

The American School in London

Data Protection Policy

The current version of any policy, procedure, protocol or guideline is the version held on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.

Responsible party	Director of Technology
Approved by	Board of Trustees
Approval date	October 2024

Data Protection Policy

Introduction

The American School in London Educational Trust Limited (data controller) maintains certain information (including personal and sensitive personal data) about its employees, students, parents, alumni and other community members, to allow it to communicate effectively with its community, to monitor employee and student achievement, and to ensure safety at the School. It is also necessary to process information so that employees can be recruited and paid; courses can be organized; a high standard of teaching and learning can be delivered, and legal obligations to funding bodies and government departments can be observed.

Purpose and scope of this Data Protection Policy

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the UK Data Protection Act 2018, and other related legislation. It applies to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically. This policy applies to the personal data of all current, former and prospective students, parents, employees, trustees, volunteers and others working on behalf of the School. All employees, contractors, substitute teachers, athletics coaches, casual workers, trustees, temps and volunteers and others working on behalf of the School involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities and adhere to these guidelines.

Personal information

The American School in London (ASL) and individuals working on the School's behalf have access to a wide range of personal and sensitive data. The data may be held in a digital format or on paper records as part of a filing system. Personal data may be defined as any combination of data items that identifies a living individual and provides specific information about him/her, his/her family life, or personal circumstances. This includes:

- Personal information about members of the school community, including students, employees, parents or guardians, e.g., names, addresses, contact details, legal guardianship contact details, health records, disciplinary records, etc.
- Curricular or academic data, e.g., class lists, student progress records, reports, references
- Professional records, e.g., employment history, taxation and national insurance records, appraisal records and references
- Any data held visually in photographs or video clips (including CCTV) or as sound recordings
- Any expression of opinion about an individual kept on a school file or system, or any indication of the school's or someone else's intentions towards an individual
- Any other information that might be disclosed by parents or guardians, or by other agencies working with families or employees.

Data protection principles

The UK Data Protection Act 2018 establishes seven enforceable principles that must be adhered to at all times:

1. Personal data shall be processed lawfully, fairly and in a transparent manner (lawfulness, fairness and transparency);
2. Personal data shall be collected for specified, explicit and legitimate purposes, and not further processed in a manner that is incompatible with those purposes (purpose limitation);
3. Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimization);
4. Personal data shall be accurate and, where necessary, kept up to date (accuracy);
5. Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (storage limitation);
6. Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing, and against accidental loss, destruction or damage, using appropriate technical or organizational measures (integrity and confidentiality/security).
7. The American School in London shall be responsible for, and be able to demonstrate compliance with each of the data protection principles above.

ASL and all employees and volunteers who process or use personal information must ensure that they follow these principles at all times. In order to ensure that this happens, the School has developed this Data Protection Policy. Any breach of this policy by employees may result in disciplinary action.

A set of privacy notices on our website (asl.org) set out the bases on which ASL will process personal and special category data collected from data subjects, or that is provided to us by the data subjects or other sources. This policy does not form part of any employee's contract, although it forms part of the policies accepted as a condition of employment, and may be amended at any time.

Policy statements and responsibilities

Our school is committed to maintaining the data protection principles at all times. Therefore, we will:

- Maintain our registration as a data controller with the Information Commissioner's Office (ICO) detailing the information held and its use;
- Ensure that there are clear, fair processing notices (i.e., privacy notices) wherever we collect data;
- Periodically check the quality and the accuracy of the information held;

- Ensure that information is not retained for longer than is necessary by following a data retention schedule;
- Ensure that obsolete information is destroyed and that it is done so appropriately and securely;
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorized disclosure, irrespective of the format in which it is recorded;
- Ensure our employees and volunteers are aware of and understand policies and procedures that address the handling of personal data;
- Share information with third parties only if necessary and when it is legally appropriate to do so;
- Establish procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests;
- Maintain detailed records of data processing.

ASL takes all appropriate measures, technical and organizational, to ensure the security of individuals' data from loss, harm or unauthorized access.

Privacy notices

In order to comply with the fair processing requirements of the UK Data Protection Act 2018, ASL will inform employees and parents or guardians of all students and prospective students—and where appropriate the students themselves—of the data it collects, processes and holds; the purposes for which the data is held; and the third parties to whom it may be passed. These privacy notices will be passed to parents or guardians through the school's website and other electronic communications. Parents or guardians of prospective students will be provided with the privacy notice through the Admissions Portal. Employees will have access to relevant privacy notices through internal platforms and communications.