

PUPILS DATA PROTECTION POLICY 2014

Coming into force: April 2014

To be reviewed: October 2014.

The policy is under continuous review; it shall be formally reviewed annually at the end of the school year, in July.

Distribution: To all teaching, administrative, support staff, as well as to parents and the wider school community.

The policy is to be available in print in the School's offices, in the admissions package, as well as online, on the school's website.

1. Data Protection Policy

The School is processing personal data regarding pupils and their parents / guardians as part of its operation and shall uphold the policy of privacy at all times.

This policy refers to the internal management of information and to third party disclosures.

The policy applies to current, past, and prospective pupils and their parents/guardians.

The school may keep for statistical purposes some information regarding applicants that have not been accepted as students of our school.

2. Supervision & Responsibilities

Responsibility for the day-to-day protection of data sits with the school's Administrative Assistant.

The Headteacher / Business Manager is responsible for controlling the use and processing of personal data.

The School's will aim is to be compliant with the principles of UK Data Protection Acts and respectful of the legislation governing data protection on Romanian territory.

3. Principles

The School will comply with the data protection principles aimed to ensure that all data is:

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with data subjects' rights
- Secure
- Not transferred to parties in other countries without adequate protection
- Data is not transferred to third parties commercial or of other kinds
- Data about specific pupils and their parents / guardians will not be used for marketing purposes

4. Personal Data

Personal data covers both facts and opinions about an individual. The School may need to, in the course of conducting its business, process a wide range of personal data of pupils, their parents or guardians. This personal data may include (but is not limited to): names and addresses, bank details, academic, disciplinary, admission and attendance records, references, examination scripts and marks.

5. Processing of Personal Data

Consent may be required for the processing of personal data unless the processing is necessary for the School to undertake its obligations to pupils or parents.

The admissions process requires the handling of personal data; it is thus implicit by submitting the application that you give your consent for the handling of the respective data by the School.

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 prior written consent of the appropriate individual under the terms of this policy.

6. Sensitive Personal Data

Sensitive personal data includes

- medical information
- data relating to religion, race, criminal records,
- family status such as undergoing divorce of parents,
- visiting rights
- custody of children
- abuse, neglect, or a history of substance abuse
- restraining and protection orders by courts
- freezing of assets and incapacity of payment

Where such data is processed then the explicit consent of the appropriate individual or of both parents / guardians will be required in writing.

Data of medical nature that is required for the safeguarding of your child or the School's community (i.e. cases of contagious diseases, etc.) will be shared by default with the school's staff.

Data regarding the financial situation of the sponsor will not be shared with staff and will be limited to the staff working with accounting and financial information.

Data regarding restraining orders, abuse, custody, etc., may be shared, in case of necessity, with staff and the school protection personnel.

7. Rights of Access

Individuals have a right of access to information concerning themselves held by the School. Any individual wishing to access this data needs to put their request in writing. The School will respond to such a request as soon as is reasonably practicable.

Data about child assessment, transcripts, examination results, etc., does not fall under the same provisions and constitutes a separate category for which various fees may apply.

Some data is exempt from the right of access. This may include information:

- that identifies other individuals
- that is subject to legal professional privilege.

8. Confidentiality

The School will treat as confidential all information given by parents, guardians, other schools and third party organisations for the purpose of the education or prospective education and training of any pupil.

Children and parents have the right to access references and recommendations relating to them received by the School, except for the instances when the source has explicitly requested not to be identified or the reference disclosed.

9. Possession Rights of Data

Data belongs to the people it refers to. The School will rely on parental consent to process data relating to pupils unless the nature of the processing and the pupil's age and understanding make it unreasonable under the circumstances to rely on the parent's consent.

Parents should be made aware that in such situations, they may not be consulted. This includes confidentiality between medical staff and pupils, as well as discussions with the school's psychological counsellor.

The School will only grant the pupil direct access to their personal data if it reasonably believes the pupil understands the nature of the request.

Pupils agree that the School may disclose their personal data to their parents or guardian.

Such provisions may apply only to pupils from the age of 14 yrs. and above.

10. Cases of severe distress

Severe cases and situations of reasonable doubt of potential self-harm and threat to life and/or the well-being of an individual may be disclosed to parents or to third parties such as the Police and emergency medical personnel.

11. Other non-disclosure exceptions

Other data that will be disclosed to parents, guardians, or specific third parties:

- The prevention or detection of crime
- The assessment of any tax or duty
- The change in academic status of a pupil (i.e. withdrawals from school, etc.)

12. Disclosure of Information

The School may receive requests from third parties to disclose personal data it holds about pupils, their parents or guardians. The School confirms that it will not generally disclose information unless the individual has given their consent or one of the previously stated specific exemptions applies.

The School will disclose data to third parties for the following purposes:

- To give a confidential reference concerning a pupil to any educational institution which it is proposed that the pupil may attend - except for the explicit request by the pupil not to do so.
- To give information relating to outstanding fees or payment history to any educational institution which it is proposed that the pupil may attend
- To publish the results of public examinations or other achievements of pupils
- To disclose details of a pupil's medical condition where it is in the pupil interest to do so, for example for medical advice, insurance purposes or to organizers of school trips

Should the School receive a disclosure request in writing from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure.

The School will grant access to its video recordings of the campus grounds to Police officers and Police investigators presenting a written request or a warrant for the release of the video recordings.

13. Use of personal information

The School will make use of personal data relating to pupils, their parents or guardians in the following ways:

- For fundraising, marketing or promotional purposes
- Alumni association
- Establishing or maintaining contact with pupils.

Should you wish to limit or object to any such use please notify in writing the School's Board at any time.

14. Use of pupils photos

The use of photos of the School's pupils, parents, or both, for publication, online, or on social media sites is forbidden unless explicit consent is granted in writing by parents / guardians, or by the pupils themselves from the age of 16 yrs. and above.

The School will by default not publish photographs of individuals, nor will it make use of them in relation to third parties, without the explicit consent of parents / guardians or of the pupils themselves from the age of 16 yrs. and above.

15. Maintaining the data up-to-date

Parents, guardians, and pupils have the obligation to notify the School of any changes to information held about them. Any individual has the right to request that inaccurate information about them is erased or corrected.

The school will request a confirmation regarding the accuracy of the contact details of parents/guardians twice per year; it may also do so at any time it deems necessary.

16. Data Security

The School will adopt measure to ensure that members of staff will only have access to personal data relating to pupils, parents / guardians where it is necessary for them to do so.

Academic records and records of financial transactions and agreements will be stored and processed separately from each other.

All staff will be made aware of their responsibility to keep information confidential. All staff contracts shall include provisions regarding the confidentiality of information pertaining to the School and its community. This shall apply to collaborators and extra-curricular activities staff as well.

The School will ensure that all personal information is held securely and is not accessible to unauthorized persons.

Electronic data will be properly protected and print data will be stored where it is not accessible to anyone who does not require viewing or processing that data.

17. Complaints

Any person believing their data has been mishandled should address a written complaint to the School's Board. The Board shall investigate the matter and propose solutions for redressing the situation. The plaintiff may be requested to present their case in a school board meeting. The board may decide to appoint one of its members to liaise with the plaintiff.

18. Lifetime of data

The school will keep all records and data of its pupils for the entire period the child is attending Verita School plus a period of no less than 5 years after the child has left the school or has graduated.

The disposal of any personal data will be conducted in a manner that protects the rights and privacy of all individuals.