



# General Data Protection Regulation Policy for Campbell Harris College

**Reviewed:** May 2018

## **Statement of Intent:**

Campbell Harris College strives to comply with the 2018 GDPR legal requirements.

To facilitate this Campbell Harris College has nominated a Data Controller, Mark Harris and a Data Officer, Eilidh Stephenson.

This College collects and uses personal information about staff, students and other individuals who come into contact with the school.

This information is collected for the sole purpose of ensuring that the College can fulfil its function in educating the students who enrol on its courses, or facilitating exams for those who choose to use the College as their chosen Examination Centre.

In the context of this, there will be a legal requirement to collect and use the information in a way that ensures that the College complies with its statutory obligations.

As a College we have a duty to be registered, as Data Controllers, with the ICO detailing the information held and its use.

Additionally the College issues a Fair Processing Notice to all students/staff explaining why and what information is collected, and informing them to whom the information may be passed.

All members of Campbell Harris Staff will be informed of their responsibilities and duties with regard to data collection and handling.

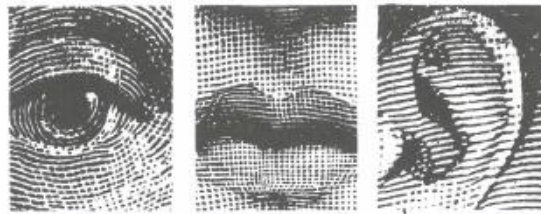
## **Key Principles:**

The purpose of the GDPR is to return control to individuals of their personal data, and to ensure secure storage of all personal data collected.

Personal information or data is defined as data which relates to living individuals who can be identified from that data.

All personal data collected by Campbell Harris will be processed fairly and lawfully.

- Data collected by the College will be for specified, explicit and legitimate purposes
- Any collected data will be securely stored and will not be retained beyond the time it is needed to support individual students or staff members
- Only data that is actually relevant will be collected.



C A M P B E L L H A R R I S

- Individuals will be allowed to access their data as outlined in the GDPR, and can request for data to be deleted or updated.
- Any complaints will be investigated by the Data Controller.

Whenever data is collected, the process will be both fair and transparent: the Data Controller will review that this is the case on an annual basis.

Whenever sharing details of data protection with individuals, the language used will be accessible and easily understood.

### **Guidelines for Staff working at CH:**

All staff will be informed of the Data Protection regulation, and will receive a copy of the ***Guidelines for Staff***.

It will be part of their contractual duty to maintain student's data confidential and secure.

The Data Controller will facilitate on-going training and advice for members of staff as needed.

### **Security of Information/Data collected:**

Data records such as registration forms will be kept in a locked cupboard and access to these cupboards will be limited to the Data Controller, the Data Officer and the Exams Officer.

Computer screens in the office will be blanked whenever the Administrative staff are not at their desks. The computer screens will be placed so that they are inaccessible to people attending Reception.

No data will be given out over the telephone, or in e-mails, without security checks and/or permission by the Data Officer.

A *Data Protection Privacy Statement* (Fair Processing Notice) will be completed by each student and staff member when they enrol or are appointed to the college.

### **Access to Data Procedures:**

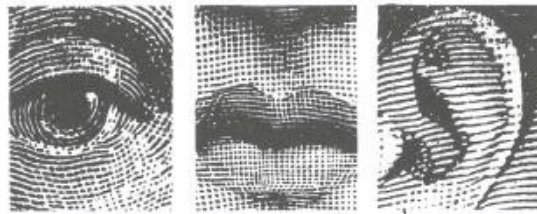
Students and staff have the legal right to request sight of all data specific to themselves. (DPA 1998)

The College Data officer, having verified the individual's identity, will supply this information within 40 days, and the College may be entitled to charge up to £10 for this service .

In addition, the students may request that data is updated or deleted, but there is no charge for this.

Where students are minors, their parents/guardians have the right to access their child's data.

Withholding of data is permitted to prevent a crime, or because of military or national security, or to prevent tax evasion.



C A M P B E L L H A R R I S

If there are concerns over the disclosure of information, additional advice should be sought from Senior Management or the ICO.

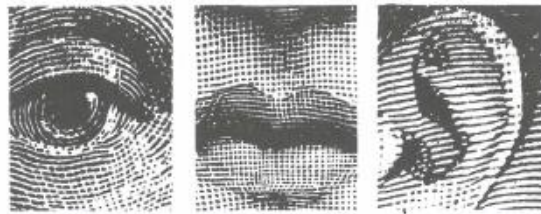
**Complaints Procedure:**

All complaints about the type of data held, the security or the method of processing should be referred in writing to the Data Officer in the first instance.

The individual’s right to complain will be included in the *Data Protection Privacy Statement.(FPN)*

**Table of Data collected at CH**

<b>Data requested</b>	<b>How collected</b>	<b>Reason for collecting</b>
Name	Application Form	Identification
Date of Birth	Application Form	Identification
Address Mail and email	Application Form	To correspond and send exam outcomes
Access needs	Application Form Form 8, Reports from other professionals EHCP , Ofsted Approval	To enable students to fully access their learning when they have a disability
Medical needs	Application Form Form 8, Reports from other professionals EHCP , Ofsted Approval	To enable CH to meet the needs of the students with medical needs
Courses chosen	Application Form	To ensure that they attend appropriate lessons.



C A M P B E L L H A R R I S

<b>Data requested</b>	<b>How collected</b>	<b>Reason for collecting</b>
Exams chosen	Application Form	To enable Examination Officer to apply for correct exams
Details of payment	Application Form	To enable the Financial Officer to monitor income
Payroll information	Tutor Application Form	To enable payment of Tutors
Previous exam results	Application Form	To enable CH to meet the current educational needs of students
Emergency contact	Application Form	To use in case of emergencies
Telephone Number	Application Form	To keep student informed

### **Transfer of Data:**

Sometimes data needs to be shared with other agencies, e.g. the examination boards, in order to facilitate the needs of the students.

This sharing of data is only permitted with permission from the student or, in the case of minors, their parents.

Personal data may also be shared in the event of a medical, or other, emergency, but will be on a need to know basis only.

Data must not be shared outside the EEA without adequate protection being put in place.



### **Data Breaches:**

Any data breach MUST be reported, however small, and all staff should be aware of this. The report must be filed within 72 hours to the Data Officer: evidence must be collected to show that despite the breach, no data was compromised, and therefore no fines need to be imposed.

### **Data deemed relevant to collect at CH:**

1. Internal/External Registration form: name, dob, address, telephone, email address, next of kin/person responsible for fees, additional needs, courses/exams to be taken, medical needs.
2. Data protection privacy statement: signature, name and dob.
3. Self-addressed envelopes for exam results: name and address.
4. Job Application form: name, dob, contact details, employment history, NI, education history
5. Post-Results Services form: signature, name.
6. Enquiry form: name, guardian name, contact details, education history, notes relevant to future education.

### **Retention of Data at CH:**

Personal data will be kept for 3 years (external candidates) or 10 years (internal students and staff) to respond to queries and provide references and educational information when requested by that person.

All data collected at CH will be reviewed annually and will be shredded if no longer required according to the Privacy Notice (FPN).

Whenever the data is updated, the old copy will be shredded.