

## **Data Protection Policy**

### **General statement of St. Columb's School of Music Ltd.'s Duties**

St. Columb's School of Music Ltd. is required to process relevant personal data regarding associates, pupils and their parents and guardians and friends of St. Columb's School of Music Ltd. as part of its operation and shall take all reasonable steps to do so in accordance with this Policy. Processing may include obtaining, recording, holding, disclosing, destroying or otherwise using data. In this Policy any reference to pupils, parents, friends or associates includes current, past or prospective pupils, parents, friends or associates. St. Columb's School of Music Ltd. has a legal responsibility to comply with the Data Protection Act 2018.

### **The Principles**

St. Columb's School of Music Ltd. shall comply with the Data Protection Principles ("the 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

### **Personal Data**

Personal data is data that relates to an individual held in any medium. Personal data covers both facts and opinions about an individual. St. Columb's School of Music Ltd. may process a wide range of personal data of associates, pupils, their parents or guardians as part of its operation. This personal data may include (but is not limited to); names and addresses, bank and other financial details, academic, disciplinary, admissions and attendance records, references, examinations scripts and marks and characteristics such as ethnic group, religion, special needs and all relevant medical information.

### **Processing of Personal Data**

Data must be processed in accordance with the purpose for which it was either given or collected. Where you are moving beyond this it may be possible to process the data where consent is given. It should always be borne in mind that personal data should remain confidential, should only be processed in accordance with the reasons why it has been collected and should not be given to a third party.

### **Sensitive Personal Data**

St. Columb's School of Music Ltd. may, from time to time, be required to process sensitive personal data regarding an associate, a pupil, their parents or guardians. Sensitive personal data includes medical information and data relating to religion, race, ethnic origin or criminal records and proceedings. Where sensitive personal data is processed by St. Columb's School of Music Ltd., the explicit consent of the appropriate individual will generally be required in writing. Personal data may be held in hard or soft copy including but not limited to photos, sound and video recordings.

### **Purposes for which your data may be processed**

Your personal data (including sensitive personal data, where appropriate) is processed by St. Columb's School of Music Ltd. in order to;

- Support teaching and learning
- Monitor and report on progress
- Publish examination results
- Provide pastoral care
- Assess how well St. Columb's School of Music Ltd. is performing
- Communicate with former pupils
- Complete annual statutory census forms
- Promote St. Columb's School of Music Ltd. to prospective parents
- Any other reasonable purpose relating to the operation of St. Columb's School of Music Ltd.

### **Third Parties with whom St. Columb's School of Music Ltd. may need to share your personal data.**

From time to time St. Columb's School of Music Ltd. may pass your personal data to third parties, including local authorities, other public authorities, independent school bodies and St. Columb's School of Music Ltd.'s professional advisers who will process the data;

- To enable the relevant authorities to monitor St. Columb's School of Music Ltd.'s performance
- To compile statistical information (normally used on an anonymous basis)
- To secure funding for St. Columb's School of Music Ltd. and relevant on behalf of individual pupils
- To safeguard pupils' welfare and provide appropriate pastoral (and where relevant medical and dental care) for pupils.
- Where specifically requested by pupils, their parents or guardians.
- Where necessary in conjunction with learning and extra-curricular activities undertaken by pupils
- To enable pupils to take part in national and other assessments and to monitor pupil's progress and educational needs

- To obtain appropriate professional advice and insurance for St. Columb's School of Music Ltd.
- Where a reference or other information is requested by another educational establishment or employer
- Where required by law
- Where reasonably necessary for the operation of St. Columb's School of Music Ltd.

### **Rights of Access**

Individuals have a right of access to information held by St. Columb's School of Music Ltd.. Any individual wishing to access their personal data should put their request in writing to the directors. St. Columb's School of Music Ltd. will endeavour to respond to any such written requests as soon as is reasonably practicable.

You should be aware that certain data is exempt from the right of access under the Data Protection Act. This may include information which identifies other individuals, information which St. Columb's School of Music Ltd. reasonably believes is likely to cause damage or distress, or information which is subject to legal professional privilege. St. Columb's School of Music Ltd. is not required to disclose any details pertaining to entry to St. Columb's School of Music Ltd. at any level. St. Columb's School of Music Ltd. will also treat as confidential any reference given by St. Columb's School of Music Ltd. for the purpose of the education, training or employment or prospective education training or employment of any individual.

### **Whose Rights?**

The rights under the Data Protection Act belong to the individual to whom the data relates. In the case of pupils St. Columb's School of Music Ltd. will however, where necessary, rely on parental consent to process data relating to pupils unless, given the nature of the processing in question, and the pupils age and understanding, it is unreasonable in all the circumstances to rely on the parents' consent. Parents should be aware that in such situations they may not be consulted.

St. Columb's School of Music Ltd. will only grant the pupil direct access to their personal data if in St. Columb's School of Music Ltd's reasonable belief the pupil understands the nature of the request. Pupils agree that St. Columb's School of Music Ltd. may disclose their personal data to their parents or guardian. Where a pupil raises a concern confidentially with an associate and expressly withholds agreement to personal data being disclosed to parents or guardian, St. Columb's School of Music Ltd. will maintain confidentiality unless it has reasonable grounds to believe the pupil does not fully understand the consequences of withholding his consent or where St. Columb's School of Music Ltd. believes that disclosure will be interests of the pupil or other pupils.

Where every attempt will be made to maintain confidentiality, it should be borne in mind that obligations go beyond the individual requesting confidentiality, and could include other pupils, parents or guardians.

### **Disclosure of Information**

St. Columb's School of Music Ltd. may receive requests from third parties to disclose personal data it holds about associates, pupils, their parents or guardians. St. Columb's School of Music Ltd. confirms that it will not generally disclose information unless the individual has given consent or one of the specific exemptions under the Data Protection Act applies. However, St. Columb's School of Music Ltd. 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 and to give a confidential reference for a member of associates at the request of a future employer;
- To give information relating to outstanding fees or payment history 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 St. Columb's School of Music Ltd.;
- To disclose details of a pupils medical condition where it is in the pupils interests to do so, for example for medical advice, insurance purposes or to organisers of school trips.

Where St. Columb's School of Music Ltd. 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 St. Columb's School of Music Ltd.**

St. Columb's School of Music Ltd. will, from time to time, make use of personal data relating to associates, pupils, their parents or guardians in order to promote St. Columb's School of Music Ltd.'s wider interests. Examples may include:

- To make use of photographic images of associates and pupils in School publications and on St. Columb's School of Music Ltd. website.
- To give information relating to the fundraising, marketing and promotions activities of St. Columb's School of Music Ltd. and initiatives considered beneficial to members of the wider School community. To maintain relationships with former members of St. Columb's School of Music Ltd. and to inform them of events and activities.

**Accuracy**

St. Columb's School of Music Ltd. will endeavour to ensure that all personal data held in relation to an individual is accurate. Individuals must notify St. Columb's School of Music Ltd. of any changes to information held about them. An individual has the right to request that inaccurate information about them is erased or corrected.

**Security**

St. Columb's School of Music Ltd. will take reasonable steps to ensure that associates will only have access to personal data relating to associates, pupils, their parents or guardians on a strictly "need to know" basis. All associates will be made aware of this Policy and of their duties under the Data Protection Act. St. Columb's School of Music Ltd. will ensure that all personal information is held securely and is not accessible to unauthorised persons. Security measures include effective IT security, use of strong passwords, and hard copies made only when essential and these to be kept in secure filing cabinets.

**Compliance**

If an individual believes that St. Columb's School of Music Ltd. has acted otherwise than in accordance with the data protection Act, then that individual should inform St. Columb's School of Music Ltd. directors.

**Confidentiality**

Any School information/records including details of pupils, parents and employees whether actual, potential or past, other than those contained in authorised and publicly available documents, must be kept confidential unless St. Columb's School of Music Ltd.'s prior written consent has been obtained.