

## **Introduction**

The purpose of this policy document is to define the principles of Data Protection at the Ladies' College, Melrose and the Ladies' College Pre-Preparatory and to provide a framework which:

- promotes consistency in school planning and school practice.
- facilitates development and change.
- informs new staff, pupils, parents, governors and the wider community.

**This policy should be viewed in conjunction with all other policies.**

The Ladies' College, Melrose and the Ladies' College Pre-Preparatory handles a great deal of personal data about pupils and parents. This information is covered by the Data Protection (Bailiwick of Guernsey) Law 2001.

## **Principles**

The Ladies' College, Melrose and the Ladies' College Pre-Preparatory Department will comply with all Guernsey Data Protection legislation.

The first five Principles establish general standards of data quality. They specify that personal data must be:-

- Obtained fairly and lawfully
- Held only for specific and lawful purposes and not processed in any manner incompatible with those purposes
- Relevant, adequate and not excessive for that purpose
- Accurate and where necessary kept up to date
- Not kept for longer than necessary for the purposes registered

**Under Data Protection Law, subjects have the right;**

- To be informed, on request, of all the information held on them by a particular data controller.
- To prevent the processing of their data for the purposes of direct marketing.
- To compensation if they can show that they have been caused damage by a contravention of the law.
- To the removal or correction of any incorrect data about them.

When children are of primary school age, the parents or legal guardians of the child are able to uphold subject rights on behalf of the child.

## **Personal Data**

Covers both facts and opinions about an individual. This may include, but is not limited to

- names and addresses
- academic information, including test results and reports.
- admissions.
- attendance.
- references, job applications, appraisals, discussion documents relating to staff
- disciplinary issues.
- health information supplied by parents.
- special educational needs information.
- learning support information.
- records of accidents happening in school.

### **Data exempt from the Data Protection Act includes;**

- Data necessary for the prevention or detection of crime.
- Data needed to enable the College to exercise a right or obligation conferred or imposed by law upon the College.
- Data which identifies other individuals and may, in the view of the College, cause damage or distress.
- Pupil examination scripts.
- That which is a result of an exemption sought from the DPC (Data Protection Controller).

**Unless exempt, personal data will remain confidential** and will only be disclosed to a third party;

- After verifying the credentials of the third party.
- Obtaining the consent of the individual involved; in the case of a child, the parents or guardians.
- After consultation with a member of Melrose Senior Leadership Team

When a child registers for entry to, or enters, Melrose or the Ladies' College Pre-Preparatory, the parents or guardians are asked to provide details to be kept on file by The Ladies' College. Such information includes;

- Contact details and other details concerning family, attendance, special educational needs and relevant medical history.
- Records to support teaching and learning; to record educational progress; pastoral care and data to be used to assess the school's overall progress.

Pupils have a general right of access to personal information held about them. All rights under the Data Protection Law rest with the child once she is able to understand these rights. In practice, this is normally taken to be 12 years of age but it can be more or less. Parents or guardians who wish to have access to personal data held about their child can submit a request to the school, either verbally or in writing. The school is allowed to charge for supplying the information but the charge cannot exceed £10.00. The school has up to 60 days to provide the information following a request. This information

will be provided in hard copy format and in a sealed envelope.

The College from time to time may make use of personal data relating to pupils, their parents or guardians in the following ways:-

- Photographic images of pupils will be used in College publications (including but not limited to the Ilex; the prospectus; handbooks and monthly newsletters); on the College website ([www.ladiescollege.com](http://www.ladiescollege.com)) and in the Guernsey Press newspaper (including the Guernsey Press website [www.thisisguernsey.com](http://www.thisisguernsey.com)). Generally, no information other than the pupil's name and age is used. Images may also be used for fundraising, marketing and promotional purposes.
- From time to time girls may be asked to take part in other media events for promotional purposes and may be part of a local television or radio interview for a specific purpose. These media organisations, (including but not limited to BBC Guernsey, Island FM, Channel TV) may make use of photographic images for their own websites.
- Other personal data (including but not limited to home address, email address and date of birth) will be used for fundraising, marketing or promotional purposes and to maintain relationships with pupils and past pupils of the College. Data may be shared between the College and any organisation, association, club or society set up for the purpose of establishing or maintaining contact with Alumnae for fundraising, marketing and/or promotional purposes and/or for the general benefit of the school.
- All parents and guardians are asked to sign a Data Protection agreement form when enrolled at The Ladies' College. Should you wish to object to or limit such use of data and/or images, please notify the Head Teacher, Mrs Ozanne, in writing.
- There are occasions at school events, when parents may film / photograph their own daughter and unavoidably other pupils. The school requests that these images remain for personal use and photographs that include other pupils should not be put on social media.