



MILTON ABBEY

DATA PROTECTION POLICY (FOR WEBSITE)

DECEMBER 2016

This policy (together with any other documents referred to in it) sets out the basis on which we process personal data that has been provided to or collected by The Council of Milton Abbey School Limited ("the School"). Please read the following carefully to understand the School's views and practices regarding personal data and its treatment. By visiting www.miltonabbey.co.uk the user accepts and consents to the practices described in this policy.

1. THE SCHOOL'S DUTIES

- 1.1. The School may need to process personal data about its current, prospective and former pupils and their parents, its current, prospective and former staff, its suppliers/contractors, its current and prospective supporters and other individuals connected to the School, as part of its everyday operations and is legally obliged to process such personal data in accordance with the Data Protection Act 1998 ("the DPA").
- 1.2. The School is the data controller of this personal data under the DPA. The School is committed to compliance with the DPA and takes seriously the responsibility of handling personal information.
- 1.3. This policy has been developed to ensure that the School meets its obligations under the DPA.

2. THE DATA PROTECTION PRINCIPLES

- 2.1. The data protection principles contained in the DPA ("the Data Protection Principles") require the School to ensure all personal 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;
 - protected by appropriate security; and
 - not transferred to other countries without adequate protection.

3. DATA PROTECTION OFFICER

- 3.1. The School has appointed Julian Litchfield as its Data Protection Officer.
- 3.2. The Data Protection Officer is responsible for:
 - 3.2.1. endeavouring to ensure that personal data is processed by the School in compliance with this policy and the Data Protection Principles;
 - 3.2.2. arranging appropriate training for members of the School's staff who are responsible for processing personal data; and
 - 3.2.3. the enforcement, monitoring and review of this policy.
- 3.3. The School's staff is required to collect and handle personal data in compliance with this policy.

4. PERSONAL DATA PROCESSED BY THE SCHOOL

4.1. Personal data processed by the School may be information stored electronically or in paper-based filing systems and can take different forms including factual information, expressions of opinion, images or other recorded information relating to a living individual who can be identified.

4.2. Personal data processed by the School may include:

- names, addresses, email address and other contact details;
- any education related records or information including academic, disciplinary, admissions and attendance records (including information about any special needs); examination scripts and marks of pupils;
- references given or received by the School about pupils;
- images of pupils, including photographs of pupils engaging in School activities;
- employment details and financial information relating to parents and guardians; and
- additional information required for the employment or appointment of staff and contractors including images and biometric data.

4.3. Sensitive personal data processed by the School about an individual may include data concerning their ethnic group, religious beliefs, criminal records and proceedings, trade union membership and relevant medical information.

4.4. The School may collect personal data directly from the data subject (or in the case of a pupil, from his/her parents or guardians) and from third parties (for example, other schools, authorities).

4.5. You may also give us information about you by filling in forms on our website www.miltonabbey.co.uk or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our website, subscribe to our service, participate in discussion boards or other social media functions on our site, enter a competition or survey and when you report a problem with our site. The information you give us may include your name, address, email address and phone number, financial and credit card information, personal description and photograph.

5. WHY DO WE PROCESS PERSONAL DATA?

5.1. Personal data (including sensitive personal data, where appropriate) is, and will be, processed by the School in accordance with the Data Protection Act for the following purposes:

- The provision of education and support to the pupils, including: activities in connection with the admissions process; participation of pupils in internal and public examinations and the publication of results and the pupils' individual achievements; the monitoring of and reporting on pupils' educational development including the preparation of individual performance reports and letters to parents; facilitating participation in and the provision of extra-curricular activities, such as the Combined Cadet Force and Department of Education schemes; the provision of bursaries to pupils; careers services including the provision of references to current and former pupils; and the provision of alumni events and services by the Milton Abbey Association;
- The general administration of the School including: the provision of information to relevant school authorities for the purpose of monitoring the School's performance; the preparation

of annual returns and reports to be submitted to educational monitoring organisations and inspectorates;

- The promotion of the School and its objectives, including: the use of photographic images of pupils on the School's website as well as in hard copy promotional or marketing material published by the School including but not limited to monthly e-newsletters, termly newsletters circulated to current, former and prospective parents, members of the Milton Abbey Association, business contacts, associates and other contacts or prospective associates of the School and the general public;
- The administration of the School's staff, agents and suppliers including: DBS checks; the provision of references for current and former staff; disciplinary and grievance procedures and general appraisal purposes; and
- The fulfilment of the School's contractual and legal obligations.

6. PROCESSING OF PERSONAL DATA

- 6.1. The School will only process personal data for the purpose(s) for which it was originally acquired and will not process it for any other purpose without the data subject's permission, unless required or otherwise permitted by law.
- 6.2. The School will not transfer personal data outside of the EEA unless it is satisfied that the data subject's rights under the DPA will be adequately protected.
- 6.3. The School will seek permission from an individual and, in the case of a pupil, their parents or guardians before allowing that person to feature particularly prominently in films, articles or other materials produced by, or otherwise prepared in assistance with, the School and published for documentary, marketing or promotional purposes.
- 6.4. When processing personal data for the purposes set out above the School may communicate by post, email and SMS.

7. THIRD PARTIES WITH WHOM THE SCHOOL MAY NEED TO SHARE PERSONAL DATA

- 7.1. Personal data shall only be disclosed to those members of the School's staff, agents and suppliers who need to access the personal data to carry out the purpose(s) for which it was acquired. The School adopts appropriate security measures to ensure that personal data is kept secure and not processed without proper authority. The School observes legislative requirements and current best practice to ensure personal data is kept for no longer than necessary.
- 7.2. From time to time the School may pass personal data (including sensitive personal data where appropriate) to third parties, including local authorities, other public bodies (eg the DBS, Department for Education and Department for Work and Pensions), independent school bodies such as the Independent Schools Inspectorate and the Independent Schools Council, health professionals, the School's professional advisers and its subsidiaries, who will process the data for the purposes set out in section 5 of this policy or where otherwise required by law.
- 7.3. The School may also, unless the data subject requests otherwise, share personal data about former pupils with the Milton Abbey Association who may contact alumni from time to time

about the School and its activities and for promotional and marketing purposes.

8. USE OF THE SCHOOL'S WEBSITE

8.1. By visiting www.miltonabbey.co.uk you are accepting and consenting to the practices described in this policy.

8.2. With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

8.3. Information we collect about you when you use our website. We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to allow our site to deliver customised content and advertising to users whose activity indicates that they are interested in a particular subject; and
- as part of our efforts to keep our site safe and secure.

8.4. Whilst using our website, we may also collect certain personally identifiable information, including email address, name, home or work address or telephone number. Any such data will be processed in accordance with this policy. Please note that any personal or sensitive personal data that you disclose through public message boards can be accessed and collect by third parties.

8.5. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9. RIGHTS OF ACCESS TO PERSONAL DATA

9.1. Data subjects have the right to be given access to personal data held about them by any data controller. The Information Commissioner's Office's guidance is that, in the majority of cases, by the age of 12 an individual has sufficient maturity to understand his rights and to make an

access request themselves if they wish. A parent or guardian would normally be expected to make a request on a child's behalf if the child is less than 12 years old.

9.2. If individuals wish to access their personal data held by the School or, in the case of parents or guardians, if they wish to access personal data held about their child or a pupil for whom they have parental responsibility, then a request should be submitted to the Data Protection Officer in writing. The School may charge an administration fee of £10 for providing this information.

9.3. The School aims to respond to such subject access requests as quickly as possible and will ensure that any information is provided within 40 days of receipt of the request unless an exemption from the right of access under the DPA applies.

10. ACCURACY

The School will endeavour to ensure that all personal data held in relation to individuals is accurate and up to date. Individuals must notify the School of any changes to information held about them and can request that inaccurate information about them is corrected.

11. SECURITY

The School will take reasonable steps to ensure that personal data is kept secure and is only accessed by authorised members of its staff for the purposes for which it is held. All staff will be made aware of this data protection policy and their duties under the DPA.

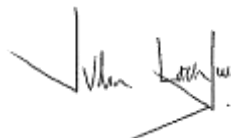
12. ENFORCEMENT

11.1 If an individual believes that the School has not complied with this policy or has acted otherwise than in accordance with the DPA, the individual should notify the Data Protection Officer who shall, where appropriate, refer the matter for resolution in accordance with the School's grievance/disciplinary procedure (for staff) or complaints procedure (for parents/pupils).

11.2 This policy applies to all officers of the School and breach of the policy may result in appropriate disciplinary action being taken.

13. GUIDANCE

Any queries about this policy or how personal data is processed by the School should be referred to the Data Protection Officer for further guidance.



Julian Litchfield FCIPD
Bursar
& Data Protection Officer