

Campion School

Privacy Notice



INTRODUCTION

The intention of this privacy notice is to provide information about how Campion School will use (process) personal data of individuals.

Campion School ('the School') is the data controller and aims to ensure that all personal data collected regarding staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018).

The School is committed to the following: to ensure that an individual's privacy is protected according to the principles set out in the GDPR; to treat personal information lawfully and fairly; to use the information in accordance to the School's policy; to keep information accurate and up-to-date; and to keep personal information no longer than necessary. All personal information will be processed with integrity and confidentiality.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Systems & Data Manager as the School's Data Protection Officer. She will deal with any requests and enquiries concerning the School's uses of personal data and endeavour to ensure that all personal data is processed in compliance with the School's policy and the Data Protection Law.

THIS POLICY

The School may change this policy occasionally by updating this page. This policy has been updated as of September 2018.

WHAT IS PERSONAL DATA?

Personal Data is information that identifies an individual and relates only to that individual. This includes a pupil's contact details, including parents' or guardians' details. The School also holds information for staff employment purposes, such as contact, financial and professional details.

HOW AND WHY THE SCHOOL COLLECTS AND USES PERSONAL DATA

The School collects and processes personal information about individuals to facilitate the daily operation of the School. Generally, the School receives the information from the individual directly. Usually this is done via a form or communication with the School (for example email, online forms and telephone calls). In some cases, personal data may be supplied by a third party (for example another school, or other professionals or authorities working with that individual). This includes both paper and digital forms.

Some of the School's processing activities are necessary and fulfilled by the School's legal rights, duties or obligations under the Data Protection Law, including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The School expects that the following uses may fall within that category of its (or its community's) 'legitimate interests':

- Selection and admission of pupils: to confirm the identity of prospective pupils and their parents, and in some cases assessing eligibility for scholarship and means-tested bursary awards.
- Providing educational services, including additional services such as musical education, physical training, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs.
- Maintaining and communicating with alumni and the school community about events and performances.
- For the purposes of management planning and forecasting, research and statistical analysis, including those imposed or provided for by law.
- Giving and receiving information and references about past, current and prospective pupils, including outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend and to provide references to potential employers of past pupils.
- Enabling pupils to take part in exams and assessments, analysing and publishing the results of public examinations or other achievements of pupils of the School including destination of graduates.
- Safeguarding pupils' welfare and provide appropriate pastoral care.
- Monitoring the use of the School's IT and communications systems in accordance with the school's ICT Acceptable Use Policy.
- Using photographic images of pupils as necessary for the School's administrative, functional, educational and pastoral purposes. For example, photographs or videos from school events may be used in school publications, the official school website or social media accounts, to show to the school community and prospective parents and pupils what we do here at the school.
- For security purposes, including CCTV, to ensure the School's premises are secure.
- Managing and recruiting staff, volunteers and contractors, conducting the relevant safeguarding checks as required by law, payroll, providing and receiving references and keeping staff records.
- Where otherwise reasonably necessary for the School's purposes, including obtaining appropriate professional advice and insurance for the School.

Sensitive Data

The School may need to share special category data (for example health and medical records) or criminal records (DSB checks, *Poiniko Mitroo* or other) as imposed by the law, including safeguarding and employment. These reasons may include:

- To safeguard pupils' welfare and provide appropriate pastoral care (this may include medical), and to take appropriate action in the event of an emergency, incident or accident, including the disclosure of details regarding an individual's medical condition where it is in the individual's interests to do so: for example, for medical advice, insurance purposes or to organisers of school trips.
- To provide educational services in the context of any special educational needs of a pupil.
- In connection with employment of its staff, for example DBS checks.
- For legal and regulatory purposes (for example child protection and health and safety) and to comply with its legal obligations and duties of care.

Fees

The School may make enquiries of pupils' previous schools for confirmation that all sums due and owed have been paid. The School may also inform other schools of sums outstanding when pupils are transferring to a new school.

Sharing personal data with third parties

We may be required to share personal data, including sensitive data, with third parties including public authorities, independent school bodies such as Independent Schools Inspectorate (ISI), health professionals, professional advisors, examination boards, travel organisations, insurance providers, school photographers, and other service suppliers.

In accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

These will include:

- Names, addresses, telephone numbers, email addresses and other contact details.
- Bank details and other financial information, e.g. about parents who pay fees to the school or staff payroll.
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination marks.
- Where appropriate, information about individuals' health, and contact details for their next of kin.

- References given or received by the School about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils.
- Images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system.

HOW LONG DO WE KEEP THE DATA?

The School will retain personal information securely and for no longer than necessary in order to educate and look after its pupils. The School will keep some information after a pupil has left the School, for example should a copy of their school reports or a transcript be needed.

In exceptional circumstances the School may keep personal information for a longer time than usual but only if there is a legitimate reason for doing so and only if allowed under the Data Protection Law.

The School can keep information about individuals indefinitely if the School needs this for historical, research or statistical purposes.

YOUR RIGHTS AND REQUESTS FOR INFORMATION

Under the Data Protections Law, data subjects (named living individuals) have the right to access and understand personal data held about them and, in some cases, ask for it to be amended or for the school to delete it. However, these requests are subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data (subject access request), or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should email their request to datamanager@campion.edu.gr.

The school will respond to any such written requests as soon as is reasonably practicable and, in any event, within 30 days. The School recognises its duty to provide data subjects making the request with a copy of any personal data processed.

The School will be able to respond quicker to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the School may ask the individual to reconsider or may charge a proportionate fee, but only where the Data Protection Law allows it.

Certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The School is not required to disclose any pupil examination scripts nor any confidential reference given by the School for the purposes of education, training or employment of any individual.

The School may rely on consent from the parent or guardian to process personal data relating to pupils unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Pupils aged 15 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, their rights under law and other circumstances.

In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the School's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise: for example, where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect personal data and privacy of others, and to comply with the school's ICT Acceptable Use Policy and the school rules. Staff are under the professional duty to do the same, covered under the relevant sections in the Staff Handbook.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to individuals is as up to date and accurate as possible. It is an individual's responsibility to inform the School, as soon as possible, if they believe that any of their information is found incorrect or incomplete. The School will promptly correct any information found to be incorrect. Please notify datamanager@campion.edu.gr of changes to important information.

The School is committed to ensuring personal information is kept secure. The School will take appropriate technical and organisational steps, including maintaining and updating policies around the use of technology, devices and access to school systems.

QUERIES AND COMPLAINTS

Any comments or queries about this policy should be directed to the Systems & Data Manager using the following email address: datamanager@campion.edu.gr.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the Parental Complaints Procedure and notify the Headmaster in writing. The School can also make a referral to or lodge a complaint with the Hellenic Data Protection Authority (HDP), although the HDP recommends that steps are taken to resolve the matter with the School before involving the regulator.

Policy updated: September 30th 2018