



ΕΛΛΗΝΟΡΘΟΔΟΞΗ ΚΟΙΝΟΤΗΤΑ ΑΓΙΟΥ ΠΑΝΤΕΛΗΜΟΝΟΣ  
**ΕΛΛΗΝΙΚΟ ΚΟΛΕΓΙΟ ΑΓΙΟΥ ΠΑΝΤΕΛΗΜΟΝΟΣ**

**ST. PANTELEIMON HELLENIC COLLEGE**

*Διευθυντής: Πρωτοπρ. Κωνσταντίνος Παπαγεωργίου*

660 Kenton Road, **Harrow**, MIDDX. HA3 9QN

Τηλ. 020 - 8732 2833 E-mail : headteacher@stphc.co.uk

# Data Protection Policy

## GDPR



Approved by the Headteacher

Reviewed by Ms B. Masourou : 20/12/2021

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## **1. What is the purpose of this policy**

According to data protection legislation, the St. Panteleimon Hellenic College is responsible for processing the personal information we hold. The Headteacher is the member of staff responsible responsible for data protection.

The St. Panteleimon Hellenic College is obliged to maintain and process personal data about its students, families and staff in accordance with its legal obligations. This information will be processed in accordance with the EU General Data Protection Regulation 2018 (GDPR).

The St. Panteleimon Hellenic College may from time to time be required to share personal information with other members of SLT organisations, including the Local Authority (LA), the Department for Education (DfE,) other schools, relevant bodies and professionals providing services to St. Panteleimon Hellenic College.

This policy will describe the legal framework, practices and procedures used in the St. Panteleimon Hellenic College regarding to proper collection, processing and storage of personal data that we maintain.

This document is a working document and will be updated regularly, to reflect changes in the working practices of the St. Panteleimon Hellenic College. Make sure you have access to the latest version of this document either through the website or by contacting the St. Panteleimon Hellenic College.

## **2. Why do we collect and use data?**

St Panteleimon Hellenic College is obliged by law to comply with the legislation that includes, but is not limited to, the following:

The General Data Protection Regulation 2018 (GDPR)

The St. Panteleimon Hellenic College uses the information available in order to:

- Support for Safe Recruitment procedures
- Comply with Safeguarding regulations
- Support for the teaching and learning of pupils and staff.
- Monitoring and reporting on progress and achievements
- Provide appropriate care and protection for pupils and staff
- Evaluate the quality of our services
- Comply with other legal obligations as set out in our school policies or through government guidelines

### **3. What data is covered by this policy?**

The St. Panteleimon Hellenic College recognises the following categories of data which are collected and processed. This policy applies to both personal data stored electronically and to data stored in printed files in our archiving systems. The personal data in electronic form are stored in a separate external electronic memory bank exclusively for the purposes of the St. Panteleimon Hellenic College.

Personal data in hard copy are locked to a designated supervised location and is only accessible only by the Headteacher or SLT members under the supervision of the Headteacher.

Personal data is information related to an identifiable, living person, this may include information related to the electronic identity, such as usernames or IP addresses.

Sensitive personal data is defined as a specific category of personal data (refer to GDPR Article 9). This may include the processing of genetic data, biometric data and health data.

## 4. What are the key principles and lawful reasons used to process data?

The St. Panteleimon Hellenic College recognises that personal data can only be processed legally, as follows:

- To allow the performance of a duty performed in the public interest or during the exercise of public authority assigned to the auditor for the execution of the duties of the St. Panteleimon Hellenic College.
- To operate according to Safe Recruitment guidelines.
- To protect the vital interests, health or well-being of an individual.
- To comply with the legal obligations of our policies or government guidelines.
- To deliver a contract, or take the necessary steps to enter into a contract.
- For the pursuit of other legitimate interests pursued by the Data Controller or a third party
- With the consent of the interested party, which has been obtained legally.

## 5. What personal data is collected?

The St. Panteleimon Hellenic College can collect and process the following personal data concerning students or their families:

- Personal information — e.g. names, addresses, date of birth.
- Family contact information including further emergency contact details.
- Features that include ethnicity, language, nationality, country of birth, religion, and photos for identification.
- Attendance information including absences and reasons for absence.
- Assessment information, including grades used to measure learning, development and progress.

- Medical history and information relevant to health & wellbeing such as allergy information.
- Information regarding identified Special Educational Need & Disability (SEND)
- Behavioural information, including exemptions and incident reports.
- Provide information related to Safeguarding or to the protection of the safety or best interests of children, including data on care and social services, legal or judicial communications and information provided by relevant bodies.

The St. Panteleimon Hellenic College may collect and process the following personal data concerning its employees:

- Personal information — e.g. names, addresses, date of birth.
- Features that include ethnicity, language, nationality, country of birth and photos for identification.
- Attendance information including absences and reasons for absence.
- Employment & Contract details such as qualifications, criminal records checks, references, employment history, trade union status, religion and financial data such as bank details & tax information.
- Medical history and information related to health & wellbeing, such as disability or allergy information.
- Performance management information, such as ratings or disciplinary records.
- Assessment files such as lesson observation files.

## **6. What is meant by obtaining lawful consent?**

St Panteleimon Hellenic College can identify additional uses of your data, which may benefit your child or the school community. Examples may include optional extra-curricular activities, events or fundraising.

## **7. Will personal data be shared?**

The St. Panteleimon Hellenic College will share personal data with local authorities and legal bodies who have by law the right of access to such data. The St. Panteleimon Hellenic College can also share personal data with:

- Other schools, educational bodies and visiting education specialist professionals.
- The NHS and Health professionals.
- Special Educational Needs (SEN) support professionals.
- Service providers such as finance, payroll, catering, payment processing and ICT
- Social and welfare services, including the Police.

The information disclosed may include sensitive personal information such as information on health, special educational needs, or disabilities. This information is used to provide the right services to support children, families or employees and is only disclosed on the basis of a strict need for knowledge in full compliance with individual rights.

The St. Panteleimon Hellenic College is obliged by law to check the identity and the Criminal Records.

The St. Panteleimon Hellenic College will conduct checks using the Disclosure and Barring Service (DBS). To perform these checks, **authorised** persons are required to share sensitive personal data with DBS.

The Personal Data will be processed by DBS and the results of this processing are provided to the St. Panteleimon Hellenic College. You can read the privacy notes provided by DBS on the gov.uk website.

## **8. How do we use photography and video?**

The St. Panteleimon Hellenic College recognises that the recording images of identifiable individuals is a form of processing of personal information that must be carried out in accordance with data protection requirements.

## **9. Will personal data be published?**



The St. Panteleimon Hellenic College will not publish personal data, including photographs or images, in public forums either online or in print without having previously obtained explicit consent.

## **10. How long is personal data stored for?**

Personal data is not kept on a permanent basis and is stored only for as long as is necessary to fulfill their intended purpose. Personal data is deleted when it is no longer needed. Some educational records related to former students or school staff can be kept for a long time for legal reasons, but also for example to be able to provide recommendations.

Printed documents will be safely discarded e.g. fragmented and the electronic data are permanently deleted when the data is no longer required.

## **11. Who is accountable for data protection?**

The St. Panteleimon Hellenic College appoints the Headteacher as its representative in matters of data protection.

## **12. How is personal data processed and protected?**

The St. Panteleimon Hellenic College ensures that the appropriate technical measures and procedures are applied to protect the data and privacy of individuals.

## **13. What are your rights regarding your personal data?**

The St. Panteleimon Hellenic College recognizes the rights of individuals regarding the use of their personal data by us, a list of your rights is as follows:

- The right to information
- The right of access
- The right to correction

- The right to delete
- The right to restrict processing
- The right to data portability

The St. Panteleimon Hellenic College will ensure that these rights are respected by ensuring that all our policies and procedures regarding the processing and storage of data are compatible with these rights.

In addition to the rights listed above, individuals have additional rights regarding the automated processing of their personal data.

The St. Panteleimon Hellenic College does not use any automated decision-making for data processing, nor does it undertake automated personal profile creation.

## **14. What happens when there is a breach of your privacy?**

The St. Panteleimon Hellenic College will use practical and technical measures to protect personal data from loss or any other unauthorized modification, disclosure or access.

In the event of a breach of confidentiality as described above, the Head will take the following steps:

- Assess the nature of the personal data breach, including the relevant data categories and the approximate number of people and files affected
- Determine if the violation is likely to lead to any risk to the rights and freedoms of individuals. The risk of the breach having detrimental consequences for individuals and the need to notify the competent supervisory authority will be assessed on a case-by-case basis.
- Report all reported violations to the Office of Information Commissioners within 72 hours of the St. Panteleimon Hellenic College becoming aware.
- If a violation is likely to lead to a high risk to an individual's rights and freedoms, St. Panteleimon Hellenic College will inform those concerned promptly and without undue delay.

Assess the nature of the personal data breach, including the categories of data involved and the approximate number of people and files affected

- Determine if the breach is likely to lead to any risk to the rights and freedoms of individuals. The risk of the breach having detrimental consequences for individuals, and the need to notify the competent supervisory authority will be assessed on a case-by-case basis.
- Report all notifiable violations to the Information Commissioners Office within 72 hours of the St. Panteleimon Hellenic College becoming aware.
- If a breach is likely to lead to a high risk to the rights and freedoms of an individual, St. Panteleimon Hellenic College will inform those concerned immediately and without undue delay.

## **15. How do you request access to view your personal data?**

According to data protection legislation, any person for whom the St. Panteleimon Hellenic College requests for access to your personal information must be recorded in writing and addressed to the Headteacher.

## **16. How do you raise a concern about the way we process personal data?**

If you are concerned about the way we collect or use your personal data, we invite you to report the matter to us first by speaking to the Headteacher.

## **17. When will this policy be updated?**

This policy will be reviewed at least once a year by the St. Panteleimon Hellenic College.

This policy is a working document and can be updated to reflect changes in the work practices of the St. Panteleimon Hellenic College at any time.