



Walthamstow Hall

DATA PROTECTION POLICY FOR EMPLOYEES

The School is registered under the Data Protection Act.

Note: The DPA will be replaced by the General Data Protection Regulations (GDPR) in May 2018; this Policy will be updated prior to 25 May 2018.

General Statement of the School's Duties

The School is required to process relevant personal data regarding employees as part of its operation and shall take reasonable steps to do so in accordance with this policy.

Data Protection Controller

The School has appointed the Bursar as the Data Protection Controller (DPC) who will endeavour to ensure that all personal data is processed in compliance with this policy and the Principles of the Data Protection Act 1998.

The Principles

The School shall so far as is reasonably practicable comply with the Data Protection Principles (the Principles) contained in the Data Protection Act to ensure all data is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred without adequate protection

Personal Data

Personal data covers both facts and opinions about an individual. It includes information necessary for employment such as the employee's name and address and details of payment of salary.

Processing of Personal Data

An employee's consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt will remain confidential and will only be disclosed to third parties with the consent of the employee.

Sensitive Personal Data

Walthamstow Hall may, from time to time, be required to process sensitive personal data regarding an employee. Sensitive personal data includes medical information and data relating to religion, race, trade union membership and criminal records and proceedings. Where sensitive personal data is processed by the School the employee concerned will be made aware that this is the case and given the opportunity to give or withhold consent.

Rights of Access to Information

Employees have the right of access to information held by Walthamstow Hall, subject to the provisions of the Data Protection Act 1998. Any employee wishing to access their personal data should put their request in writing to the DPC. The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within 40 days of access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the worker as soon as is reasonably possible after it has come to the School's attention.

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.

Accuracy

The School will endeavour to ensure that all personal data held in relation to staff is accurate. Employees must notify the DPC of any changes to information held about them. An employee has the right to request inaccurate information about them is erased.

Enforcement

If a worker believes that the School has not complied with this policy or acted otherwise than in accordance with the Data Protection Act, the employee should follow the School grievance procedure and also notify the DPC.

This policy has regard to the guidance issued by the Secretary of State.

Walthamstow Hall policies are approved, ratified and reviewed regularly by the Governing Body in the light of statutory requirements.

Reviewed June 2017
Next Review Date May 2018

Signed: Date:

Mrs J Adams
Chair of Governors