

## SMMIS Data Protection Policy

### Data Protection Policy

#### 1. Introduction

1.1. SMMIS is committed to the eight principles of the Data Protection:

- Personal data shall be processed fairly and lawfully
- Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
- Personal data shall be adequate, relevant and not excessive
- Personal data shall be accurate and, where necessary, kept up to date
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
- Personal data shall be processed in accordance with the rights of data subjects under this Act
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
- Personal data shall not be transferred to a country or territory outside of Singapore unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

This statement represents the response of the Trustees to its duties under the Data Protection Law. Data Protection Law covers staff, pupils, parents and any other individuals for which the school holds personal details.

#### 2. Our Commitment

2.1. Aims:

- SMMIS will implement the requirements of the Data Protection Act 1998 and any subsequent amendments or regulations on protecting data and the school's controls and procedures will ensure integrity and security of data
- SMMIS will maintain a Data Protection Register, and ensure that all personal data obtained, held, used or disclosed, conforms to the details recorded within that registration

2.2. In addition, SMMIS will ensure that:

- Staff are aware of their responsibilities under the Data Protection Law
- Staff are trained and supported to deal effectively with the requirements of the Law, including the need to deal with subject access requests, in whole or in part, in accordance with the Law
- The requirements of the Law are considered in decision-making processes, such as the development of the policy and procedures and the design and the implementation of information systems
- The operations of the organisation are developed to meet the highest standards of openness and accountability

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### **3. Responsibility for complying with the Data Protection Law**

The Principal has ultimate responsibility in ensuring that the school complies with this act however everyone within the school has a responsibility to ensure that they abide by the principles listed above in handling personal data. Staff are responsible for ensuring that any personal data held is only shared with other members of school staff or authorities who are entitled to have access to this data. If staff are unsure they must raise any queries or concerns with a manager/ the Principal immediately. Staff also have a responsibility to ensure that the details held about them are accurate and kept up to date for example ensuring that the school is notified if they move house.

### **4. Individual Rights**

All individuals (including staff) have a right under the DPA to ask for a copy of the information held about them on computer and in some manual filing systems. Requests for access to personal data should be referred to the Principal who will deal with it promptly and within a maximum of 40 days from receiving the request. A charge of up to £10 can be made for responding to a request which will be at the discretion of the Principal.

The School will only monitor individual staff when there are concerns about the individual's use of e-mail, internet, telephone or other data that the member of staff may be using inappropriately. If monitoring is used for training purposes the individual will be made aware of this at the time.

### **5. Miscellaneous**

CCTV within the school will only be in public areas, will not intrude on anyone's privacy and be used for security purposes. Notices will be placed in the school to ensure that all visitors and staff are aware of this.

The School will also ensure that any service providers used that will handle personal data for example HR, Payroll comply with the DPA. Any member of staff found to mishandle data or share personal data with unauthorised individuals will be subject to investigation under the School's Disciplinary Policy. Deliberate, malicious or reckless breaking of the DPA will be counted as gross misconduct and could result in dismissal.

Under this Act staff can also be criminally liable if you knowingly or recklessly disclose personal information in breach of the policy. If there are any queries concerning this policy or you require further assistance or training please contact the Principal or your manager.

### **6. Monitoring, Evaluation and Review**

The Governing Body will review this policy annually and assess its implementation and effectiveness. The policy will be promoted and implemented throughout the school.

**Prepared by:** Elaine Robinson

**Created on:** August 2017

**Ratified by Trustees:** October 2017

**Reviewed by:** August 2019