

BEST Procedure for Processing Personal Data Relating to Staff



This procedure should be read in conjunction with the Data Protection Policy and the Beds Borough Data Protection Guidance (Chapter 3, Section 21 of Schools Personnel Handbook, dated January 2014).

Personal data is information which relates to an identifiable living individual that is processed as data. Processing means collecting, using, disclosing, retaining or disposing of information. The data protection principles apply to all information held electronically or in structured files that tells you something about an identifiable living individual.

Data must:

- be processed fairly and lawfully
- be obtained only for lawful purposes and not further used in any manner incompatible with those original purposes
- be accurate, and where necessary, kept up to date
- be adequate, relevant and not excessive in relation to the purposes for which it is processed
- not be kept for longer than is necessary for those purposes
- be processed in accordance with the rights and data subjects under the Data Protection Act
- be protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
- not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

BEST require each academy to ensure that adequate controls are in place with regard to access to personal information giving access only to people (staff and governors) who need particular information to do their jobs and only when they need it. The guidelines below should be followed for access to personal information relating to staff.

Storage/security of data

All personnel data should be securely stored whether electronic or paper copy.

Academies must give adequate consideration to the physical security of, and restriction of access to, confidential personal information. Consideration must also be given to the security of the building and storage systems, and access to them, preventing as far as is possible the risk of vandalism and theft.

All portable electronic devices should be kept as securely as possible and adequate steps taken to protect any personal data held electronically i.e. password protected or encrypted. Particular care must be taken when using laptops and USB devices which hold confidential personal information. These items must be securely stored when not in use.

Any data in paper format must also be stored securely. Where possible, storage rooms, strong cabinets and other storage systems **with locks** should be used to store paper records. Paper containing confidential personal information should not be left on desks, noticeboards or where there is general access.

Viewing or removal of data

Personal information relating to staff should not be removed from academy premises, electronically or in paper format, unless there is an exceptional circumstance, and express permission should be sort from the Principal.

Each BEST academy holds a log of who has requested and accessed personal information relating to staff. This log records the following information:

- Date of request
- Name of person requesting the information
- Name of who approved the request and date
- Date the information was viewed
- If a personnel file has been requested, the name and date of who logged this file back in should be recorded

HR Assistants in each academy are not required to log any activity that occurs during their day to day duties. However, if a personnel file is removed from storage, this activity should be logged.

If HR Assistants require information from another BEST academy, the authorisation process below should be followed.

Payroll information is managed by the Finance Team. Access to the payroll information by the Finance Team during their day to day activities does not need to be logged. However, if payroll information is removed from site, the authorisation process below should be followed.

BEST's HR Manager has authority to view files from all BEST academies. However, the Academy Principal should be informed if these files are to be removed from site.

Access to files locally (in each BEST academy) is restricted to the HR Assistant, Principal and Senior Leadership Team. However, a justifiable reason for access should be logged.

Hierarchy of approval:

Personal information relating to	Authorisation to be sought from
BEST staff	Academy Principal or Head of School /HR Manager
Academy Principals	Executive Leader or HR Manager
Executive Leaders	Chair or Vice Chair of BEST Board of Directors or HR Manager

Directors of BEST can request personal information relating to staff via the Academy Principal, Head of School or HR Manager but this must be for a specific reason. This activity must be logged.

In the event that personal information relating to the Executive Leader is required, this can only be viewed by the Chair or Vice Chair of BEST Board of Directors or HR Manager. This activity must be logged.

Any Governor that feels they have sufficient reason to view or remove any personal information relating to staff must make a request for access to the file(s) via the Directors of BEST. In this circumstance there must be a specific reason, the Academy Principal must be notified and the request/access must be logged as per the above procedure.

Disposal of personal information

The Data Protection Act 1998 does not give any specific guidance on how to dispose of personal data. BEST academies will always dispose of data in a way that creates little risk of an unauthorised third party using it to the data subject's detriment. If any confidential information is to be destroyed and is held on paper records, it should be shredded and electronic memories should be scrubbed clean or destroyed.

Author and Date

Drafted by L. Little, approved by Academy Principals/HR Manager – Sept 2015