



English International School
Moscow
an Orbital Education School

EIS

Data Protection

policy

The purpose of the policy is to protect the rights and privacy of individuals, and to ensure that data about them are not processed without their knowledge and are processed with their consent wherever possible. The School is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal data. The policy covers:

1. Scope of the policy

1.1 The policy applies to electronic and paper records held in structured filing systems containing personal data, meaning data which relates to living individuals who can be identified from the data. This includes any expression of opinion about an individual and intentions towards an individual. It also applies to personal data held visually in photographs or video clips or as sound recordings. 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 research data used by the School.

2. Responsibilities

2.1 Data Protection means that the School must:

- Manage and process personal data properly
- Protect the individual's rights to privacy
- Provide an individual with access to all personal information held on them

2.2 The School has a legal responsibility to protect the data it holds securely.

2.3 The Head of School is responsible for drawing up guidance on good data protection practice and promoting compliance with this guidance through advising staff on the creation, maintenance, storage and retention of their records which contain personal information.

2.4 Every member of staff that holds information about identifiable living individuals has to

comply with data protection in managing that information. Individuals can be liable for breaches of the Act.

3. Guidance

Guidance on the procedures necessary to comply with this policy is available below. This guidance covers:

- Introduction to Data Protection including Data Protection principles, types of data involved and key concepts.
- Best practice guidelines including:
 - Use of personal data by employees and students
 - Transfer of personal data to third parties
 - Security of personal data
 - Examinations
 - Use of personal data in research
 - Confidential references
 - Transfer of personal data
- Procedures for dealing with subject access requests

Guidance for the public on Data Protection and how to make a request is available on the Data Protection pages in the Annex 1 of this Policy.

4. Status

This policy was approved by Ms. Mel Hitchcocks, Head of School of English International School Moscow SW and also applies to English International School Moscow West, in June 2021. It will be reviewed every two years.

Annex 1

Guide to Data Protection

This guide gives an introduction to Data Protection and information on how to make a request for personal information relating to yourself or for someone that you are acting on behalf of (for example a student).

What is Data Protection?

Data Protection aims to protect individual's fundamental rights and freedoms, notably privacy rights, in respect of personal data processing.

The policy applies to paper and electronic records held in structured filing systems containing personal data, meaning data which relates to living individuals who can be identified from the data. This includes any expression of opinion about an individual and intentions towards an individual. It also applies to personal data held visually in photographs or video clips or as sound recordings. 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 research data used by the School.

Data protection operates by giving individuals the right to gain access to their personal data. This is done by making a subject access request in which they are entitled to:

- a description of their personal data
- the purposes for which they are being processed
- details of whom they are or may be disclosed to

Individuals can also prevent processing of their data in certain circumstances, opt-out of having their data used for direct marketing and in automated decision making processes, apply to the courts for inaccurate data to be corrected and claim compensation for damage and distress caused as a result of any data protection breach.

What data is involved?

Personal data means information which relates to a living individual who can be identified from that data or from data and other information which is in the possession of the data controller. It includes opinions about individuals.

Personal data is information on:

- Name
- Address
- Telephone number

Sensitive personal data is information on:

- Racial or ethnic origin
- Political opinions
- Religious beliefs
- Trade Union membership
- Physical or mental health
- Sexual life
- Criminal convictions

The processing requirements for sensitive personal data are more stringent than for personal data.

Definitions

- **Personal data** are data relating to a living individual who can be identified from that information or from that data and other information in the possession of the data controller or which are likely to come into his or her possession.
- **Data subject** is a living individual who is subject of personal data.
- **Data subject access** is the right of an individual to access personal data relating to him or her which is held by a data controller.

- **Data controller** is a person who makes decisions with regard to particular personal data, including decisions about the purposes for which the personal data are processed and the way in which the personal data are processed.
- **Data processor** is a person who processes the data on behalf of the data controller.
- **Processing of personal data** means anything at all done to the data including collection, holding, organizing, consulting, disclosure, and destruction.

Data Protection Principles

Data Protection principles state that personal data shall be:

1. Obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met.
2. Obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with those purposes.
3. Adequate, relevant and not excessive in relation to the purposes for which they are held.
4. Accurate and where necessary, kept up to date.
5. Held no longer than is necessary for the purposes for which they were obtained.
6. Processed in accordance with the rights of the data subjects, including the general rights to access information held about them and, where appropriate, to correct and erase it.
7. Kept securely and safely with appropriate measures to prevent unauthorized or unlawful processing of the data and against accidental loss, destruction or damage.
8. Only transferred to a country outside of either Russia (EIS) or the UK (Orbital Education) if that country has an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

How do I access my personal data held by the School?

To make a subject access request you will need to complete a subject access request form. **This form is available in Annex 2 of this Policy.**

Annex 2

ENGLISH INTERNATIONAL SCHOOL OF MOSCOW SUBJECT ACCESS REQUEST FORM

1. Details of the person requesting the information

Full
name.....
.....

Address.....
.....
.....
.....

Telephone
number.....
.....

Email.....
.....

2. Are you the Data Subject?

YES if you are the Data Subject please supply evidence of your identity i.e. ID card, driving licence, birth certificate (or photocopy) and if necessary, a stamped addressed envelope for returning the document (please go to question 5).

NO are you acting on behalf of the Data Subject with their written authority? If so, that authority must be enclosed (please complete questions 3 and 4)

3. Details of the Data Subject (if different to 1.)

Full
name.....
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Address.....
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.....
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Telephone number.....
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Email.....
.....

4. Please describe your relationship with the Data Subject that leads you to make this request for information on their behalf.

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5. If you wish to see only certain specific document(s), for example a particular examination report, a specific departmental file etc., please describe these below:

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6. If you would a more general search, please note that the University will normally automatically search the following sections for personal data:

Registry, Personnel, any academic unit that you have studied with as part of your degree or worked in. Please inform us of any other departments or units that you have been in contact with which you would like to be searched for relevant data.

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7. Declaration

I,certify that the information given on this application form is true. I understand that it is necessary for the School to confirm my/Data Subject's identity and it may be necessary to obtain more detailed information in order to locate the correct information.

Signed.....Date.....

Please return the completed form to the ENGLISH INTERNATIONAL SCHOOL MOSCOW. Documents which must accompany this application are:

- a) Evidence of your identity
- b) Evidence of the Data Subject's identity (if different from above)
- c) Evidence of the Data Subject's consent to disclose to a third party (if required as indicated above)
- d) Stamped, addressed envelope for return of proof of identity/authority documents, where appropriate

Office use only

Date request received.....

Notes.....

Date completed.....

PREPARED BY: Mel Hitchcocks, Head of School EIS SW 29/6/2021

APPROVED BY:

This document is to be reviewed **annually** and updated as and when changes occur.