International School of London

Data Protection Policy

Date reviewed:
August 2025

To be reviewed:
August 2026

Mission statement

Since 1972, we have established a welcoming and inclusive community. Our diverse cultures and languages drive all our learning experiences.
We nurture creativity and curiosity to stimulate deep thinking. We foster insight, compassion and resilience to enable us to play a meaningful part in a changing world.

Vision statement

We celebrate our stories, our worth and our purpose to make a difference in a shared world

At the International School of London, we believe in:

Empowering students to maximise their learning opportunities and to fulfil their potential.
Actively integrating cultural diversity in the curriculum.
Creating inclusive, vibrant and innovative learning communities.
Offering a diverse and extensive international programme that supports personal, social and professional growth.

Data Protection Policy

Document Control

Data Protection and the General Data Protection Regulation (UK GDPR)

Date	Reviewed	Next Review Date	Data Protection Officer
21/05/2018	**26/09/2018** **01/10/2020** **09/03/2021** **01/08/2022** **01/08/2023** **01/08/2024** **01/08/2025**	**01/08/2026**	**Elina Aavikko**

We believe this policy should be a working document that is fit for purpose, represents the school ethos, enables consistency and quality across the school and is related to the following legislation:

- Equality Act 2010
- Data Protection Act 2018 (DPA 2018)
- UK General Data Protection Regulations 2021 (UK GDPR 2021)

The following documentation is also related to this policy:

- Equality Act 2010: Advice for Schools (DfE)
- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)
- Guide to the UK General Data Protection Regulation (UK GDPR) - Information Commissioner's Office
- We are aware that the UK General Data Protection Regulations 2021 (UK GDPR 2021) has entirely replaced the EU General Data Protection Regulation (GDPR) by making changes to data protection rules and regulations that school, academies and other educations establishments adhere to under the UK GDPR. The principal aim of the UK GDPR is to strengthen and unify the safety and security of all data held within an organisation.

We have the duty to ensure that we comply with the UK GDPR and consider the impact it has on this school and ensure policies and procedures are in place.

We believe that we comply with the UK GDPR. We understand that under the UK GDPR:

- data management is strengthened and unified.
- it is illegal not to have a formal contract or service level agreement with a chosen data processor.
- the data processor must be UK GDPR compliant.
- there are penalties for non-compliance with the UK GDPR;
- data breaches must be reported within 72 hours.
- individuals have greater control over their personal data.

We are committed to the protection of all personal and sensitive data for which we hold responsibility as the Data Controller. We believe the handling of such data is in line with the data protection principles and that access to such data does not breach the rights of the individuals to who it relates.

We acknowledge the UK GDPR's definition of personal data as 'information that relates to an identified or identifiable individual' such as name, identification number, location data or online identifier. It applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria.

The UK GDPR refers to sensitive personal data as ‘special category data’, which includes:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;
- personal data revealing religious of philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person’s sex life;
- data concerning a person’s sexual orientation.

At all times, we ensure the principles of the DPA and UK GDPR are applied and that all data is:

- processed lawfully, fairly and in transparent manner;
- collected for specific, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- sufficient, appropriate and not excessive in relation to the precise purpose;
- accurate and kept up to date;
- not kept for longer than necessary;
- processed securely by means of 'appropriate technical and organisational measures';
- protected against unlawful processing, accidental loss, destruction or damage.

We have the responsibility to ensure that all changes to data protection legislation are monitored and implemented in order to remain compliant with all requirements. All school personnel will attend training in order to be made aware of data protection policies and legal requirements. All contracted service providers will also be notified of our data protection policies and legal requirements.

All our data processing activities are registered with the Information Commissioner's Office (ICO). The ICO is notified of any changes to the type of data processing activities being undertaken and the register will be amended accordingly.

We are aware that the UK GDPR places great emphasis on accountability and therefore the Data Protection Officer will keep up-to-date documentation of all data protection activities.

We all have a responsibility to ensure equality permeates in to all aspects of school life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this school to feel safe, secure, valued and of equal worth.

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this school.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that is connected with this policy.

Aims

- To strengthen and unify the safety and security of all data held within the school.
- To ensure the protection of all personal and sensitive data for which we hold responsibility as the Data Controller.
- To ensure the handling of all personal and sensitive data is in line with the data protection principles.
- To work with other schools and the local authority to share good practice in order to improve this policy.

Responsibility for the Policy and Procedure

Role of the Director

The Director has:

- the responsibility to comply with the legal requirements of the UK General Data Protection Regulation 2021;
- in accordance with the UK GDPR appointed a Data Protection Officer who has expert knowledge of data protection law and practices;
- the responsibility to ensure the DPO:

  - ☐ operates independently and is not dismissed or penalised for undertaking their role;
  - ☐ has adequate resources to meet their UK GDPR obligations;
  - ☐ keeps up-to-date documentation of all data protection activities.

- the responsibility to ensure data is processed in accordance with the wight principles of the Data Protection Act 1998:
- delegated powers and responsibilities to the Headteacher as 'Data Controller' for the school;
- delegated powers and responsibilities to the Headteacher to maintain an updated data protection system that fits the needs of the school and complies with the UK GDPR;
- delegated powers and responsibilities to the Headteacher to ensure all school personnel and stakeholders are aware of and comply with this policy;
- responsibility for ensuring that the school complies with all equalities legislation;
- Nominated a designated Equalities governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- responsibility for ensuring funding is in place to support this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- responsibility for ensuring all policies are made available to parents;
- Director to:
  - ☐ visit the school regularly;
  - ☐ work closely with the Headteacher;
  - ☐ ensure this policy and other linked policies are up to date;
  - ☐ ensure that everyone connected with the school is aware of this policy;
  - ☐ attend training related to this policy.

- responsibility for the effective implementation, monitoring and evaluation of this policy.

Role of the Headteacher

The Headteacher will:

- act as 'Data Controller' for the school;
- ensure the UK General Data Protection Regulation is implemented in accordance with the advice from the Information Commissioner's Office:

☐ **Awareness**

- To organise awareness training in order to inform all school personnel and governors:

  - that data law has changed to UK GDPR;
  - to appreciate the impact it has on the school;
  - how the impact will affect the school;
  - by identifying areas that could cause compliance problems under the UK GDPR.

- To hold refresher training for all school personnel and governors when necessary.

☐ **Information we hold**

- To organise an information audit of data held on pupils, school personnel, parents, governors/trustees and suppliers.
- The audit will be undertaken under the following headings:

  - The type of data.
  - How is the data collected?
  - How is it processed?
  - Where did it come from?
  - Where is it located?
  - How is it secured?
  - Who is it shared with?

☐ **Communicating Privacy Information**

- To review privacy notices and to undertake any necessary changes.

☐ **Individuals' Rights**

- To check current procedures to ensure they cover all the rights of individuals have including:

  - how to delete personal data; and
  - how to provide data electronically in a commonly used format.

☐ **Subject Access Requests**

- To update present procedures and to plan how to handle requests within the one month timescale and to provide any additional information.

☐ **Legal basis for protecting personal data**

- To review the various types of data processing that the school carries out and then identify and document the legal basis for carrying it out.

☐ **Consent**

- To review how the school seeks, obtains and records consent and consider any changes that are required.

☐ **Children**

- To 'start thinking about whether we need to put systems in place to verify individuals ages and to obtain parental or guardian consent for any data processing activity.'

☐ **Data breaches**

- To ensure the right procedures are in place to detect, report and investigate a personal data breach.

☐ **Data protection by design and data protection impact assessments**

- To consider when to implement the Privacy Impact Assessments.

☐ **Data Protection Officers**

- To have in place a designated Data Protection Officer to take responsibility for data protection compliance.
- To assess where this role sits within the school's structure and governance arrangements.

☐ **International**

- To determine (if the school operates internationally) under which data protection supervisory authority applies to the school.

- keep a detailed record of all data activities;
- ensure the school complies with the UK GDPR;
- work closely with the Data Protection Officer and the nominated governor;
- ensure the school complies with the eight data protection principles;
- ensure all data is processed fairly and lawfully;
- ensure security measures and confidential systems are in place to protect personal data and pupil records;
- ensure data is obtained for specific and lawful purposes;
- ensure data is adequate, relevant and not excessive;
- ensure all personal data is accurate and that inaccurate data is corrected or erased;
- ensure procedures are in place to deal with requests for access to personal data;
- ensure data is not kept longer than is necessary;
- ensure school personnel are aware of their rights;
- ensure school personnel are aware of their responsibilities;

- ensure a pupil's educational records will be made available to their parents or carers on receipt of a written request;
- ensure a Common Transfer File is sent when a pupil joins another school;
- make effective use of relevant research and information to improve this policy;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- monitor the effectiveness of this policy by speaking with pupils, school personnel, parents and governors;
- annually report to the Director on the success and development of this policy.

Role of the Data Protection Officer

The Data Protection Officer will:

- have expert knowledge of data protection law and practices;
- inform the school and school personnel about their obligations to comply with the UK GDPR and other data protection laws;
- ensure data management is strengthened and unified;
- monitor compliance with the UK GDPR and other data protection laws;
- manage internal data protection activities;
- ensure risk and impact assessments are conducted in accordance with ICO guidance;
- report data breaches within 72 hours;
- ensure individuals have greater control over their personal data;
- ensure that prior to the processing of an individual's data that:

    - ☐ the process is in line with ICO guidance;
    - ☐ the process is transparent;
    - ☐ the individual will be notified;
    - ☐ the notification is written in a form that is understandable to children;
    - ☐ when sharing an individual's data to a third party outside of school that details for the sharing are clearly defined within the notifications.

- share an individual's data where it is a legal requirement to provide such information;
- process all written subject access requests from individuals within 30 days of receiving them;
- have in place a formal contract or service level agreement with a chosen data processor who is UK GDPR compliant;
- ensure the secure disposal of redundant data and IT hardware holding data in compliance with ICO guidance;
- train school personnel;
- conduct audits;
- be the first point of contact for supervisory authorities and for individuals whose data is processed;
- keep up-to-date documentation of all data protection activities;
- work closely with the Headteacher and nominated governor;
- periodically report to the Headteacher and to the Director;
- annually report to the Director on the success and development of this policy.

Role of School Personnel

School personnel will:

- attend data protection awareness training;
- comply with all aspects of this policy;
- be aware of all other linked policies.

Role of Parents/Carers

Parents/carers will:

- be invited to attend data protection awareness training;
- comply with all aspects of this policy;
- be aware of all other linked policies.

Training

All school personnel:

- have equal chances of training, career development and promotion
- receive training on this policy on induction which specifically covers:

  - ☐ UK General Data Protection Regulation
  - ☐ Data Protection Act 2018
  - ☐ Freedom of Information 2000
  - ☐ Access to Personal Records
  - ☐ E-safety
  - ☐ Grievance Procedure
  - ☐ Equality

- receive periodic training so that they are kept up to date with new information
- receive equal opportunities training on induction in order to improve their understanding of the Equality Act 2010 and its implications

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Monitoring the Implementation and Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the Data Protection Officer, the Headteacher and the nominated governor.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Director for further discussion and endorsement.

Headteacher:	Richard Parker	**Date:**	16/08/2025

At ISL London, Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.