



ΕΛΛΗΝΟΡΘΟΔΟΞΗ ΚΟΙΝΟΤΗΤΑ ΑΓΙΟΥ ΠΑΝΤΕΛΗΜΟΝΟΣ  
**ΕΛΛΗΝΙΚΟ ΚΟΛΕΓΙΟ ΑΓΙΟΥ ΠΑΝΤΕΛΗΜΟΝΟΣ**

**ST. PANTELEIMON HELLENIC COLLEGE**

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# Data Protection Policy

## GDPR



Date: 04/06/20

Approved by the Headteacher

Date of next review: 04/06/21

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# **1. What is the purpose of this policy**

Under data protection legislation, St Panteleimon Hellenic College is the data controller of the personal information we hold. The Headteacher is the member of staff responsible regarding the protection of data.

St Panteleimon Hellenic school is required to keep and process personal information about its pupils, families and staff in accordance with its legal obligations. This information will be processed in accordance with the EU General Data Protection Regulation 2018 (GDPR).

St Panteleimon Hellenic College may from time to time be required to share personal information with other SLT members, organisations, including the Local Authority (LA), Department for Education (DfE,) other schools, relevant bodies and specialist professionals who provide services to St Panteleimon Hellenic College.

This policy will outline the legal framework, practices and processes used in the St Panteleimon Hellenic College with regards to the proper collection, processing and retention of personal data we hold.

This document is a working document and will be regularly updated, to reflect changes in the working practices of the St Panteleimon Hellenic College. Please ensure that you access the most recent version of this document either through the website or by contacting the St Panteleimon Hellenic College.

# **2. Why do we collect and use data?**

St Panteleimon Hellenic College is required by law to comply with legislation including, but not limited to, the following:

The General Data Protection Regulation 2018 (GDPR)

St Panteleimon Hellenic College uses the information it holds in order to:

- Support Safe Recruitment procedures
- Be compliant with Safeguarding regulations
- Support the teaching and learning of pupils and staff.
- Monitor and report on progress and achievement
- Provide appropriate care and safeguarding for pupils and staff
- Assess the quality of our service
- Comply with other legal obligations as laid out in our school policies or through government guidelines

### **3. What data is covered by this policy?**

St Panteleimon Hellenic College recognises the following categories of data which are collected and processed. This policy applies to both personal data held electronically and data stored in paper records in our filing systems. Personal data in electronic form are held in a separate external electronic memory bank exclusively used for the purposes of St Panteleimon Hellenic College.

Personal data in hard copy are locked away in a designated supervised location and accessible only by the Headteacher or members of the SLT under the supervision of the Headteacher.

Personal data is information that relates to an identifiable, living individual, this can include information relating to online identity such as usernames or IP addresses.

Sensitive personal data is defined as a special category of personal data (refer to GDPR Article 9). This can include the processing of genetic data, biometric data and data concerning health matters.

## 4. What are the key principles and lawful reasons used to process data?

St Panteleimon Hellenic College will ensure that all personal data is only ever collected, processed and stored according to the key principals identified in the GDPR to ensure that privacy and data security is embedded within the culture of the organisation at all levels. St Panteleimon Hellenic College recognises that personal data may only be processed lawfully, the lawful reasons used by the St Panteleimon Hellenic College are identified as follows:

To allow the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller to carry out the duties of the St Panteleimon Hellenic College.

To operate in accordance to Safe Recruitment guidelines

To operate in compliance with Safeguarding guidelines.

To protect the vital interests, health or wellbeing of an individual.

To comply with legal obligations as paid out in our policies or through government guidelines.

To deliver a contract, or to take steps required to enter in to a contract.

To undertake other legitimate interests pursued by the Data Controller or a third party

With the consent of the person concerned, which has been legally obtained.

## 5. What personal data is collected?

St Panteleimon Hellenic College can collect and process the following personal data relating to pupils or their families:

- Personal information — e.g. names, addresses, date of birth.
- Family contact details including further emergency contact details.
- Characteristics including ethnicity, language, nationality, country of birth, religion, and photographs for identification.
- Attendance information including absences and absence reasons.
- Assessment information including scores used to measure learning, development and progress.
- Medical history and information relevant to health & wellbeing such as allergy information.
- Information relating to identified Special Educational Need & Disability (SEND)
- Behavioural information including exclusions and incident reports.
- Safeguarding information relating to protecting the safety or best interest of children including care and social services data, legal or judicial communications and information supplied by related agencies.

St Panteleimon Hellenic College can collect and process the following personal data relating to its employees and governors:

- Personal information — e.g. names, addresses, date of birth.
- Characteristics including ethnicity, language, nationality, country of birth and photographs for identification.
- Attendance information including absences and absence reasons.
- Employment & Contractual information such as qualifications, criminal records checks, references, employment history, trade union membership, religion and financial data such as bank details & tax information.
- Medical history and information relevant to health & wellbeing such as disability or allergy information.

- Performance Management information such as appraisals or disciplinary records.
- Assessment records such as lesson observation records.

St Panteleimon Hellenic College can collect and process the following personal data relating to contractors and visitors:

- Personal information — e.g. names, addresses, date of birth and relevant medical information.
- Relevant characteristics including photographs for identification.
- Employment & Contractual information such as qualifications, criminal records checks, references, employment history, and financial data such as bank details & tax information.

## **6. What is meant by obtaining lawful consent?**

St Panteleimon Hellenic College may identify additional uses of your data, which may be of benefit to your child or the school community. Examples may include optional extra-curricular activities, events or fundraising.

## **7. Will personal data be shared?**

St Panteleimon Hellenic College will share personal data with local authorities and legal bodies who have the right by law to access these type of data. St Panteleimon Hellenic College may also share personal data with:

- Other schools , educational bodies and visiting education specialist professionals.
- The NHS and Healthcare professionals.
- Special Educational Needs (SEN) support professionals.
- Service suppliers such as finance, payroll, catering, payment processing and ICT
- Social and welfare services including the Police.



The information shared may include sensitive personal information such as information about health, special educational needs, or disabilities. This information is used to provide the correct services to support children, families or employees and is only shared on a strictly need to know basis in full compliance with individual's rights. St Panteleimon Hellenic College is required by law to check the identity and Criminal Records.

St Panteleimon Hellenic College will conduct checks using the Disclosure and Barring Service (DBS). In order to carry out these checks, it is required for **authorised** persons to share sensitive personal data with the DBS.

Personal Data will be processed by the DBS and the results of this processing provided to St Panteleimon Hellenic College. You may review the privacy notices provided by the DBS for further information on the gov.uk website.

## **8. How do we use photography and video?**

St Panteleimon Hellenic College recognises that the recording images of identifiable individuals is a form of processing personal information which must be carried out in line with data protection requirements.

## **9. Will personal data be published?**

St Panteleimon Hellenic College will not publish any personal data, including photos or images, in a public forum either online or in print without obtaining explicit consent in advance.

## **10. How long is personal data stored for?**

Personal data is not kept on a permanent basis and is only stored for as long as is necessary to fulfil its intended purpose. Personal data is deleted when it is no longer required. Some educational records relating to former pupils or employees of the school may be kept for an extended period for legal reasons, but also for example to enable the provision of references.

Paper documents will be securely disposed of e.g. shredded, and electronic data permanently erased once the data is no longer required.

## **11. Who is accountable for data protection?**

St Panteleimon Hellenic College designates the Headteacher as its representative with regards to data protection.

## **12. How is personal data processed and protected?**

St Panteleimon Hellenic College ensures appropriate technical measures and processes are in place to protect data and privacy of individuals.

## **13. What are your rights regarding your personal data?**

St Panteleimon Hellenic College recognises the rights of individuals with regards to our use of their personal data, a list of your rights are as follows:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

St Panteleimon Hellenic College will ensure that these rights are respected by ensuring that all our policies and processes regarding data processing and data storage are compatible with these rights.

In addition to the rights detailed above, individuals have further rights relating to the automated processing of their personal data.

St Panteleimon Hellenic College does not make use of any automated decision making in the processing of data, neither does it undertake automated profiling of individuals.

## **14. What happens when there is a breach of your privacy?**

St Panteleimon Hellenic College will use practical & technical measures to protect personal data from loss or any other unauthorised alteration, disclosure, or access.

In the event of a breach of privacy as described above the Headteacher will take the following action:

- Assess the nature of the personal data breach, including the categories of data concerned and approximate number of individuals and records affected
- Identify if the breach is likely to result in any risk to the rights and freedoms of individuals. Risk of the breach having a detrimental effect on individuals, and the need to notify the relevant supervisory authority, will be assessed on a case-by-case basis.
- Report all notifiable breaches to the Information Commissioners Office within 72 hours of the St Panteleimon Hellenic College becoming aware of it.
- If a breach is likely to result in a high risk to the rights and freedoms of an individual, St Panteleimon Hellenic College will notify those individuals concerned directly and without undue delay.

## **15. How do you request access to view your personal data?**

Under data protection legislation, any individual about whom St Panteleimon Hellenic College processes personal data (the Data Subject) has the right to request access to view the information that we hold about them. Requests for access to your personal information must be recorded in writing and address to the Headteacher.

## **16. How do you raise a concern about the way we process personal data?**

If you have a concern about the way we collect or use your personal data, we invite you to raise the matter with us in the first instance by speaking to the Headteacher.

## **17. When will this policy be updated?**

This policy will be reviewed at least once per year by St Panteleimon Hellenic College.

This policy is a working document and can be updated to reflect changes in the working practices of the St Panteleimon Hellenic College at any time.