered with an additional sheet in order to prevent it being visible from doorways or by visitors.

2.2.3 Senior Management Team

The SMT has access to the most sensitive data held in the school, therefore it is important that they are especially vigilant about adherence to the Clean Desk/Clear Screen Policy.

In addition to this individual responsibility, SMT members also have the responsibility to ensure that the policy is being upheld in and around the school.

2.3 Clean Desk Procedure

Confidential or sensitive personal data must be locked away when not in use and never left unattended. Ideally, all staff should leave their desk paper free at the end of the day.

All portable computing and data storage devices should be placed out of sight, preferably being locked away at the end of the working day.

2.3.1 Printing personal data

Staff should ensure that they print documents containing confidential or sensitive personal data to a printer located in their immediate vicinity or should print securely to the main printer in the School Office.

2.3.2 Disposing of personal data

Staff should ensure that documents containing personal data are disposed of securely, either by personally shredding the document (Shredding machine located in the school office). Documents containing confidential data or sensitive information should not be put in the general waste bins.

2.4 Clear Screen Procedure

All staff should lock their computer screen when leaving their place of work unattended. If they are using a shared computer, or anticipating being absent for 30 minutes or more, they should log off (or shut down) rather than lock their computer.

2.4.1 How to lock your screen

Locking a computer screen is done through pressing CTRL+ALT+DEL and then selecting 'Lock this computer'. It can also be done by pressing the Windows Key+L.

2.4.2 Screen position

All staff should be aware of the position of their screen, wherever possible, to ensure that it cannot be seen by unauthorised people while in use.

If staff attach their computer to a projector they should extend rather than duplicate their display. This will avoid documents being inadvertently shared with students and prevent emails from being visible should they arrive during lessons. If individual members of staff are not able to change these settings for themselves, they should ask the ICT teacher to help.

Teachers should ensure that student screens are positioned so that they are aware of student activity during classes.

3. Photography, Video and CCTV Policy

3.1 Introduction

As part of CAEA activities, the School may take photographs or record images of individuals within the School. This includes images of students, staff and visitors on School premises as well as on school visits and trips. CAEA's purpose and lawful basis for collecting these images are set out in detail in the School's Privacy Notice (Data Protection Policy).

CAEA recognises the need to have appropriate safeguards in place to ensure that both still and video images are appropriately managed. The priority will always be to ensure that the safety of students is not endangered either directly, or indirectly, by the use of photography. This policy will set out how the School will ensure the risk around use of student images is minimised. It will also set out how staff and students can reduce their own risk with regards to the taking and sharing of images.

3.2 Processing Images with Consent

We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. For current students we will do this routinely. **For new students consent is sought within the admissions pack.** However, consent can be given or withdrawn by an individual at any stage by notifying the School Office.

We will seek consent from parents for images to be used in each of the following ways:

3.2.1 On School premises

Consent will give permission for the School to take videos and photographs both in School and at School events for in-school use, for instance on notice board displays within School premises.

3.2.2 In School publications

Consent will give permission for the School to use photographs in publications created in-school such as newsletters, magazines and brochures.

3.2.3 Annual School photos

Consent will give permission for students to have an annual School photo. This will involve a third-party photography company taking individual, class and whole school photos. Photographs will be available for parental purchase once these have been taken.

3.2.4 In External Publications

Consent will give permission for photographs and video to be taken used by external agencies such as newspapers, external suppliers or other third parties. Parents should be aware that withholding consent for photographs or videos to be taken for external publications may mean students are not eligible to go on certain trips or activities. For instance, students would not be able to attend events unless permission is given for their televised recording.

3.2.5 Online on the School Website

Consent will give permission for the school to use photographs and videos taken on the school website. When using photographs and videos online, we will not accompany them with any other personal information about the student, including the student's name.

3.2.6 Online on School Social Media pages

Consent will give permission for the School to use photographs and videos taken on the School's social media sites. When using photographs and videos online, we will not accompany them with any other personal information about the student, including the student's name.

Consent can be refused or withdrawn for any photo or video at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

3.3 Processing Images without Consent

Where possible, consent will be sought to take, keep and process images, however, where collection of images form part of CAEA's public tasks and legal obligations the school will process images even without consent. There are numerous reasons why the taking of photographs or videos may be necessary, some examples would be videos of performances for external exam moderation, CCTV images to help manage the security and safety of the school or recordings of Speech and Language sessions to help student meet their therapy targets.

3.4 Use of Photographs and Videos

The use of images, including those of students or staff, has significant benefits to learning however, staff and students need to be aware of the risk associated with sharing images and especially when uploading images to the internet. Images uploaded may be available forever and so have the potential to cause both short and long-term harm and embarrassment.

Staff should therefore be aware of the risk to their, and the school's, professional reputation before posting images online. More information about this can be found in the Staff Handbook. Students will also be informed of the potential risks associated with digital images as part of their curriculum.

3.5 Images taken by Staff

With regards to images taken at school by staff, the following procedures should be followed:

- Staff are allowed to take digital/video images, using school equipment, to support educational aims, but must follow School Policies concerning the sharing, distribution and publication of those images. Where images are taken for reasons such that consent is required, images should not be taken without consent.
- Should staff need to use their own equipment to take photos or videos, then prior written permission from the Head of School is needed on each occasion the equipment is to be used. Images should be uploaded onto school platforms as soon as practically possible and then images removed from personal equipment.
- Care should be taken when taking digital and video images that students are appropriately dressed and are not participating in activities that might bring the individuals or school into disrepute. Likewise, staff must not use any images that are likely to cause distress, upset or embarrassment.
- Staff are permitted to take personal photographs at school events to which parents have been invited, provided that they follow the procedures under section 3.7 of this policy.

3.6 Images taken by Students

With regards to images taken at school by students, the following procedures should be followed:

- Students must not take, use, share, publish or distribute images of others taken in School or on School trips without their permission.
- Students must not upload any photographs taken within the school premises onto the internet or any social media sites.

3.7 Images taken by Parents or Families

CAEA understands that photographs taken at school events are an important record for students and their families. Families are therefore permitted to take photographs and record videos at school events to which they have been invited as long as this does not upset the performance, event, or health and safety of pupils, staff or visitors.

Videos or images taken by visitors at school events should be for personal use only and they should not be uploaded to any website or social media site. We ask for care to be taken when photographing to avoid taking images that are likely to cause distress, upset or embarrassment. Where parents or families have inadvertently taken photographs that may cause distress, upset or embarrassment to anyone in the picture, CAEA asks that these are deleted.

Parents volunteering in school or on school trips are not permitted to use personal equipment to take photographs or videos of students. In these situations, they should adhere to the procedures set out in section 4.6 of this policy.

3.8 CCTV

CAEA uses Closed Circuit Television (CCTV) in some areas of school property as a security measure. Cameras will only be used in appropriate areas and are clearly visible. The school will comply with requests from law enforcement agencies who wish to view images for the purpose of prevention and detection of crime.