



TLC PRIVATE SCHOOL AND INSTITUTE

KINDERGARTEN • PRIMARY • SECONDARY

Where every child matters

Privacy Policy

Introduction

TLC Private School offers comprehensive, co-educational teaching from Kindergarten to Secondary. The School follows the 2014 National Curriculum for England (<https://www.gov.uk/government/collections/national-curriculum>), and as such, lessons are taught in English, and grades and marks for assessment purposes reflect standard UK practice.

This Privacy Policy is compliant with the General Data Protection Regulation (GDPR) 2016/679, which allows us to collect and use pupil information with consent of the data subject, where we are complying with a legal requirement, where processing is necessary to protect the vital interests of a data subject or another person and where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This Privacy Policy provides detailed information about how we collect, store, process and share personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact the schools Data Protection Officer by email: enquiries@tlccyprus.com

Why do we collect and process personal information?

We collect and process personal data

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services and how well our school is doing
- statistical forecasting and planning
- to comply with the law regarding data sharing

What data do we collect and process?

We collect the following information:

- information about prospective, current and former students and their parents
- staff
- suppliers and contractors
- friends and supporters
- other individuals connected to or visiting the TLC Private School including students enrolled in our summer school.

TLC Policies and Procedures

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Categories of personal information we collect, hold, process and share include:

- Personal information (such as names, addresses, telephone numbers, e-mail addresses and other contact details)
- Characteristics (such as language, nationality, and religion)
- Admissions, academic and other education related records
- Relevant medical, special educational needs and behavioural information
- Assessment information
- Education and employment data
- Images, audio and video recordings
- Financial information
- Courses, meetings or events attended.

As a school, we need to process special category personal data e.g. concerning health or ethnicity. We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

How do we collect and handle personal data?

We collect most of the personal data we process directly from the individual concerned (or in the case of students, from their parents). In some cases, we collect data from third parties (for example, referees, previous schools or professionals or authorities working with the individual) or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. We do not transfer personal data outside of the European Union unless we are satisfied that the personal data will be afforded an equivalent level of protection.

Who do we share personal information with?

In the course of school business, we routinely share personal data with:

- Examination boards,
- the school's professional advisors
- relevant authorities (e.g. Ministry of Education, Welfare Office, Department of Statistics, Immigration Office, Tax Department, Social Insurance Services).

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How do we store your data?

Some of our systems are provided by third parties, e.g. hosted databases, school website, school calendar, and SIMS Parent App or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not share or sell personal data to other organisations for their own purposes.

How will we use your data?

TLC processes personal data to support the school's operation as a private school registered by the Cyprus Ministry of Education and for:

- The selection and admission of students.
- The provision of education to students including:
 - The administration of the school curriculum and timetable.
 - monitoring student progress and educational needs, reporting on the same internally and to parents.
 - administration of students' entries to internal and external examinations, reporting upon and publishing the results.
 - providing references for students (including after a student has left).
- The provision of educational support and related services to students (and parents) including:
 - the maintenance of discipline.
 - provision of careers and library services.
 - administration of sports fixtures and teams, school trips.
 - provision of the school's IT and communications system and online learning environment (and monitoring the same) all in accordance with our IT Policy.
- The provision of educational courses during school holidays to students enrolled on such courses.
- The safeguarding of students' welfare and provision of pastoral care, welfare, health care services by school staff.
- Compliance with legislation and regulation including the preparation of information for inspections, submission of information to the Ministry of Education and other government departments.

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- Operational management including:
 - the compilation of student records.
 - the administration of invoices, fees and accounts.
 - the management of the School's property.
 - the management of security and safety arrangements (including the use of CCTV in accordance with our CCTV Policy and monitoring of the school's IT and communications systems in accordance with our IT Policy).
 - management planning and forecasting.
 - research and statistical analysis.
 - the administration and implementation of the School's rules and policies for students and staff.
 - the maintenance of archives and other operational purposes.
- Staff administration including:
 - the recruitment of staff and/or engagement of sub-contractors.
 - administration of payroll, pensions and sick leave.
 - review and appraisal of staff performance.
 - conduct of any grievance, capability or disciplinary procedures.
 - the maintenance of appropriate human resources records for current and former staff.
 - providing references.
 - The promotion of the School through its own website, the prospectus and other publications and communications (including through our social media channels).
 - Maintaining relationships with the wider school community through school led events.

The processing set out above is carried out to fulfil our legal obligations (including those under our parent contract and staff employment contracts). We also expect these purposes to form our legitimate interests.

How long do we keep personal data for?

We retain personal data for / in accordance with our retention schedule.

What are your data protection rights?

The right to access

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Data Protection Officer via: enquiries@tlccyprus.com

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The right to rectification

You have the right to access and request that TLC correct/amend any information you believe is inaccurate. You also have the right to request TLC to complete information you believe is incomplete.

The right to data portability

You have the right to request that TLC transfer that data that we have collected to another person or organisation, or directly to you, under certain conditions.

The right to restrict processing

You have the right to request that TLC restrict the processing of your personal data, under certain conditions.

The right to object to processing

You have the right to object to TLC processing your personal data, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us by email to: enquiries@tlccyprus.com. You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any student examination scripts (though examiners' comments may be disclosed), nor any confidential reference given by the school for the purposes of the education, training or employment of any individual.

Student data

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to students (if consent is required) unless, given the nature of the processing in question, and the student's age and understanding, it is more appropriate to rely on the student's consent.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, we will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

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However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the student or other students, or is required by law.

Students can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. A person with parental responsibility will generally be entitled to make a subject access request on behalf of students, but the information in question is always considered to be the child's at law. A student of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.

This Policy

Our Privacy Policy should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Parent Contract, Safeguarding Policy, Health & Safety Policy, Acceptable Use Policy.

We will update this Privacy Policy from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

As a data subject you may address any concern of yours on a matter relating to your data protection rights to the School's Data Protection officer by sending an email to enquiries@tlccyprus.com

Any complaints you may have with regards to any violation of your rights under the GDPR may be lodged with the relevant supervisory authority whose details are as follows:

Office of the Commissioner on Personal Data Protection

Office Address

Iasonos 1, 1082 Nicosia, Cyprus

Postal Address

P.O.Box 23378, 1682 Nicosia, Cyprus

Tel: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

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