



INNOVATIVE SCHOOL ADMINISTRATION

Data Safeguarding Policy (UK & Ireland)

September 2014

1. Introduction

This document sets out the policy of School Thing Ltd and its subsidiaries (“the Company”) with regard to data safeguarding, which is in addition to its Data Protection Policy. The Company views the correct and lawful handling of personal and sensitive data as key to its success and dealings with schools. The Company shall ensure that it handles all data correctly and lawfully, within a safe and secure environment.

2. Definitions

Company – means School Thing Ltd. and School Thing UK Ltd. Registered in Ireland, England and Wales respectively. Trading as VSware and VS School MIS.

Customer – means all clients of the Company, normally schools.

Employees – means all members of staff or volunteers appointed by the Company

Data – means all electronic records, personal or otherwise, relating to the Customer and its learners, staff and stakeholders

3. Safer Recruiting

Safer recruitment is an important part of making sure someone is suitable for the role they are undertaking.

The Company will ensure that all the relevant safeguarding, recruitment and barring checks have been undertaken for all Employees and keep appropriate training records on a centralised register.

These checks may include:

- Face-to-face interviews
- Checking self-declaration forms for relevancy to the role
- Undertaking criminal record and vetting checks
- Undertaking barred list checks
- Checking references before confirming appointment
- A probationary and supervision period for new employees
- Conducting personal development reviews
- Monitoring conduct in the role
- Conducting in-role risk assessments

The Company will undertake DBS (formerly known as CRB) checks for all UK Employees and Garda Vetting for all Irish Employees, in addition to any equivalent international checks where required. Contractors or agencies appointed will also be required to meet any EU and local legislation or directives where required to do so.

4. Training

As a minimum, training will always include an explanation of the Company’s Data Safeguarding Policy including the context and implementation; this will usually be carried out during Employee induction

Training for all Employees will cover:

- being aware of the importance, and their responsibility, in upholding and maintaining the Data Safeguarding and Data Protection policies of the Company
- being aware of how to report concerns when concerned about the behaviour of a colleague/Employee;
- understanding and being able to implement safe working practices for Employees;
- knowing who in the Company has Data Safeguarding lead responsibility.

5. Customer obligations

The Customer is required to register with the Information Commissioners Office (ICO) as a 'Data Controller' or equivalent as required by their Local Government and have implemented their own relevant policies and procedures to ensure they comply with appropriate legislative and best practice guidelines. In turn, the Customer should also ensure such guidance is adhered to by their suppliers and any external organisations that have been granted access to their Data, for which a Data Sharing Agreement or equivalent should be established between the two.

6. Data Security and Protection

The Company and its suppliers will be acting as 'Data Processors' as defined by the Data Protection Act 1998 (UK) and Data Protection Act (Amended) 2003 (Ireland). The Company has taken all reasonable measures to ensure the safety and security of personal information and continues to review these measures on an on-going basis.

All data is stored, processed and transmitted securely, using encryption where necessary, adhering to current EU Data Protection Directives. The Company also operates appropriate fail-safe and disaster recovery procedures to minimise any data loss and/or disruption to services.

7. Contact

If you have any comments or concerns in regard to this policy, you can contact the Company using the details provided at www.vsware.co.uk or by emailing info@vsware.co.uk

This Policy has been approved & authorised by:

Name: Patrick Barry
Position: Managing Director, UK & Ireland
Date: 4th September 2014
Signature: 