



The
British School
of Monaco

POLICY SECTION: Section 3 - PERSONNEL

POLICY NUMBER: 3.11

DATA PROTECTION AND GENERAL DATA REGULATION POLICY

EFFECTIVE FROM: 5/VIII/22

REVIEWED: 18/V/23

NEXT REVIEW DATE: Summer 2024

THE BRITISH SCHOOL OF MONACO

Data Protection and General Data Regulation Policy

The British School of Monaco believes that the school complies with the current general data protection regulations (GDPR) in Monaco. We understand that under the GDPR:

- data management is strengthened and unified;
- it will become illegal not to have a formal contract or service level agreement with a chosen data processor;
- the data processor must be GDPR compliant;
- there will be higher penalties for non-compliance with the GDPR;
- data breaches must be reported within 72 hours;
- individuals have greater control over their personal data.

The British School of Monaco is committed to the protection of all personal and sensitive data for which it holds responsibility as the data controller. The British School of Monaco believes the handling of such data is in line with the data protection principles and that access to such data does not breach the rights of the individuals to whom it relates.

The British School of Monaco acknowledges the GDPR's definition of personal data as 'meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier' such as name, identification number, location data or online identifier. It applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria.

What Parental Data is Collected?

- First name and surname
- Copy of ID
- Address
- Email address(es)

- Phone number(s)

Why do Parents need to Provide this Information?

For the purpose of safeguarding, assessing and monitoring students' learning progress.

Information is stored for two years after the end of the contract with the parent, unless the parent explicitly requests for it to be erased.

How is this Information Used?

The information can be shared with The British School of Monaco teaching and administrative staff. It can also be shared with the banking institution, if requested and required by law.

The British School of Monaco Collects Information for:

- Billing purposes (raising invoices)
- KYC compliance
- Confirming identity for safeguarding purposes
- Contacting the Client from time to time
- Emergency contact details

What Student Data is Collected?

- First name and surname
- Address
- Date of birth
- Email, if applicable
- Previous school name and school reports
- Pupil behaviour and attendance records
- Assessment results
- Safeguarding information, including data related to SEN assessments
- Relevant health information (allergies and/ or any meaningful information)
- Online lessons recording for safeguarding purposes.

Why does the School Need this Information?

- Student identification
- Student attendance
- Student assessment
- Monitoring each student's progress

- Safeguarding

Information is stored for two years after the end of the contract with the parent, unless the parent explicitly requests for it to be erased.

Information is shared with teaching and administrative staff. Some relevant information, such as annual reports, can be transmitted to other educational institutions and schools, especially in the case of home-schooling, but only when explicitly required and subject to parents' consent.

What Staff Data is Collected?

- First name and surname
- Copy of ID
- Address
- Email address(es)
- Phone number(s)
- Curriculum vitae
- Professional references

Why do Staff need to Provide this Information?

For the purpose of safeguarding, safer recruitment and administrative effectiveness.

Information is stored for five years after the end of the contract with the member of staff..

How is this Information Used?

The information can be shared with The British School of Monaco management, and administrative staff as necessary. It can also be shared with banking and government institutions, if requested and required by law.

The British School of Monaco Collects Staff Information to:

- Confirm identity for safeguarding purposes.
- Contact the member of staff from time to time.
- Ensure administrative effectiveness.
- Hold emergency contact details.

Data Controller:

Modelex SARL (The British School of Monaco), 2 Rue du Gabian 98000 Monaco, info@modelex.mc.

The Rights of the Parent and Member of Staff:

1. The right to be informed.
2. The right to access.
3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object.
8. Rights related to automated decision-making including profiling.

Monitoring the Effectiveness of the Policy

This policy will be reviewed according to the school's policy review schedule or when the need arises by relevant staff, the Principal and the Governing Body, taking account of students' opinions and concerns, and parental views, where appropriate.

The British School of Monaco is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and other third parties to share this commitment.