

St. Christopher's International School Privacy Notice



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1. Introduction

In the normal provision for you and your child, St. Christopher's International School (SCIS) will process personal data relating to you and your child. SCIS is therefore a data controller and seeks to comply with Kenyan and UK data protection laws.

Under UK and Kenyan data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data relating to you and your child.

We, St. Christopher's International School, are the 'data controller' for the purposes of UK & Kenyan data protection law.

Our data protection officer is Ms. Joan Okoth (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you and your child includes, but is not restricted to:

- Contact details and contact preferences (such as your name, address, email address and telephone numbers)
- Details of your family circumstances
- Details of any safeguarding information including court orders or professional involvement
- Records of your correspondence & details of any complaints you have made
- Results of internal/external examinations & pupil attainment
- Exclusion information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs and videos

We may also collect, use, store and share (when appropriate) information about you and your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Characteristics, such as ethnic background or special educational needs of pupils

We may also hold data about your child that we have received from other organisations, including other schools and social services.

3. Why we use this data

We use the data listed above to:

- a) Support pupil learning
- b) Monitor and report to you on your child's attainment and progress
- c) Keep you informed about the running of the school (such as emergency closures) and events
- d) Provide appropriate pastoral care and emotional support
- e) Protect pupil welfare

- f) Assess the quality of our services & provide a quality learning environment
- g) Administer admissions waiting lists
- h) To respond to requests from staff and former pupils regarding historic information about their time at SCIS
- i) Comply with the law regarding data sharing

3.1 Use of your child's personal data for marketing purposes

Where you have given us consent to do so, we may send your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them. This is done using the 'Use of Images Consent Form' on admission.

4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- In accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation
- In accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- In accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason, such as providing a safe learning environment
- In accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
- In accordance with the 'consent; basis – we obtain consent from you to use your personal data

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK and Kenyan data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK and Kenyan data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent

- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Previous Schools they have attended
- Government departments or agencies
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about you and your child for as long as is necessary and with regard for the purposes described in Section 3 or any other reason that has been communicated to you.

In general, your personal data is stored on the secure servers of our data service providers, ISAMS located in the UK. It is also necessary for some performance data to be stored on our Google Drive, which is password protected and secured in the Google data centres and is encrypted in-transit and at-rest.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

7. Who we share data with

We do not share information about you or your child with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with UK and Kenyan data protection law), we may share personal information about you and your child with:

- Schools that pupils attend after leaving St. Christopher's
- School that pupils are attending for purposes of trips, fixtures and activities
- Government departments or agencies
- Our regulator, Council of International Schools (CIS)
- Suppliers and service providers; Catering
- Health authorities
- Providers of IT hosting and maintenance services
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants

- Charities and voluntary organisations
- Police forces, courts, tribunals (where we are required to by law)

8. Cookies

When you view this website, some information may be stored on your computer. This information will be in the form of a "cookie" or similar file and will allow the website to tailor the experience to your interests and preferences. With most Internet browsers, cookies can be blocked or erased after visiting a website. Some aspects of this website may not function properly if your browser is set to block cookies.

9. Your rights

9.1 How to access personal information that we hold about you & your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about you and your child.

If you make a subject access request, and if we do hold information about you or your child, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make a subject access request on their behalf.

9.2 Your right to access your child's educational record

Parents, or those with parental responsibility, also have the right to access their child's educational record (which includes most information about a pupil). This right applies as long as the pupil is aged under 18.

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced.

To make a request, please contact Ms. Joan Okoth.

9.3 Your other rights regarding your data

Under UK and Kenyan data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing

- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.

10. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

11. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Our data protection officer is, Ms. Joan Okoth info@scsinternational.sc.ke