

### Mission Statement

Ambrosoli is a community minded school that nurtures curiosity, creativity and global awareness through an inspiring, broad and engaging curriculum. Children learn to become resilient and respectful in an environment where each child is challenged and encouraged to thrive and achieve as an individual.

### Our Vision

Empowering pupils to become confident compassionate and internationally minded learners.

## **Policy**

At Ambrosoli International School we take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the EU's GDPR (General Data Protection Regulations)

## **Procedures**

### **1. Types of Data we Process**

We process personal data about prospective, current and past pupils and their parents, staff, suppliers and contractors; market vendors; and other individuals connected to or visiting the school including children enrolled in our Summer School or ISSAK events.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include: names, addresses, telephone numbers, e-mail addresses and other contact details of family details of admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks of education and employment data of images, audio and video recordings of financial information (e.g. for bursary assessment or for fund-raising) of courses, meetings or events attended.

As a school, we need to process special category personal data (e.g. concerning health, for example). We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

### **2. Collecting and handling personal data**

We collect most of the personal data we process directly from the individual concerned or from parents. In some cases, we collect data from third parties, for example, referees, previous schools, or professionals or authorities working with the child or from publicly available resources. Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school

systems. As we are outside of the European Economic Area, we will endeavour to ensure that any data we share with third parties will be afforded an equivalent level of protection. In the course of school business, we share personal data with third parties such as CIS. Some of our systems are provided by third parties, such as hosted databases, school website, ECCO, MTN sms services platforms such as Classroom Monitor and Tapestry Online Journal and our cloud storage providers. This is usually subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not otherwise share or sell personal data to other organisations for their own purposes.

### 3. Purpose for which we process personal data

We process personal data to support the school's operation in particular for:

- o The selection and admission of pupils
- o The provision of education to pupils including the administration of the school curriculum and timetable; monitoring pupil progress and educational needs; reporting on the same internally and to parents; administration of tests such as CAT4, reporting upon the results; providing references for pupils and staff
- o The provision of educational support and related services to pupils (and parents) including the maintenance of discipline; provision of library services; administration of sports fixtures and teams, school trips; provision of the school's IT and communications system all in accordance with our policies
- o The provision of Summer School during school holidays to pupils enrolled on such courses
- o The safeguarding of pupils' welfare and provision of pastoral care, welfare and health care services for school staff
- o Compliance with legislation and regulation including the preparation of information for accreditations by CIS and the IPC.
- o Operational management including the compilation of pupil records; the administration of invoices, fees and accounts; the management of the school's property; the management of security and safety arrangements, including the use of CCTV in accordance with our CCTV Policies and monitoring of the school's IT and communications systems in accordance with our Acceptable Use Policy; management planning and forecasting; research and statistical analysis; the administration and implementation of the school's rules and policies for pupils and staff; the maintenance of historic archives and other operational purposes;
- o Staff administration including the recruitment of staff, administration of payroll, NSSF and attendance; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;
- o The promotion of the school through its own websites, the prospectus and other publications and communications, including our social media channels; and
- o Maintaining relationships with the wider school community including PTA and CPRs, communicating with the body of current and former pupils and/or their parents or guardians and organising events.

The processing set out above is carried out to fulfil our legal obligations (including

### 4. Keeping in touch

We keep in touch with current or former parents or other members of the school community. We may use your contact details to keep you updated about our activities and invite you to events of interest by email.

### 5. How long we keep personal data

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We will be adopting Records Retention Guidelines which set out the time period for which different categories of data are kept. Currently we retain all files. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact the DPO

## 6. Your rights

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations. You always have the right to withdraw consent, where given, or otherwise object to receiving generic or fundraising communications. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this data protection notice. If you would like to access or amend your personal data or would like it to be transferred to another person or organisation or have some other objection to how your personal data is used, please make your request in writing to the DPO. We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it. You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any confidential reference given by the school for the purposes of the education, training or employment of any individual.

## 7. Pupil Data

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we rely on parental consent to process personal data relating to pupils (if consent is required). Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances. In general, we 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, we may be under an obligation to maintain confidentiality unless, in our 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 is required by law. Pupils can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. A person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils, but the information in question is always considered to be the child's at law.

## 8. Change to details

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify [admin@ambrosolischool.com](mailto:admin@ambrosolischool.com) or [DPO@ambrosolischool.com](mailto:DPO@ambrosolischool.com) of any significant changes to important information, such as contact details, held about you.

#### **9. This Policy**

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data. We will update this Data Protection Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable. If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify the DPO.

#### **Procedure**



**Robert Kabushenga**

Chair of the BoG on behalf of the BoG