



## **Data Protection Policy**

For the purposes of the Data Protection Act 1998, CERENE is the data controller of personal data about past, current and prospective pupils, their parents and guardians as well as data about past, current and prospective staff and third party contractors.

During the course of our activities, the School will process personal data (which may be held on paper, electronically, or otherwise) about our pupils, parents and staff and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 1998 (DPA).

The purpose of this notice is to make you aware of how we will handle your personal data.

The School will comply with the eight data protection principles in the DPA, which say that personal data must be:

1. Processed fairly and lawfully
2. Processed for limited purposes and in an appropriate way
3. Adequate, relevant and not excessive for the purpose
4. Accurate
5. Not kept longer than necessary for the purpose
6. Processed in line with individuals' rights
7. Secure
8. Not transferred to people or organisations situated in countries without adequate protection

"Processing," means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

### **1. PERSONAL DATA PROCESSED BY THE SCHOOL**

The School collects and processes personal data to enable us to operate as a school. This may be:

- Objective or factual, e.g. names, contact details, next-of-kin, birth dates, attendance records;
- Subjective, e.g. reports or grades, appraisals etc. that may include opinions;
- Sensitive: the School may, from time to time, process sensitive personal data such as medical conditions, ethnic groups, or criminal records and proceedings and in relation to parents and/or guardians, financial information; or
- Images: with the relevant permission, the School may publish images of staff and pupils engaging in School activities.

Your personal data will usually be collected directly from you, but some may be passed to the School by third parties (e.g. other schools, medical practitioners).

## **2. PURPOSES FOR WHICH YOUR DATA MAY BE PROCESSED**

We will usually only process your personal data where you have given your consent or where the processing is necessary to comply with our legal obligations.

Your personal data (including sensitive personal data, where appropriate) is processed by the School strictly in accordance with the DPA in order to:

- Support teaching and learning;
- Monitor and report on pupils' progress;
- Analyse and publish examination results and university destinations of alumni;
- For Health and Safety purposes, including to provide appropriate pastoral and medical care;
- Offer better teaching support: medical and para-medical information may be shared with CERENE's teachers, with your prior formal consent.
- Collect information for central or national statutory authorities or exam boards;
- Promote the School and its activities (e.g. events or reunions);
- Normal administrative duties, for example: to assess and admit pupils and recruit staff;
- Monitor email communications or internet access to ensure compliance with School Rules, and strictly in accordance with the School's IT Code of Conduct;
- And for other lawful and reasonable purposes relating to its operation as a school and employer.

Unless you request otherwise, the School may also use your contact details to send you information by post, email and SMS about the School and its activities.

In any other circumstances, personal data will not be shared with any other third party organisation without prior consent of the person concerned. We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

The School will review this Policy on an annual basis and reserves the right to change the Policy at any time.

## **3. YOUR RIGHT TO ACCESS YOUR PERSONAL DATA**

Data subjects (named, living individuals) about whom the School processes data, have a right to expect the School to safeguard their data at all times. They also have rights under the DPA to be given access to personal data held about them by the School. Access usually carries a fee to cover administrative costs. It is often easier for data subjects simply to ask the School what information is held about them and negotiate access. If you wish to exercise your right under the DPA to know what personal data the School holds about you, you must make the request in writing, with an accompanying fee of £20. All such requests should be sent to the School for the attention of the Head.

#### **4. THIRD PARTIES WITH WHOM THE SCHOOL MAY NEED TO SHARE PERSONAL DATA**

The School does not share data with other organisations or individuals for commercial purposes, unless specific consent is given. We may be required to share some data,

including sensitive personal data, with third parties including: local authorities, other public authorities, independent school bodies such as the Department for Education. Third parties who manage data on behalf of the School are known as data processors in respect of the personal data they receive, and must also comply with the DPA.

#### **5. FURTHER QUESTIONS**

If you have any queries about this notice or how the School processes personal data, please contact the Head.

Policy devised July 2016

Review date July 2017