The German Saturday School Croydon

Data Protection Policy

Introduction

In order to operate, The German Saturday School Croydon (the "School") needs to gather, store and use certain forms of information about individuals. These can include pupils, their parents/carers, employees and volunteers.

This policy explains how this data should be collected, stored and used in order to meet the School's data protection standards and comply with the General Data Protection Regulation (GDPR).

This policy ensures that the School:

- Protects the rights of its pupils, their parents/carers, staff and volunteers
- Complies with data protection law and follows good practice

Roles and responsibilities

Who and what does this policy apply to?

It applies to all those handling data on behalf of the School, e.g.:

- Members of the School's management team
- Members of staff
- Volunteers

It applies to all data that the School holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. birth dates, health information)

The School is the Data Controller and will determine what data is collected and how it is used. The School's management team are responsible for the secure, fair and transparent collection and use of data by the School. Everyone who has access to data as part of the School has a responsibility to ensure that they adhere to this policy. The School may use third party Data Processors to process data on its behalf. The School will ensure all Data Processors are compliant with GDPR.

Any questions relating to the collection or use of data should be directed to the management team at kontakt@dsscroydon.org.

Data protection principles

The School collects and processes personal information in order to be able to provide language education, to support and manage its staff and volunteers, and to maintain its own accounts and records. It will not share any of the information it holds with third parties without prior consent or unless required by law.

 A pupil's and their parent's/carer's personal details will be collected when they first request or declare an interest to join the School. Details will be used to contact them regarding their place at the School, to provide administrative information (e.g. fees) and information about activities of the School.

Sensitive information pertaining to a pupil's health will be collected upon them taking up their place at the School.

The name and contact details of staff or volunteers will be collected when they take up a
position and will be used to contact them regarding their role, administrative information and
School activities.

Further information, including criminal records information, may also be collected where lawful and necessary.

When collecting data, the School will always provide a privacy statement explaining why the data is required and what it will be used for.

The School will not collect or store more data than the minimum information required for its intended purpose.

The School will ask all parents/carers, staff and volunteers to check and update their/their child's data on a termly basis. Any individual will be able to update their data at any point by contacting the School management team in person or by sending an email to kontakt@dsscroydon.org.

The School will keep records no longer than is necessary in order to meet the intended use for which it was gathered. When the intended use is no longer applicable (e.g. when a child leaves the School or no longer wishes to take up an available place), the data will be deleted or destroyed within a reasonable period.

The School will ensure that data held will be kept securely.

- Electronically-held data will be held within a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically-held data will be safely stored at the home of a School management team.

Access to data will only be given to members of the School management team or members of staff where this is necessary for the running of the School.

The School will not transfer data to countries outside the European Economic Area (EEA), except via a third-party service provider who has confirmed that they have adequate protection for the individual's data privacy rights.

Individual's rights

Whenever the School collects data it will provide a privacy statement explaining why data is being collected and how it will be used.

Individuals can request to the see the data the School holds on them and confirmation on how it is being used. Requests should be made in writing to kontakt@dsscroydon.org. Requests will be complied with within four weeks, however, this may be extended to two months where requests are more complex or numerous.

Individuals can request that their data be updated at any time by emailing the management team at kontakt@dsscroydon.org. The School will request that parents/carers and staff check and update their data on a termly basis. Any requests for data to be updated will be processed within one month.

Individuals can request for all data held on them to be deleted or destroyed. The School will ensure that data is not held for longer than is reasonably necessary in relation to the purpose for which it was originally collected. If a request for deletion is made, the School will comply unless there is a legal requirement to keep the data.

Individuals are encouraged to raise any concerns regarding the collection and use of their data by contacting the School at kontakt@dsscroydon.org. The School will investigate any concerns raised and respond to the individual within 4 weeks.

Contact between families at the School

The School encourages communication between families and may share individual contact details with other families at the School for the following purposes provided prior consent is given:

- Individual class lists (containing names, mobile telephone numbers and email addresses) will be made available to all parents/carers of a child's class
- **Helpers list** (containing parents' names <u>only</u>) will be made available to all parents/carers

Parents/carers may request contact information of other parents/carers whose child is not in their own child's class, however, the School will only be able to pass on this information if consent is given.

Cookies on the School's website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

The School uses cookies on its website www.dsscroydon.org in order to monitor and record its activity. A pop-up box has been implemented on the website that will activate when a user first visits the website. This will allow the user to click to consent (or not) to continuing with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent).