



St. Lawrence College
The British School in Greece

St. Lawrence College

Data Protection

Policy

Issued: September 2019

To be reviewed: September 2020

To be distributed to: Staff, Parents & Visitors via school website



1. Data Protection Policy

The St. Lawrence College is obliged to process relevant personal data regarding pupils and their parents and guardians as part of its day-to-day practice. St. Lawrence College will do its best to abide by the standards and processes contained in this policy.

Processing may include obtaining, recording, holding, disclosing, destroying or otherwise using data.

In this policy, any reference to pupils includes current, past or prospective pupils.

2. Data Protection Officer (DPO)

St. Lawrence College Data Protection Officer (DPO) will be responsible for all day to day data protection matters and is as such the designated DPO. The Head of school will be fully briefed by the DPO with respect to the use and processing of personal data. At all times, St. Lawrence College will aim to be compliant with the legal framework of GDPR (General Data Protection Regulation) while being mindful of the principles of UK Data Protection Acts.

3. The Principles

So far as is reasonably practicable St. Lawrence College 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 and not transferred to parties in other countries without adequate protection.



4. Personal Data

Personal data covers both facts and opinions about an individual. St. Lawrence College 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 St. Lawrence College to undertake its obligations to pupils or parents. 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

St. Lawrence College may, from time to time, be required to process sensitive personal data regarding a pupil or their parents. Sensitive personal data includes medical information and data relating to religion, race or criminal records and proceedings. Where such data is processed then the explicit consent of the appropriate individual will be required in writing.

7. Rights of Access

Individuals have a right of access to information concerning themselves held by St. Lawrence College. Any individual wishing to access this data should put their request in writing to the DPO. St. Lawrence College will respond to such a request as soon as is reasonably practicable and is entitled to charge an administration fee for providing this information.



Certain data is, of course, exempt from the right of access under data protection acts. This may include information:

- Which identifies other individuals
- Which St. Lawrence College reasonably believes is likely to cause damage or distress
- Which is subject to legal professional privilege.

St. Lawrence College is also not required to disclose pupil's examination scripts.

8. Confidentiality

St. Lawrence College will treat as confidential any reference given by the school for the purpose of the education or prospective education, training or employment of any pupil. An individual has the right to access to a reference relating to them received by the St. Lawrence College. However, such a reference will only be disclosed if such disclosure will not identify the source of the reference.

9. Whose Rights?

The rights under the legal framework of GDPR are personal to the individual to whom the data relates. In most cases St. Lawrence College 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.



10. Exemptions

Certain data is exempted from the provisions of data protection legislation which includes the following:

- The prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the St. Lawrence College
- Any further information on exemptions should be sought from St. Lawrence College DPO.

11. Disclosure of Information

St. Lawrence College may receive requests from third parties to disclose personal data it holds about pupils, their parents or guardians. St. Lawrence College confirms that it will not generally disclose information unless the individual has given their consent or one of the previously stated specific exemptions applies. However, does intend to disclose such data as is necessary 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
- 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's interest to do so, for example for medical advice, insurance purposes or to organisers of school trips
- Where St. Lawrence College receives 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.
- To disclose details of pupils to third parties, such as organisers of trips, events, sports tournaments, academic competitions etc.



12. Use of personal information by St. Lawrence College

St. Lawrence College will, from time to time, make use of personal data relating to pupils, their parents or guardians in the following ways:

- For fundraising, marketing or promotional purposes
- To maintain relationships with pupils of St. Lawrence College, including transferring information to any association, society or club set up for the purpose of establishing or maintaining contact with pupils.

Should you wish to limit or object to any such use please notify the DPO at the time of enrolment or in writing at any other time.

13. Online Courses, Curriculum Plans, Schemes etc.

During the academic year at St Lawrence College, your child will be enrolled, as appropriate, on secure websites for educational purposes, including enhanced learning, tracking and assessment.

- *ISAMS*-It's a school administration management information system, for management of all academic, wellbeing and administrative information.

<https://www.isams.com/company/privacy/>

- *Collins Busy Ant Maths/Abacus Maths*

Digital resources and activities connected to the learning done in class, home learning and assessment. The online platform enables us to measure whether pupils are on track in their learning of the programmes of study.

<https://connect.collins.co.uk/school/HelpFiles/PrivacyPolicy.html>

<https://www.abacus.com/privacy>



- *CEM (The Centre for Evaluation & Monitoring at Durham University)*

A range of standardised assessments, including Aspects for FS2 pupils, PIPS Baseline for Reception pupils and InCAS assessments for pupils in various Key Stages. These diagnostic, computer-adaptive assessments provide useful data and evidence of pupil progress in Reading and Maths used for analysis and whole school planning. The feedback from CEM's monitoring systems is reliable, accurate and confidential, enabling the school leadership team to benchmark its performance against other schools, make judgements about the school's effectiveness as well as provide a wealth of information at pupil and class level to help inform teacher planning and target setting.

<https://www.cem.org/privacy-notice>

- *Tapestry* - An interactive online learning journal recording all the learning and fun of children's early years' education. It allows teachers and parents to track a child's developmental stages and milestones and assess more formally how they are progressing.

<https://tapestry.info/gdpr.html>

- *DoodleMaths* - An online maths programme for enhanced home learning, which increases enjoyment and skills in mathematics. It also allows teachers and parents to track children's progress.

<https://www.doodlemaths.com/privacy-policy/>

- *Spelling Shed* - A school spelling scheme which covers the National Curriculum targets and allows teachers to set assignments and view pupil attainment data. It also has online games for children to play against their classmates and enjoy learning.

<https://www.spellingshed.com/en-gb/privacy.html>

- *Pobble* - An online writing platform designed by and for teachers to help improve children's writing by inspiring them to become a "published author" within the global Pobble community.

<https://pobble.com/privacy-policy>



13. Photos and videos

Photographic images and videos may be taken by the teachers or the school photographers. This material may be used on school publications (such as the yearbook), distributed to parents, posted on the school website and social media, on competitions among schools, or by other parties (such as trip or event organisers, for example when a sports tournament held outside the school is live-streamed online).

St. Lawrence College will not publish photographs or videos of individuals with their full names without the express agreement of the appropriate individual.

14. Accuracy

St. Lawrence College will endeavour to ensure that personal data held in relation to an individual is accurate. Individuals must notify St. Lawrence College DPO of any changes to information held about them. Any individual has the right to request that inaccurate information about them is erased or corrected.

15. Security

St. Lawrence College will take reasonable steps to ensure that members of staff will only have access to personal data relating to pupils, parents or guardians where it is necessary for them to do so.

Academic records and records of financial transactions and agreements are stored separately from each other. All staff will be made aware of their duties under Data Protection legislation and the data process in the school and are obliged to have an addendum to their work contracts which obliges them to take appropriate security measures. St. Lawrence College will ensure that all personal information is held securely and is not accessible to unauthorised persons. Data will be retrieved from secure storage by authorised personnel.

All electronic data will be properly protected and manual data will be stored where it is not accessible to anyone who does not have a legitimate reason to view or process that data. Computer workstations administration areas shall be positioned so that their screens are not visible to casual observers.



16. Enforcement

If an individual believes that St. Lawrence College has not complied with this policy or have acted otherwise than in accordance with the GDPR legislation they should use the St. Lawrence College complaints procedure and should notify the DPO.

17. Clarification

Throughout this policy where parents or guardians are referred to and their rights outlined we refer only to parents for whom there is no verifiable legal obstruction (e.g. court order).

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