

Data Protection Policy

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WHO WE ARE

Caxton College is a data controller for the purposes of data protection law. This means that the school determines how people's personal information is processed and for what purpose.

POLICY STATEMENT

Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities as a school we will collect, store and process personal data about our pupils, staff, parents and others. This makes us a data controller in relation to that personal data.

We are committed to the protection of all personal data and special category personal data for which we are the data controller.

The law imposes significant fines for failing to lawfully process and safeguard personal data and failure to comply with this policy may result in those fines being applied.

All members of our staff must comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary or other action.

RESPONSIBILITY FOR DATA PROTECTION

The school has appointed the Head of the accounting department as a DPO who will deal with all the requests and enquires concerning the school's use of personal data and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law.

The DPO is responsible for ensuring compliance with the Data Protection Legislation and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the DPO.

The DPO is also the central point of contact for all data subjects and others in relation to matters of data protection.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

Names, addresses, telephone numbers, e-mail addresses and other contact details from staff, parents or tutors and students.

Car details for those who use our car parking facilities.

Biometric information, which will be collected and used by the School in accordance with the School's biometrics policy.

Bank details and other financial information, e.g. about parents who pay fees to the school.

Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks.

Personnel files, including in connection with qualifications, employment or safeguarding.

Where appropriate, information about individuals' health and welfare and contact details for their next of kin.

References given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils.

Correspondence with and concerning staff, pupils and parents past and present.

Images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images of children).

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

To provide education services, trips and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;

To give and receive information and references about past, current and prospective pupils.

For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents).

For the purposes of processing or assisting with visa applications.

Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity.

To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate.

To enable pupils to take part in British or Spanish assessments, and to publish the results of public examinations or other achievements of pupils of the School.

To safeguard pupils' welfare and medical needs and provide appropriate pastoral care.

To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT.

To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children.

For security purposes, including CCTV in accordance with the School's policies.

For legal purposes, e.g. Time and Attendance Register.

HOW THE SCHOOL COLLECTS DATA

The school receives personal data from parents or tutors about themselves or their children. This may be via:

Email
Parent profile
Form

The school receives personal data from staff or prospective staff. This may be via:

Email
Form
Web page
Documentation in paper

The school receives personal data from suppliers or prospective suppliers.
This may be via:

Email
Documentation in paper

Also in some cases personal data may be supplied by third parties (for example another school or other professionals or authorities working with that individual) or collected from publicly available resources.

DATA PROTECTION PRINCIPLES

Anyone processing personal data must comply with the data protection principles established in the document “Data protection policy for teaching staff” and in the document “Notice of functions and obligations for staff”.

PROCESSING FOR LIMITED PURPOSES

In the course of our activities as a school, we may collect and process some personal data for special activities/specific purpose. This may include personal data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and personal data we receive from other sources (including, for example, local authorities, other schools, parents, other pupils or members of our workforce).

We will only process personal data for that specific purposes or for any other purposes specifically permitted by Data Protection Legislation or for which specific consent has been provided by the data subject.

We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject, unless otherwise permitted by Data Protection Legislation.

PROCESSING AND ACCESSING IN LINE WITH DATA SUBJECT'S RIGHTS

We will process all personal data in line with data subjects' rights, according to this policy and to the "Privacy policy for parents and guardians regarding their and their children data".

DATA SECURITY

We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

Security procedures:

Entry controls. Any stranger seen in entry-controlled areas should be reported.

Secure lockable desks and cupboards. Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential).

Methods of disposal. Paper documents should be destroyed. Digital storage devices should be physically destroyed when they are no longer required.

Equipment. Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

Document printing. Documents containing personal data must be collected immediately from printers and not left on photocopiers.

Any member of staff found to be in breach of the above security measures may be subject to disciplinary action.

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

We may share personal data that we hold about data subjects, and without their consent, with other organisations. Such organisations include the Department for Education, [and / or Education and Skills Funding Agency ESFA], Ofsted, health authorities and professionals, the Local Authority, examination bodies, other schools, and other organisations where we have a lawful basis for doing so.

The school] will inform data subjects of any sharing of their personal data unless we are not legally required to do so, for example where personal data is shared with the police in the investigation of a criminal offence.

IMAGES AND VIDEOS

Parents authorise their children (and students over 14 authorise themselves) the right to appear in any images or videos that are taking in the school or any other events organized by the school.

CCTV

The school operates a CCTV system (find attached the policy document).

CHANGES TO THIS POLICY

We may change this policy at any time. Where appropriate, we will notify data subjects of those changes.



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