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Embassy International School Data Protection Policy

Data means all records kept concerning an individual – names, addresses, contact details, opinions written down, and information from which a person can be identified.

All data gathered by the Embassy International School should be subject to principles of good information handling:

- Fairly and lawfully processed (processing means 'obtaining, disclosing, recording, holding, using, erasing or destroying personal information')
- Processed for a specific purpose (this means that information can only be used for those specific purposes for which the Embassy International School gathered it). It cannot be given away or sold unless the subject has given express permission.
- Adequate, relevant and not excessive
- Accurate, and where necessary, kept up to date
- not kept longer than is necessary. For Embassy International School this means a period of 5 (five) years after the child has left school.
- Processed in line with the rights of the individual. People have a right to know what information is held about them.
- Kept secure (meaning backed up and protected from unauthorised access).

Embassy International School will not collect data concerning: political opinions, religious or similar beliefs, trade union membership, sexual life.

Staff will be trained in data protection policy and about data handling procedures.

In the interests of child protection the Embassy International School will collect and securely store information concerning:

- offences or alleged offences committed;
- proceedings relating to those offences or alleged offences.

Prior to processing any information the Embassy International School must be satisfied that the processing will fulfil at least one of these conditions:

1. The individual who the personal data is about has consented to the processing
2. The processing is necessary:
 - In relation to a contract which the individual has entered into; or
 - Because the individual has asked for something to be done so they can enter into a contract;

3. The processing is necessary because of a legal obligation that applies to Embassy International School (except an obligation imposed by a contract);
4. The processing is necessary to protect the individual's 'vital interests'. This condition only applies in cases of life and death, such as where a person's medical history is disclosed to a hospital A&E department treating them after a serious road accident;
5. The processing is necessary for administering justice, or for exercising statutory, governmental, or other public functions;
6. The processing is in accordance with a 'legitimate interests' (debt collection etc.).

Complaints about information held by the Embassy International School should be made through the school's established complaints procedures.

Request to see information held

Anyone has a right to see information the Embassy International School holds about them.

Procedure for processing a subject access request

1. Requests for information must be made in writing (this includes email) to the Head of School. If the initial request does not clearly identify the information required, then clarification will be sought.
2. The identity of the person making the request must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship to the child.

Evidence of identity can be established by requesting production of:

- nationally issued identity card
- passport
- driving licence
- utility bills with the current address Birth / Marriage certificate
- Credit Card or Mortgage statement

This list is not exhaustive.

3. Any individual has the right of access to information held about them. However with children up to the age of 16 a parent or guardian shall make the request on behalf of the child.
4. Charges:

Should the information requested be personal information that does not include any information contained within educational records the school can charge up to PLN50 to provide it.

If the information requested is only viewing of the educational record then this will be without charge.

5. The response time for subject access requests, once officially received, is 40 days (**not working or school days but calendar days, irrespective of school holiday periods**). However the 40 days will not commence until after receipt of fees or clarification of information sought.

Exemptions to provision of information

There are situations which allow exemptions concerning provision of some information; **therefore all information**

will be reviewed prior to disclosure. This review will be undertaken by the Head of School.

1. Third party information is that which has been provided by another, such as the Police, Local Authority, Health Care professional or another school. Before disclosing third party information consent should normally be obtained. There is still a need to adhere to the 40 day timescale.
2. Any information which may cause serious harm to the physical or mental health or emotional condition of the pupil or another should not be disclosed, nor should information that would reveal that the child is at risk of abuse, or information relating to court proceedings.
3. If there are concerns over the disclosure of information then additional advice will be sought.
4. Where redaction (information blacked out/removed) takes place a report detailing what was removed and why will be made and kept. A full copy of the information provided should be retained in order to establish, if a complaint is made, what was redacted and why.
5. Information disclosed should be clear, therefore any abbreviations, codes or technical terms will be clarified and explained in a glossary added to the document. If information contained within the disclosure is difficult to read or illegible, it will be retyped.
6. Information will be provided at the school with the Head of School on hand to help and explain matters if requested. If this is impossible the Head of School will be available to answer any questions that arise.

The views of the applicant should be taken into account when considering the method of delivery. If postal systems have to be used then registered/recorded mail must be used.

Embassy International School will not respond to a third party's request for someone else's personal information without the consent of the person in question (unless it is reasonable in all circumstances and the organisation's duty to uphold the person's confidentiality has been fully considered).

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by the Head of School, or nominated representative.

Dr Lindsay Davidson, Head of School
Embassy International School



Reviewed January 2017
(Next review July 2017)