

New School Rome - Data Protection Policy July 2023

The New School Rome is required to process relevant personal data regarding members of its community, including staff, visitors, applicants, parents, students and their siblings, alumni and third party organisations as part of its daily operation, and shall take all reasonable steps to do so in accordance with this Policy.

Data Protection Officer

The school has appointed a Data Protection Officer in the form of a data coordinator, who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998, The Freedom of Information Act 2000 and the Protection of Freedoms Act 2012. The New School Rome also recognises The General Data Protection Regulation (GDPR) (EU) 2016/679 which commences on 25th May 2018. We are required to appoint a Data Protection Officer (DPO). Our DPO is Catherine Logan, and she can be contacted at catherinelogan@newschoolrome.com

The Principles

The New School Rome shall so far as is reasonably practicable comply with the following Data Protection Principles (the Principles) contained within the GDPR to ensure all data is:-

- Processed lawfully, fairly and transparently
- Collected for specified and legitimate purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights, and in a secure manner

Personal Data

Personal data covers both facts and opinions about an individual where that data identifies an individual. It may, for example, include information necessary for employment such as a member of staff's name and address and details for payment of salary. Or it may include a student's attendance record and examination results. Personal data may also include sensitive personal data as defined in the GDPR, such as medical history or special educational need.

Processing of Data

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. 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 appropriate consent.

Students consent to process their data and disclose it to parents is implicit when they reach the age of 18. If a student wishes to revoke or change consent they must agree a specific agreement on how their data is to be processed with the data processor.

Right of Access to Data

Data subjects have the right of access to information held by the school, subject to the provisions of the aforementioned GDPR. Any data subject wishing to access their personal data should put their request in writing to the school's Data Protection Officer. The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within

30 days for access to records. The information will be imparted to the data subject as soon as is reasonably possible after it has come to the School's attention.

Accuracy

The New School Rome will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

Data Security

The New School Rome will take appropriate technical and organisational steps to ensure the security of personal data. All staff will be made aware of this policy and their duties under the GDPR.

The school and therefore all staff and students are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite. Other personal data may be for publication or limited publication within the School, therefore having a lower requirement for data security.

CCTV

The New School Rome owns and operates a CCTV network for the purposes of crime prevention and detection, and Safeguarding. The CCTV serves as a 'live feed' and none of the images or video are recorded.

Third parties

The New School Rome must ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites etc. are compliant with this policy and the relevant GDPR-related legislation.

Secure Destruction

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.

Retention of Data

The School may retain data for differing periods of time for different purposes as required by statute or best practices. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

The School may store some data such as registers, photographs, exam results, achievements, books and works etc. indefinitely in its archive. Data subjects have the right to request access to this data, and to request that it is deleted or otherwise disposed of.

THE NEW SCHOOL ROME