

DATA PROTECTION ACT 1998

A BASIC GUIDE OF THE IMPACT UPON EDUCATIONAL ESTABLISHMENTS

INTRODUCTION

East Dunbartonshire Council and its schools need to collect personal data on individuals in order to undertake its functions and responsibilities. However, whenever personal data is collected and used, people's lives can be adversely affected if something goes wrong. For example, the accidental or unauthorised disclosure of a child's personal data can place that child at risk. When details are not entered into databases correctly people can be unjustly refused benefits, housing, or even a job. If data is not kept securely, people's privacy can be affected.

It is vital that when the Council collects, processes, stores and destroys personal data it maintains the confidence of those who are asked to provide it by complying with the requirements of the Data Protection Act 1998

THE DATA PROTECTION ACT IN PRACTICE

The Data Protection Act applies to 'personal data' i.e. data about identifiable living individuals (the 'data subject'). Those who decide how and why personal data is processed (the 'data controller') must comply with the rules of good information handling, known as the data protection principles, and the other requirements of the Data Protection Act.

THIS GUIDANCE

The purpose of this guidance is to give schools help in the practical application of the Data Protection Act to certain scenarios that are likely to occur regularly. Further help and advice on specific issues is also available from the:

Freedom of Information/Data Protection Officer
Broomhill Industrial Estate
Kirkintilloch
Glasgow
G66 1TF
Tel: 0141 775 4571 Email: foi@eastdunbarton.gov.uk

GENERAL INFORMATION

The Rules of Good Information Handling - The Principles

Anyone processing personal data must comply with the eight enforceable principles of good practice. They say that data must be:

- fairly and lawfully processed
- processed for limited purposes and not in any manner incompatible with those purposes
- adequate, relevant and not excessive
- accurate
- not kept for longer than is necessary
- processed in line with the data subject's rights
- secure
- not transferred to countries without adequate protection

Personal data covers both facts and opinions about the individual. It also includes information regarding the intentions of the data controller towards the individual.

Processing Personal Data

'Processing' is broadly defined and takes place when any operation or set of operations is carried out on personal data. The Act requires that personal data be processed "fairly and lawfully". Personal data will not be considered to be processed fairly unless certain conditions are met. A data subject (the subject of the personal data) must be told the identity of the data controller (i.e. the Council) and why that information is or is to be processed.

Processing may only be carried out where **one** of the following conditions has been met:

- the individual has given his or her consent to the processing
- the processing is necessary for the performance of a contract with the individual
- the processing is required under a legal obligation
- the processing is necessary to protect the vital interests of the individual
- the processing is necessary to carry out public functions
- the processing is necessary in order to pursue the legitimate interests of the data controller or third parties (unless it could prejudice the interests of the individual)

Processing Sensitive Data

The Data Protection Act makes specific provision for sensitive personal data. The following only are defined as sensitive data: racial or ethnic origin; political opinions; religious or other beliefs; trade union membership; health; sexuality; criminal proceedings or convictions. Opinions are not sensitive data unless they relate directly to these specific types of data. Sensitive data can only be processed under strict conditions, which include:

- having the explicit consent of the individual
- being required by law to process the data for employment purposes
- needing to process the information in order to protect the vital interests of the data subject or another
- dealing with the administration of justice or legal proceedings

Data Protection Statements

When gathering information in order for this to be fair a data protection statement, sometimes called a fair processing statement, should be included in forms, letters and notices. This needs to state who is collecting the data and for what purpose the data will be used. It should also include information on who the data will be shared with and if appropriate an opt-out box to prevent direct marketing. Guidance on the construction of a statement is included in the Appendix I.

Electronic Files

The Data Protection 1998 continues the principles of the 1984 Act. It covers information held on computer, or held in anticipation that it will be recorded electronically and relates to identifiable individuals.

Paper Files

The Data Protection Act only covers certain paper records deemed to be held in a 'relevant filing system'. That is, a set of information in which the records are structured, either by reference to individuals or by reference to criteria relating to individuals, so that 'specific information relating to a particular individual is readily accessible'. An obvious example is personnel files filed by name or payroll number.

Pupil, housing, social services and health records are also covered by the Act which defines these as 'accessible records'.

The Freedom of Information (Scotland) Act 2002 has broadened the scope of the Data Protection Act. As well as the manual records already covered by the Data Protection Act explained above, an individual can ask for access to all other records containing their personal data. However, they must specify which records they wish to access.

Security

The Council and schools must take security measures to safeguard personal data. The 1998 Act requires that we must take appropriate technical or organisational measures to prevent the unauthorised or unlawful processing, or disclosure, of data. Where the Council contracts the processing of data to an external company, security arrangements must be part of a written agreement between the two.

Transfer of Personal Data Overseas

The eighth principle restricts the transfer of personal data outside the EEA (which consists of Norway, Iceland and Liechtenstein as well as the 25 EU Member States). Personal data may only be transferred outside of the EEA if those countries ensure an "adequate level of protection for the rights and freedoms of data subjects". This situation may arise where schools send email abroad or use webcams and create websites that include personal data.

The EU determines what is an adequate level of protection. However, you could send data to a single organisation if you could satisfy the Office of the Information Commissioner that the company has adequate levels of protection (evidenced in a contract to abide by Data Protection regulation, for example).

The Rights of Individuals

The right of subject access

The Data Protection Act allows individuals to find out what information is held about themselves on computer and some paper records. This is known as the right of subject access (see below for full details).

The right of rectification, blocking, erasure and destruction

The Data Protection Act allows individuals to apply to the Court to order a data controller to rectify, block, erase or destroy personal details if they are inaccurate or contain expressions of opinion which are based on inaccurate data.

The right to prevent processing

A data subject can ask a data controller to stop or request that they do not begin processing relating to him or her where it is causing, or is likely to cause, substantial unwarranted damage or substantial distress to themselves or anyone else. However, this right is not available in all cases and data controllers do not always have to comply with the request.

The right to prevent processing for direct marketing

A data subject can ask a data controller to stop or not to begin processing data relating to him or her for direct marketing purposes. This is an absolute right.

The right to compensation

A data subject can claim compensation from a data controller for damage or damage and distress caused by any breach of the Data Protection Act. Compensation for distress alone can only be claimed in limited circumstances.

Criminal Offences

Notification offences

These are committed where processing is being undertaken by a data controller who has not notified the Commissioner either of the processing being undertaken or of any changes that have been made to that processing. Failure to notify is a strict liability offence. Schools within East Dunbartonshire do not have to notify individually as they are covered by the Council's notification.

Procuring and selling offences

It is an offence to obtain, disclose, sell or advertise for sale, or bring about the disclosure of personal data, without the consent of the data controller. It is also an offence to access personal data or to disclose it without proper authorisation. This covers unauthorised access to and disclosure of personal data. There are some exceptions to this.

Enforced subject access offence

Unless one of the limited statutory exceptions apply, it is an offence for a person to ask another person to make a subject access request in order to obtain personal data about that person for specified purposes, such as a precondition to employment.

SCHOOL SPECIFIC ISSUES

Pupil or parent consent?

The rights that the Data Protection Act 1998 gives are not affected by age. In a small number of cases it may be that pupils are not capable of understanding their rights or of understanding the consequences of the processing of their personal data. In these cases, schools should provide the relevant information to parents and guardians and seek their consent.

Advice suggests that when a young person is old enough to make up their own mind, parental rights yield to individual rights. As a general rule in Scotland, the following can be considered:

Under 12 = Parental rights apply
Over 12 = Individual rights apply

If a child aged 12 or over is unable to show sufficient maturity and understanding then the parents will continue to be the ones from whom consent and/or permission should be sought.

Sample consent forms are included in the appendices.

Photograph and video (digital and analogue)

Photographs are only subject to the DPA when an individual is the main subject and focus of an image e.g. a child doing a school activity, a video of a child reciting a poem.

Photographs for internal use by the school

Permission should be sought at the beginning of each academic year from parents to allow for their child's image to be taken and used for internal purposes throughout that academic year (see Appendix II). A general statement of the purposes for which internal photographs are used should be included in the school handbook.

Photographs for publicity purposes

Permission should be sought at the beginning of each academic year from parents to allow their child's image to be used for school or Council publicity materials (see Appendix III). **Parents and pupils should be adequately informed as to how the image will be used, especially if it is being used for a sensitive or contentious reason e.g. a pupil posing for an anti-bullying poster may imply that the individual is a victim of bullying etc.**

Disposal of images

Photographs and video where an individual is the main focus of the captured image may be offered the image to keep at the end of the academic year. If they decline this offer the photograph or video should be destroyed, including photographic negatives and computer files, *or* kept by the school as a historical record.

Images of groups of individuals are not subject to the DPA, e.g. class photographs or photographs of school football teams. Images may be offered to any of the individuals in the image, retained by the school as historical records, or destroyed.

Images and video kept as historical records

Photographs and video subject to the Data Protection Act may be kept as historical records. Schools are strongly advised to transfer historical records to the professional care of the Council Archivist/Records Officer (contact Information & Archives at the William Patrick Library, Kirkintilloch). Access to such records will not normally be given to the public until the records are 75 years old. However, bona fide historical researchers may be granted access to such records under controlled conditions. For further information contact the Archivist.

School events

There are no DPA issues with parents taking photographs and video film at school events such as sports days and nativity plays. These are considered to be for domestic purposes and are therefore exempt from the DPA.

If the school wishes to photograph or film an event, and possibly sell the result, prior notice needs to be given to parents and students (for example on publicity material) and consent for images to be taken gained. If consent is not given then the child cannot be included in film/photograph.

Media/Press images

Permission should be sought at the beginning of each academic year from parents to allow their child's image to be used in an external publication or on television or film. Parents and pupils should be adequately informed as to how the images may be used.

The publication of a child's name when accompanied by their image can make a child vulnerable to individuals who wish to "groom" him/her for abuse. Best practice suggests 1 to 3 below:

1. If photographs of children are published, the name of the child should not be published.
2. Where it is deemed to be necessary to publish a child's name, this should not be supported by a photograph.
3. If there is a display of pupils' work to be shown at a public venue outside of the school, such as in a library or shopping centre, best practice suggests that the minimum pupil identification should accompany the work. For example, "by Paul, year 1" is less identifiable than "Paul McArthur, class 1a, year 1". It is advisable to display the least amount of personal information at a public venue.

Please note: a child's photograph along with his/her name can only be published/displayed if you have a signed consent form from the parent/carer giving their permission.

Websites

School websites are an important link to the community, and a means of promoting school activities and events. This however also means that information on the website has the capacity of being passed outside of the EEA and as such stringent rules apply. If a pupil's image is being used on any webpage this can only be used with the express

consent of the parent. Parents need to be fully informed of the use the photograph will be put to and the potential of the image being viewed world-wide.

Any consent form should be accompanied with a letter explaining the use to which pictures will be used, and an explanation of the global nature of the internet, for example:

“Images used on Internet sites have the capability of being viewed by any person with Internet access world wide. The School cannot control who will view the images or the countries in which the images may be accessible, this may include countries without adequate protection of personal data.”

Webcams

Many schools may take advantage of the use of webcams. If a school is, however, looking to use webcams to broadcast daily activities on a website, or outside of a secure network, the consent of parents should be obtained. The danger with such material is that it is broadcast globally with no control over the audience; hence it is recommended secure networked webcams only are used. Again if children are to be using webcams parental consent for this should be sought, this should ideally be sought at the start of the school year.

Staff Information

The rules of Data Protection apply equally to staff data as they do to pupil data. Any information stored about employees must be done with regard to the legislative requirements above. Staff have a right to view information held about them by the school.

Laptops, PDAs and portable electronic equipment

Any use by teachers of laptops to work on pupil information or other personal data outside of the school environment should be in accordance with the Corporate IT Security Policy and ICT Security Code of Practice (available on The Hub).

All portable equipment should be password protected – contact the IT helpdesk for advice. Only information needed should be taken off-site and should be transferred to the main Council IT network on its return and the portable equipment wiped of that data.

It is important to remember that any information taken away from the school site remains the responsibility of the Head Teacher.

Retention of Records

The Data Protection Act states that records should be kept for no longer than is necessary. A generic EDC School retention schedule is available within each school that states how long different types of records should be retained for taking into account legal obligation, evidential value, historical value and data protection considerations.

Notification to the Commissioner

There is no need for schools to notify themselves as Data Controllers to the UK Information Commissioner under the DPA. School notification is included in the Council's notification.

Some schools have received letters from companies telling them they are required to notify and on the payment of a fee the company will do this for them. Should you receive such a letter, please forward this to the Freedom of Information Officer who will, if appropriate, report the companies to trading standards.

ACCESS TO EDUCATION RECORDS

The Data Protection Act 1998 allows anyone, including children, the right of access to personal information held about them by any Data Controller (e.g. East Dunbartonshire Council, a bank, etc.) In order to exercise this right the individual needs to show that they are of suitable maturity to understand the process into which they are entering. In Scotland, a child aged 12 or over is felt to be suitably mature although there is no legal reason why a child under 12 should be refused access if they are able to demonstrate suitable maturity.

The Data Protection Act does not give parents a statutory right of access to any records relating to their children. However, if the data subject is unable to show suitable maturity or ability, for example a child is too young, a parent or guardian may make the application on their behalf.

Parents do have a statutory right of access to their child's education records provided by the Pupils' Educational Records (Scotland) Regulations 2003.¹ This guidance aims to provide advice on both pupil and parental rights of access to educational records.

The table below summarises the different rights of access available to pupils and parents dependant upon the age and abilities of the child:

Age of child	A Child's legal rights	A Parent's legal rights
Under 12	A child's parent or guardian may apply on the child's behalf for access to all records	Right of access to core education record (PPR)
12 and older	If able to show suitable maturity and understanding, the child may apply for access to all records.	Right of access to core education record (PPR) No legal right to all records unless acting as child's representative because child is unable to show suitably maturity or understanding

Definitions

For the purposes of this guidance the following definitions apply:

- Parent – includes guardians and any person liable to maintain or who has actual custody of a child or young person²
- Pupil – a person who receives, or has received, school education provided by the responsible body³

Education records

For the purposes of the Pupils' Educational Records (Scotland) Regulations 2003, Education records are any records of information which:

- are being processed by or on behalf of a school/education authority

¹ The Pupils' Education Records (Scotland) Regulations 2003 S. I. 2003 No. 581

² As defined in Education (Scotland) Act 1980

³ As defined in The Pupils' Education Records (Scotland) Regulations 2003

- relate to any individual who is or has been a pupil at the school/education authority
- relate to the school education of the person
- originate from or was supplied by a teacher or other EDC staff, the pupil themselves or a parent of that pupil

Information kept by teachers or other employees solely for their own use e.g. forward plans and diaries, are not education records and are exempt from access under *these* regulations. However, other legislation, such as Freedom of Information, may allow some level of access to these records (see separate FOI guidance).

Pupil rights

The Data Protection Act gives all school pupils, regardless of age, the right of access to their school pupil records. Requests to see or receive copies of records should be made in writing or some other permanent format to the head teacher.

Pupils may be asked to verify their identity through photographic identification and proof of address, especially if they are unknown to the school e.g. a former pupil. They may also be asked for information necessary to help locate relevant information about them, for example the dates between which they attended the school.

In addition to the right to be given a copy of their records, pupils are entitled to be given a description of the personal data that makes up the record. This should be given together with details of the purposes for which the data are processed, the sources of the data (if known) and the individuals or organisations to which the data may have been disclosed.

Pupils have a right to access all records containing their personal information as well as their education records. In exceptional circumstances some information may be withheld at the discretion of the Head Teacher in collaboration with the Freedom of Information Officer or Legal Services. The main exemptions are information that:

- may cause harm to the physical or mental health of the pupil or a third party
- would identify a third party (e.g. another pupil but **not** a teacher)
- are a record of special educational needs
- are adoption records
- are court/children's panel records where the court/panel has prohibited disclosure
- the release of which would hinder the prevention and detection of crime
- are examination scripts
- are examination marks that are to be formally published
- are confidential references given **by** the school for the purposes of education, training or employment

For more information contact the Freedom of Information Officer.

Parent rights

Parents only have a right of access to their child's education records as defined by the Pupils' Education Records (Scotland) Regulations 2003. This is a statutory right and therefore cannot be blocked by a pupil, regardless of age.

Parents should request access in writing or some other permanent form to the head teacher. The school is not obliged to release any information until it is fully satisfied as

to the identity of the parent. This may be through requesting photographic identification and proof of address.

As well as the information that is exempt from disclosure to the pupil themselves given above, parents do not have a right of access to the following:

- information that is defined as sensitive by the Data Protection Act 1998, i.e. data that identifies:
 - racial and ethnic origin
 - political opinions
 - religious or other beliefs
 - trade union membership
 - physical or mental health or condition
 - sexual life
 - criminal convictions
 - commission or alleged commission of an offence
- where disclosure in the opinion of the school would be likely to cause significant mental or physical harm to the child (e.g child protection issues)

Third party data

If information that is to be released would identify a third party, for example another child, or is a document originating from outside the school, then the consent of that third party should be obtained prior to its release.

It is recommended that ten days should be allowed from requesting consent, for consent to be given or declined. If consent is denied, there is no response from the third party or it has been impossible to locate the third party to obtain consent, then the school should consider releasing the document with the names and any identifying information blanked out.

Responding to a request

Once a bona fide request has been received, the School is required to:

- a) allow a parent to inspect the non-exempt records within 15 school days
- b) provide the parent with a copy of the data within 15 school days

If the recipient requests information in another format (e.g. Braille) or an alternate language the School must comply with this request if it is felt to be reasonable. The cost of providing information in alternative formats cannot be passed onto the parent. Policy & Public Affairs are able to help in arranging translation and other formats and corporate funds may be available to help.

A fee for supplying copies of information may be charged. This is based on the number of pages supplied and is set down in statute⁴ as:

⁴ The Data Protection (Subject Access) (Fees and Miscellaneous Provisions) Regulations 2000 S. I. 2000 No. 191

No of pages	Maximum fee
1-19	£1
20-29	£2
30-39	£3
40-49	£4
50-59	£5
60-69	£6
70-79	£7
80-89	£8
90-99	£9

No of pages	Maximum fee
100-149	£10
150-199	£15
200-249	£20
250-299	£25
300-349	£30
350-399	£35
400-499	£40
500+	£50

Retention of records

Pupil records should be retained for 7 years after education has ceased.

Rectification and erasure of inaccurate information

A parent may request that inaccurate information held within a pupil's education records be erased or corrected. The school or education authority need only comply if the parent:

- supplies sufficient information to locate the data that is inaccurate
- specifies how the data is inaccurate
- specifies in what manner the record should be rectified or what information should be erased

Once satisfied with a parent's request, the school should:

- rectify or erase the information
- rectify or erase any expression of opinion that appears to the school to be based on inaccurate information
- provide the parent with a copy of the rectified information

DISCLOSING TO POLICE AND STATUTORY BODIES

Although it is very tempting to supply information to uniformed officers this could prove to be very dangerous. Many organisations have been approached by, and supplied information to, bogus officials. This should be borne in mind whenever dealing with outside organisations.

If an officer, or other officer working for a statutory body such as Benefits Agency, requests personal data from you it should be in writing stating the legal power under which they are requesting the information. This should be signed by a police officer at least the rank of Inspector, or if it is an Inspector or above making the request at least one rank above them. You should request the appropriate paperwork from the officer requesting the information or ask the individual to complete a Criminal Investigation Release Form (see Appendix IV). For non-Police bodies requesting information the relevant authorising grade is given on the form.

The signature of an Inspector or above will not deter police requests or delay them as there is always an easily accessible duty inspector; this will however mean that all requests are legitimate.

The officer requesting the information must be able to identify the reasons for needing the information. If this cannot be done **do not disclose the information.**

Solicitors and Court Officials

Any request for information from a solicitor should be accompanied by a statement of the legal power being used for the request. Section 35(1) of the Act allows for such disclosures, but only where the requesting solicitor applies a correct legal power. Any request for information received from solicitors should be dealt with within the strict legal framework of the Act, further information can be sought from the Freedom of Information Officer on 0141 775 4571 should a request be received.

Courts have powers to request information, these requests should ideally be accompanied by a court order, and advice can be sought on a case by case basis as above.

CREATING A DATA PROTECTION STATEMENT

A Data Protection statement on a form should state the

- identity of the data controller (this will always be East Dunbartonshire Council)
- The purposes for which the data is being collected and used

It may also include:

- Who the information will be shared with, e.g. agents of the Council, external bodies
- An opt-out of direct marketing

Sample layout/phrases

The information provided on this form will be processed by East Dunbartonshire Council in accordance with the Data Protection Act 1998.

The data you provide will be used for [enter purposes for which data will be processed e.g. administering library membership, processing your competition application, statistics etc. There is no need to state reasons for which it will not be used!]

We may pass your information to [enter names of bodies e.g. agents, contracted Council service providers etc]

We may contact you by phone/post/email notifying you of other events/services that we feel may be of interest to you. If you do not wish your details to be used for such marketing purposes please tick the following box ☐

Examples

The information provided on this form will be processed by East Dunbartonshire Council in accordance with the Data Protection Act 1998. The data you provide will be used for the purpose of administering your library membership. We may contact you occasionally to let you know about library events that may be of interest to you. If you do not wish to receive such communications, please tick this box ☐

The information provided on this form will be processed by East Dunbartonshire Council in accordance with the Data Protection Act 1998. The data you provide will be used for the purpose of administering school lets and will be shared within East Dunbartonshire Council, public and voluntary sectors. It is also our intention to post basic information on your group, including contact details as supplied on this form, on the Council website which may be viewed by the public. If you do not wish your group's details to be posted on our website please tick this box ☐

Consent Form for Internal Publications and School Web-Site**(Name of School)**

To the Parent or Carer of

Name of child: -----

School: -----

(School name) would like to use photographs of your child. These photographs may appear in our printed publications, on our website, or both.

Before using any photographs of your child, we need your permission. Please answer questions 1a and 1b and 2a and 2b, and then sign and complete the form below.

Please return this form to *(Head Teacher)* at the address detailed below as soon as possible.

May we use your child's photograph in printed publications
produced by (name of school)? Yes / No *

May we insert your child's name next to his/her
photograph? Yes / No*

May we use your child's photograph on the school's
website? Yes / No *

May we insert your child's name next to his/her photograph
on the website? Yes / No*

* Please delete as appropriate

(Please note that images used on internet/web-sites have the capability of being viewed by any person with Internet access world wide. The school cannot control who will view the images or the countries in which the images may be accessible, this may include countries without adequate protection of personal data).

This form is valid for one school session from the date of signing, however, your consent can be withdrawn at anytime.

Signature: -----

Name: -----

Relation to child:-----

Date: -----

Please return this form to:

Please note: This form should be accompanied with a letter explaining the use to which the photographs may be used internally.

Consent Form for External Publications (newspapers etc) and External Websites

(Name of School)

To the Parent or Carer of

Name of child: -----

School: -----

The school on occasions may send photographs of your child to the newspapers. These photographs may appear in printed publications, on their website, or both.

Before using photographs of your child, we need your permission. Please answer questions 1a and 1b and 2a and 2b, and then sign and complete the form below.

Please return this form to *(Head Teacher)* at the address detailed below as soon as possible.

May we use your child's photograph in external publications (newspapers etc)?	Yes / No *
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May we insert your child's name next to his/her photograph?	Yes / No*
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May we use your child's photograph on external publications' websites?	Yes / No *
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May we insert your child's name next to his/her photograph on the website?	Yes / No*
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* Please delete as appropriate

(Please note that images used on internet/web-sites sites have the capability of being viewed by any person with Internet access world wide. The School can not control who will view the images or the countries in which the images may be accessible, this may include countries without adequate protection of personal data).

This form is valid for one school session from the date of signing, however, your consent can be withdrawn at any time.

Signature: -----

Name: -----

Relation to child:-----

Date: -----

Please return this form to:

Please note: This form should be accompanied with a letter explaining the use to which the photographs may be used in external publications.

**DATA PROTECTION ACT 1998 – Request for the Disclosure of Personal Data
Under section 29(3) of the DPA 1998**

REQUESTING OFFICER: Rank

Name:

FORCE & DIVISION:

Badge No:

Contact Address:

Tel No:

Fax:

I, _____ am making enquiries which are concerned with:

- * a.) The prevention or detection of crime
- * b.) The apprehension or prosecution of offenders
- * c.) The assessment or collection of any tax or duty

1. Please supply the following information concerning:

Name:	DOB:
Information required:	

2. The information is necessary for investigating the offence of:

--

3. Please supply reasons why this information is necessary (if this section is left blank due to sensitivity the form requires the authorisation of a superintendent or higher).

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I understand that the information is being released to me purely for the above purpose(s) and that failure to disclose the data would be likely to prejudice these matters. The information disclosed will only be retained beyond the timescales required for any present investigation where such retention is in compliance with all applicable laws relating to the retention of criminal intelligence.

Signature of applicant:----- Date: -----

AUTHORISING OFFICERS STATEMENT – must be completed by the following rank (for urgent requests only, the lower rank in brackets may authorise): Police: Chief Inspector (Inspector); customs Band 8 (7); Inland Revenue Band C1 (C2); BA Band C4 (C3)

I, _____ hereby authorise the above request for information.

Signature of A/O: ----- Date: -----

Consent Form for Pupils Photographs Held Within SEEMIS

To the Parent or Guardian of:

Name of Child: _____

School: _____

Scottish Educational Establishments Management Information System (SEEMIS)

(School Name) would like to hold your child's photograph within the school's management information system (SEEMIS). This is a secure site and only authorised East Dunbartonshire Council employees will have access. The benefits of this are as follows:

- Identification of pupils in school for guidance and assists new teachers in identifying pupils.
- Quick identification of missing children, at home and on school trips.
- Uploading school photograph onto pupils Young Scot National Entitlement Card.

If you **do not** wish your child's photograph to be kept within Click & Go, please complete as below and returned to **(Head Teacher)**.

I **do not** wish my child's photograph to be held on the school's MIS (SEEMIS).

Name: _____

Relation to Child: _____

Signature: _____ Date: _____

Please return form to: