

## **Privacy / Data / General Data Protection (GDPR) policy**

The College is required to process relevant personal data regarding members of staff, volunteers, applicants, parents, pupils, students and their siblings, alumni and customers as part of its operation and shall take all reasonable steps to do so in accordance with this policy.

The College has always had responsibility for the collecting, storing and appropriate sharing of data. GDPR, 25 May 2018, imposes new requirements and the detail below seeks to clarify which data is held in College, alongside the processes which are carried out to ensure that requirements for consent, storage, sharing and destruction are clear.

### **Data Protection Officer**

The College has appointed the Bursar as the Data Protection Officer and the Network Manager has key practical responsibility for the storage of personal data. They 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 Protections of Freedoms Act 2012 are also relevant to parts of this policy.

The College recognises The General Data Protection Regulation (GDPR) (Regulation (EU) 2016, adopted 27 April 2016, the two year transition period and the application date of 25 May 2018 and the Data Protection Bailiwick of Guernsey) Law, 2017.

The College will comply with the Data Protection Laws to ensure all data collected is:-

- Adequate, relevant and not excessive
- Processed in accordance with the subject's rights
- Verified for accuracy (annually)
- Amended with relevant changes
- Processed for lawful purpose
- Not kept for longer than necessary
- Not shared without consent
- Secure (and College being responsible and accountable to an individual or group, were there to be a breach)
- Not transferred to other countries or third parties, without adequate protection

### **Definitions**

The College is The Ladies' College, Guernsey  
Parental consent includes consent of a guardian

## **Personal data**

Personal data covers facts and opinions about an individual where the data identifies an individual or is identifiable to an individual.

### **Processing of personal data**

Personal data is held by the College to achieve its goals of providing an education to each child. It is held securely and is not made available to any third party without prior consent, with the exception of our duty to share with the police and safeguarding, external agencies.

We ask you to verify your personal details annually and will amend any inaccuracies or changes when the detail is returned.

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment and is of legitimate interest to the core business of educating young people. 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.

All pupils, students and adults voluntarily share personal data with College as a result of their application to be part of the organisation. This is treated in the strictest confidence. Pupil, student and parental details are stored in Integris, which is password protected and adult employee information is stored securely within a password protected spreadsheet. This data is held as part of the **legitimate interest** of the College in meeting its statutory responsibility and would include sharing data with Elizabeth College or external agencies.

The Registrar and the Principal's PA have access to these databases as editors of the detail. Restricted access is available to colleagues as appropriate to their roles and responsibilities and all access is through password protection.

All parents, students and employees are asked to update their personal details and consent annually. See appendices.

Details about an individual student will be stored until the student is 25 years old. After this time only their name, dates of attendance and public examination results will be held on Integris, alongside the parents last known contact email and address.

Safeguarding details will be held securely for 50 years and should a student move schools and detail be passed on, a record of this transfer and detail shared will be kept securely for 50 years. For colleagues, employment dates, the last reference, payroll data and the last appraisal will be stored for 7 years. All other details will be destroyed at the end of the year following the year that the colleague left the College.

For visitors and suppliers, building access logs will be kept until the end of the following year, i.e. Visitors in July 2017 details will be kept until September 2018, so a full academic year will have passed.

## **Sensitive category data (Sensitive personal data)**

Sensitive category data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings, which College may, from time to time be required to process. (It also includes biometrics and genetics, which is not currently applicable to The Ladies' College).

## **Rights of access to information**

Individuals have the right to access information held by the College. All requests should be made in writing to the Principal. The College will endeavour to respond to any such requests as soon as is reasonably practical and in any event, within 1 calendar month for access to records and 21 days to provide a reply to an access for information request. (We currently have an external query pending linked to the long summer break, which may make this unachievable if this is requested in this period of time.)

## **Exemptions**

Certain data is exempted from the provisions of the Data Protection Law which includes the following:

- National security and the prevention or detection of a crime
- The assessment of any duty or tax
- Where the processing is necessary to exercise a right or obligation conferred or imposed upon the College, including Safeguarding and prevention of terrorism and radicalisation

## **Accuracy**

The College will endeavour to ensure that all personal data is accurate and individuals are asked to update the College with any changes. Inaccurate information should be erased, unless the records are in the interests of all parties to which they apply.

## **Enforcement**

If an individual believes that the College has failed to comply with this policy or acted otherwise than in accordance with the Data Protection Law, the Grievance and Disciplinary policy should be used, as well as ensuring that the Principal, Bursar and Data Protection Officer are notified.

## **Data Security**

The College will take appropriate technical and organisational steps to ensure the security of personal data.

All colleagues and older students (Upper Four upwards) will be made aware of this policy and their duties.

The College and therefore all colleagues, pupils 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 and unauthorised processing of personal data, and against the accidental loss, or damage to 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 off site. Other personal data may be for publication or limited publication within the College, therefore having a lower requirement for data security.

Attention is also drawn to the Acceptable Use Policy, which provides more specific information on digital data protection within the ICT policy, and best practice guides that are published and updated.

### **External Processors**

The College will ensure that data processed by external processors, for example, service providers, Cloud services including storage are compliant with this policy.

### **Secure destruction**

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

### **Retention of data**

The College may retain data for differing periods of time for different purposes as required by statute or best practice.

The College may store some data such as registers, photographs, exam results, achievements, books and work etc. indefinitely in its archive.

### **Right to erasure**

All requests for erasure must be presented in writing to the Principal, who will ensure that the information is erased, as well as communicating the detail which may be still be held by the College for the individual, as outlined above. A record will be kept about which data has been destroyed.

We reserve the right to hold all detail that links to results, safeguarding and accounting.

### **Consent**

Consent documents are attached in the appendices and will be amended and updated annually.

- Students
- Parents

### **Colleague devices**

Colleagues must not hold student or colleague personal data, unless it is encrypted. The use of an encrypted USB stick is recommended for data which needs to be accessible to colleagues e.g. during a trip and a College phone, which is password protected, is to be used. If colleagues store colleagues personal contact numbers on their personal device, this must be password protected. This detail is required for emergency contact / school closure communication.

The use of Sharepoint and One drive are the recommended platforms for ensuring that personal data is stored securely and can only be accessed by the user / defined users.

Colleagues must not use private devices to download attributable data. Neither should they work in public or access sensitive data in non-secure locations.

Any infringement will be followed up using existing disciplinary procedures.

### **Other Matters**

Microsoft have produced a retention policy of 90 days for student users once they have been moved to the former role. Sixth Form leavers will need to supply their private email addresses so that universities can still contact them. For staff this will be when they are moved to the former role. All emails and OneDrive data would be deleted at this stage. Documentation for leavers will reflect this.

No colleague should hold any personal student data on any school device which is NOT encrypted.

Acceptable options available for colleagues:

- Ensure that any stored data is in the cloud on Sharepoint or One drive, which is recommended.
- All devices issued to colleagues have the hard drives encrypted. Outside bodies such as CAMHS use EGRESS for encryption.

### **Screen saver/Login policies**

Colleagues **MUST** ensure that screens are locked or they have logged off a device which is left in a room.

Passwords should not be shared and if this is necessary for practical reasons, then the password must then be changed immediately.

Colleagues are reminded to use complex passwords that include a mixture of upper and lower case, numbers and symbols. Passwords must not be written down where they might be visible to others.

Colleagues will be asked to sign an annual declaration to show that they are aware of this policy and the consequences of any breaches.

The Grievance and Disciplinary policy will be followed for all breaches of this security requirement.

### **Fundraising**

Information in respect of donors and other friends of the College is held on a database. Consent for information to be stored on such a database is sought:

- 1) by writing to all existing donors to seek their consent
- 2) by seeking consent (or otherwise) on gift forms going forwards

### **PTAs/The Ladies' College Guild**

The PTAs and The Ladies' College Guild seek consent directly from their members and alumni in terms of the data they have stored. This data is not shared with College or any third party without prior consent being given.

### **Sharing data with external agencies**

Data will be shared with external agencies, either at the request of parents, students or the external agencies themselves in terms of the safeguarding of young people.

All such data will be shared directly from the Principal's Office.

### **Sharing data with parents**

General information is shared with parents via Group Call. Information that is student specific is sent to parents via email using the address supplied by them.

### **Sharing sensitive data**

If information to be sent contains sensitive data, the data should be encrypted, redacted or the personal identifier held separately to the data so it cannot be attributed.

### **Student consent**

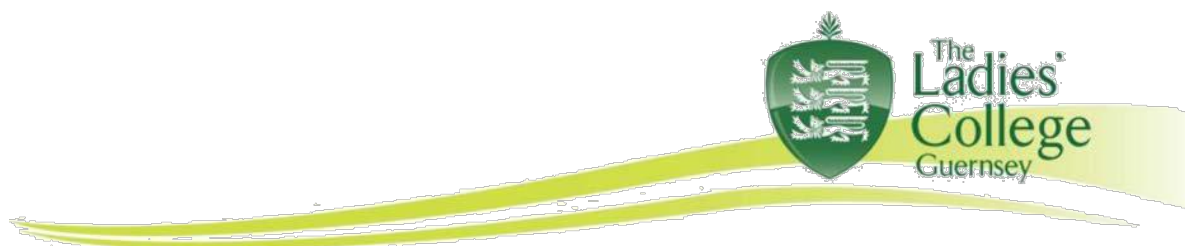
All students from Upper Four (Year 9) are asked to sign consent annually for data to be held or used to support their education, where it is not held as part of our legitimate interest or as part of our contractual obligation.

### **Recording consent**

Consent from parents and students is recorded in Integris.

### **Data Protection breaches**

Any potential breach will be shared with the Principal and advice sought for the sake of clarity from within the island, in the first instance, should this need to be reported.



## **The Ladies' College Privacy / Data / GDPR Policy**

### **Colleagues**

#### **TO GO INTO STAFF HANDBOOK**

The College holds personal data about colleagues which links to their Contract of Employment with the College.

The data we hold is as follows:

As part of the registration of an employee at the College

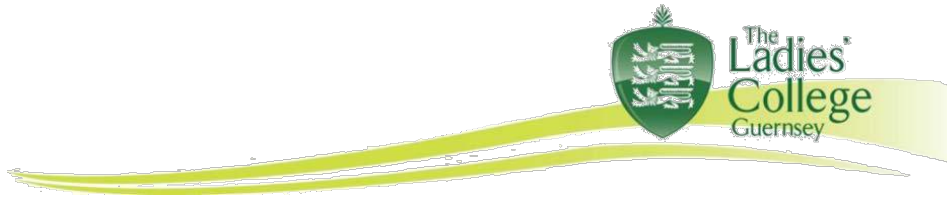
- Application Form (detailing CV information and employment history) and notes taken as part of interview process
- Name, date of birth, contact details and colleague photographs
- Emergency contact details
- Medical declarations and copies of references (requested at time of employee registration)
- Record of DBS and other safeguarding checks completed
- Bank, pension and salary information (for payroll purposes)
- Right to Work/Housing Licence/Employment permit information
- Vehicle details (for parking purposes)

As part of general record keeping

- Performance Management information (appraisal and training records)
- Records relating to absence (sickness, compassionate leave etc)
- Records relating to any grievance, disciplinary or capability issues
- Records of 1:1 meetings attended by employees
- Copies of references provided for employees to other organisations
- Any other information which is willingly shared by an employee which it is felt prudent to retain for future reference.

We ask you to be aware that we have the facility to monitor individual access and use of websites and various search engines which are accessed using College systems.

Please note that our staff database is password protected within the system and only accessible to key users to allow them to fulfil our contractual obligations



## **The Ladies' College Privacy / Data / GDPR Policy**

### **Parental Consent 2018/2019**

This form and the personal data held by us must be verified annually by parents/guardians of students of The Ladies' College.

#### **Why does this form need to be completed?**

The College is collecting the information contained on this form in order to meet our statutory responsibilities for the education of children. Whilst some of the data we hold is of legitimate interest, such as web services (OneDrive, SharePoint, CEM Durham) there are other areas where we must seek your active consent. Accordingly, we need to establish the following information about you and your daughter to comply with these responsibilities under the Education Act 1996, the School Standard and Framework Act 1998, the Data Protection Act of 1998, the Data Protection (Bailiwick of Guernsey) Law, 2017 and the replacement GDPR legislation, May 2018, where we are required to ask for your active consent.

The personal information that you provide enables us to fulfil our contractual obligations in providing information about your daughter's progress and attainment and to inform you of events and activities.

#### **What information is being collected?**

The information we hold about you and your daughter must be accurate. Each year we ask that you inform us of any changes and agree to the detail that we hold. This information will be used to support us in meeting your daughter's needs in school (and linked with Elizabeth College as appropriate). It will be shared with external agencies, including the Education Services and those who have the duty to safeguard young people in our community.

In addition to the details on this form, your daughter's internal and external examination results are processed in order for us to monitor progress, provide advice concerning subject or course choices and produce value added statistics that help the College monitor its own performance.

We also need the active consent from your daughter once she has reached the age of 13 for the items listed overleaf, linked to her rights under the new GDPR. (We collect this at the start of Lower Five to process all changes for the year group, unless requested otherwise by you or your daughter).

For some information we are required by Data Protection Law to obtain specific and informed permission. These appear overleaf.



**Your declaration**

I understand that the information that the Ladies' College will use the information I am supplying to enable my daughter(s) to be educated at The Ladies' College. If I become aware that the College is holding inaccurate personal information, I have the right to have this information corrected or removed.

**(Should the agreement be different amongst your daughters, please submit separate forms).**

<b>I also give my informed consent to the College to:</b>	<b>PLEASE TICK ALL THAT APPLY</b>
administer first aid to my daughter	
include my daughter in College trips/ activities <u>on island</u> , as part of the taught curriculum. (All other trips have specific informed consent requirements).	
include my daughter in College trips/ activities <u>on island</u> as part of the wider curriculum. (All other trips have specific informed consent requirements).	
include my daughter's picture in various school publications and on social media	
name my daughter in external publications:	
College website (first name only)	
Social media (first name only)	
ILex (full name)	
Newspapers (full name)	
Other publications linked to College	
<b>I also understand that the information I supply may be shared with the Education Services and other agencies involved with the health and welfare of children and young people, as a result of legitimate interest</b>	

We ask you to be aware that we have the facility to monitor / log individual access and use of websites and various search engines which are accessed using College systems.

<b>Name of daughter</b>	<b>Year group</b>

Signed: ..... Parent/Guardian\* Date: .....

Please print:.....

Signed: ..... Parent/Guardian\* Date: .....

Please print:.....

\*We ask that where applicable both parents sign this form. For families where parents do not live in the same home, separate forms will be required.

### **Changes to our Privacy / Data / GDPR Policy**

We keep our Privacy / Data / GDPR Policy under regular review and updates will be available on our web site.

### **How to contact us**

Please contact us if you have any question about our Privacy / Data / GDPR Policy or information we hold about you or your daughter.

By email: [registrar@ladiescollege.ac.gg](mailto:registrar@ladiescollege.ac.gg)

By phone: 01481 721602

Or write to: The Registrar, The Ladies' College, Les Gravées, St. Peter Port, Guernsey, GY1 1RW



## **The Ladies' College Privacy / Data / GDPR Policy**

### **Upper Four, Lower and Upper Five and Sixth Form Student Consent 2018/2019**

This form and the personal data held by us must be verified annually by students of The Ladies' College, Sixth Form and students who have reached the age of 13.

#### **Why does this form need to be completed?**

The College is collecting the information contained on this form in order to meet our statutory responsibilities for the education of children. Whilst some of the data we hold is of legitimate interest, such as web services (OneDrive, SharePoint, CEM Durham) and needed by us to provide education to young people, there are other areas where we must seek your active consent. Accordingly, we need to establish the following information about you to comply with these responsibilities under the Education Act 1996, the School Standard and Framework Act 1998, the Data Protection Act of 1998, the Data Protection (Bailiwick of Guernsey) Law, 2017 and the replacement GDPR legislation, May 2018, where we are required to ask for your active consent.

The personal information that you provide enables us to fulfil our contractual obligations in providing information about your progress and attainment and to inform you of events and activities.

#### **What information is being collected?**

The information we hold about you must be accurate. Each year we ask that you inform us of any changes and agree to the detail that we hold. This information will be used to support us in meeting your needs in school (and linked with Elizabeth College as appropriate). It will be shared with external agencies, including the Education Services and those who have the duty to safeguard young people in our community or, as requested by you, to support you as you finish your education at The Ladies' College.

In addition to the details on this form, your internal and external examination results are processed in order for us to monitor progress, provide advice concerning subject or course choices and produce value added statistics that help the College monitor its own performance.

The College is collecting information about you so that we can better help, advise and support you. We have to share some of this information as part of our legal responsibilities. We also need the active consent from you, once she has reached the age of 13, for the items listed overleaf, linked to your rights under the new GDPR. This is collected at the start of the year in Upper Four (Year 9).

For some information we are required by Data Protection Law to obtain specific and informed permission. These appear overleaf.

## Your declaration

I understand that the information which I am supplying will enable me to be educated at The Ladies' College. If I become aware that the College is holding inaccurate personal information, I have the right to have this information corrected or removed.

<b>I give my informed consent for College to:</b>	<b>PLEASE TICK ALL THAT APPLY</b>
administer first aid to me	
include me in College trips/ activities on island as part of the taught curriculum	
include me in College trips/ activities on island as part of the wider curriculum	
include my picture in various school publications and on social media name me in external publications:	
College website (first name only)	
Social media (first name only)	
Ilex (full name)	
Newspapers (full name)	
Other publications linked to College	
<b>I also understand that the information I supply may be shared with the Education Services and other agencies involved with the health and welfare of children and young people as a result of legitimate interest.</b>	

We ask you to be aware that we have the facility to monitor / log individual access and use of websites and various search engines which are accessed using College systems.

Signed: .....Student

Date: .....

Please print:.....

## Changes to our Privacy / Data / GDPR Policy

We keep our Privacy / Data / GDPR Policy under regular review and updates will be available on our web site. This policy was reviewed 12/09/2017.

## How to contact us

Please contact us if you have any question about our Privacy Policy or information we hold about you.

By email: [registrar@ladiescollege.ac.gg](mailto:registrar@ladiescollege.ac.gg)

By phone: 01481 721602

Or write to: The Registrar, The Ladies' College, Les Gravées, St. Peter Port, Guernsey, GY1 1RW