



Data Protection Policy

Introduction

Ocean Lodge Independent School is required to process relevant personal data regarding pupils and their parents/carers as part of its operation and shall take all reasonable steps to do so in accordance with this policy. Processing may include obtaining, recording and holding, disclosing, destroying or otherwise using data. Throughout the policy any reference to pupils includes current, past or prospective pupils.

Policy Aims

- To ensure that Ocean Lodge Independent School adheres to the legislation relating to Data Protection.

Data Protection Controller

The appointed Data Protection Controller (DPC) is Amy Loines, Headteacher. The DPC 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 Principles

Ocean Lodge Independent School shall so far as is reasonably practicable comply with the Data Protection Principles contained in The Data Protection Act to ensure all data is:

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries without adequate protection.

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Personal Data

Personal data covers both facts and opinions about an individual. Ocean Lodge Independent School may process a wide range of personal data of their pupils, their parents (and or appropriate other) as part of its operation. This personal data may include (but is not limited to) names, addresses, academic, disciplinary, admissions and attendance records, references, examination scripts and marks.

Processing of Personal Data

Consent may be required for the processing of personal data unless the processing is necessary for the school to undertake its obligations to pupils and their parents (and or appropriate other). 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 the consent of the appropriate individual or under the terms of this policy.

Sensitive Personal Data

Ocean Lodge Independent School may from time to time be required to process sensitive personal data regarding a pupil, their parent (and or appropriate other). Sensitive personalised data includes medical information and data relating to religion, race or criminal records and proceedings. Where sensitive personal data is processed by the school the explicit consent of the appropriate individual will generally be required in writing.

Rights of Access

Individuals have a right of access to information held by the school. Any individual wishing to access their personalised data should put their request in writing to the DPC. Ocean Lodge Independent School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within forty days for access to records and 21 days to provide a reply to an access to information request.

Ocean Lodge Independent School is aware that certain data is exempt from a right of access under The Data Protection Act. This may include information which identifies other individuals, information which the school reasonably believes is likely

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to cause damage or distress, or information which is subject to legal professional privilege.

Whose rights

The rights under The Data Protection Act are the individual's to whom the data relates.

Exemptions

Certain data is exempt from the provision of The Data protection Act which includes the following:

- The prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the school.

The above are examples from The Data protection Act. Any further information on exemptions should be sought from the DPC.

Disclosure of Information

Ocean Lodge Independent School may receive requests from third parties to disclose personal data it holds about pupils, their parents (and or appropriate other). The school confirms that it will not generally disclose information unless the individual has given their consent or one of the specific exemptions under the Data Protection Act applies. However the school does intend to disclose such data as is necessary to third parties for the following purposes:

- To give a confidential reference relating to a pupil to any educational institution which it is proposed that the pupil may attend

- To publish the results of public examinations or other achievements of pupils of the school
- To disclose details of a pupil's medical condition where it is in the pupil's interest to do so, for example, for medical advice, insurance purposes or to organisers of school trips.

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Where the school receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure.

Use of Personal Information by the School

Ocean Lodge Independent School will from time to time make use of personal data relating to pupils, their parents (and or appropriate other) in the following ways:

- To make use of photographic images of pupils in school publications and on the school website; however the school will not publish photographs of individual pupils with their names on the school website without the express agreement of the appropriate individual
- For fundraising, marketing or promotional purposes and to maintain relationships with pupils of the school, including transferring information to any association, society or club set up for the purpose of establishing or maintaining contact with pupils.

Accuracy

Ocean Lodge Independent School will endeavour to ensure that all personal data held in relation to an individual is accurate. Individuals (or appropriate other) must notify the DPC of any changes to information held about them.

Security



Ocean Lodge Independent School will take reasonable steps to ensure that members of staff will only have access to personal data relating to pupils, their parents (and or appropriate other) where it is necessary for them to do so. All staff will be made aware of this policy and their duties under The Data Protection Act. The school will ensure that all personal information is held securely and is not accessible to unauthorised persons.

Enforcement

If an individual believes that Ocean Lodge Independent School has not complied with this policy or acted otherwise than in accordance with The Data Protection Act they should utilise the school complaints procedure and notify the DPC.

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To be read in-conjunction with:

- All policies

Proprietor signature.....

Date: 01/09/17

Reviewed Sept 17
Next review Sept 18