



Leonardo
Gifted School

www.leonardoschool.ro

A unique International British School exclusively dedicated to highly gifted children

contact@leonardoschool.ro

+40729 029 484

Leonardo Gifted School

Data Protection Policy

Author: Gabriela Cosma

Superiors name: Monica Gheorghiu

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Policy is: PUBLIC

Data Protection Policy

Aims

The School collects a large amount of personal data every year including: staff records, names and addresses of those requesting prospectuses, examination marks, references, fee collection as well as the many different types of data used by the School.

The purpose of this policy is to guarantee and protect the rights and privacy of individuals in accordance with Data protection UK and Romania Legislation.

The Data Protection Policy applies to electronic and paper records held in structured filing systems containing personal data. It also applies to personal data held visually in photographs or video clips or as sound recordings.

Legislative Framework

- The U.K. Data Protection Acts 1988 and 2003 (the “Data Protection Acts”) lay down strict rules about the way in which personal data and sensitive personal data are collected, accessed, used and disclosed. The Data Protection Acts also permit individuals to access their personal data on request, and confer on individuals the right to have their personal data amended if found to be incorrect.
- The Romanian legal basis is the Law No. 677/2001 on the Protection of Individuals with Regard to the Processing of Personal Data and the Free Movement of Such Data, amended and completed and Law 506/2004 concerning the processing of personal data and privacy in the electronic communications sector.

Definitions

Personal data are data which can identify living individuals. As well as images, names and contact details it can also include numerical, statistical, physical, physiological, psychological, economic, cultural or social information from which an individual’s identity can be derived.

In the context of this document and the School’s requirement to process ‘personal data’ as part of its duty of care and to educate its students, *personal data* may include:

- school admission and attendance registers;
- student's curricular records;
- reports to parents on the achievements of their children;
- records in connection with students entered for prescribed public examinations;
- staff records, including payroll records;
- student psychological data records;
- personal information for teaching purposes;
- records of contractors and suppliers.

Sensitive personal data are personal data relating to the racial or ethnic origin, health, psychological tests results, sexual life, trade union membership or religious belief. This data requires a greater level of consideration when being collected, processed or transferred.

Data Protection Principles

- Personal data shall be processed fairly and lawfully;
- Personal data shall be obtained only for one or more specified and lawful purposes;
- Personal data shall be adequate, relevant and not excessive;
- Personal data shall be accurate and where necessary, kept up to date;
- Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes;
- Personal data shall be processed in accordance with the rights of data subjects under the UK and Romanian legislation
- Personal data shall be kept secure i.e. protected by an appropriate degree of security;
- Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

General Statement

The school is committed to maintaining the above principles at all times. Therefore the school will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information
- Ensure our staff are aware of and understand our policies and procedures

Responsibilities of Staff

All staff are responsible for:

- Checking that any information that they provide to the School in connection with their employment is accurate and up to date.
- Informing the School of any changes to information that they have provided, e.g. change of address, either at the time of appointment or subsequently. The School cannot be held responsible for any errors unless the staff member has informed the School of such changes.
- Handling all personal data (eg – pupil attainment data) with reference to this policy.

Data Security

All staff are responsible for ensuring that:

- Any personal data that they hold is kept securely.
- Personal information is not disclosed either orally or in writing or via Web pages or by any other means, accidentally or otherwise, to any unauthorised third party.

Staff should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases.

Personal information should:

- Be kept in a filing cabinet, drawer, or safe in a secure office, or;
- If it is computerised, be password protected both on a local hard drive and on a network drive that is regularly backed up; and

- If a copy is kept on a USB memory key or other removable storage media, that media must itself be password protected and/or kept in a filing cabinet, drawer, or safe.

Rights of Access

Individuals have a right of access to information held by the School. Any individual wishing to access their personal data should put their written request to the Head of School. The School will try to respond to any such written requests as soon as is reasonably practicable and in any event, within 40 days for access to records.

It is important to note that certain data is exempt from the right of access under the Data Protection Act. This can include:

- information which identifies other individuals;
- information which the School reasonably believes is likely to cause damage or distress;
- information which is subject to legal professional privilege;
- student examination scripts.

Use of Personal Information by the School

As part of the entry procedure into the School at any age, all students are asked to sign an agreement giving the School their consent to use their personal data for:

- Use of photographic images in School publications or on the school website.
- Fundraising, marketing or promotional purposes and to maintain relationships with students of the School

The Data Controller and the Designated Data Controllers

The School has identified its Designated Data Controllers as: The Head of School, the Business Manager and the Business Support Staff.

The Designated Data Controllers will deal with day to day data protection matters.

Any member of staff, parent or other individual who considers that the Policy has not been followed in respect of personal data about himself or herself or their child should raise the matter with the Head of School, in the First instance.

Gabriela Cosma, March 2015

Data Protection Policy

Standardized Acknowledgment list of Internal Policy by the Board

The member of the Board of Directors accepts and by signature acknowledges enactment of Internal Policy name: **Emergency School Closure Policy**

Number:

I, a member of the Board of Directors declare that I am familiar with the Internal Policy, and I will inform managers, employees and volunteer in my line of management about its existence and /or update.

Department	Name and Surname	Signature	Date