

Sky School Data Protection Policy

1. Introduction

This policy sets out Sky School's organisational approach to data protection. Sky School is committed to protecting the privacy of all individuals (including employees and volunteers) and service users who come into contact with it. In order to carry out its work, Sky School needs to collect and use certain types of information about these individuals or service users ("data subjects"). This personal information must be collected and dealt with appropriately, whether it is collected on paper, stored in an electronic database, or recorded on other material.

As a limited company in the UK, Sky School operates under UK data protection law, which is in line with EU data protection law and which provides one of the world's highest benchmarks for data protection. This policy sets out Sky School's top level approach to Data Protection Act 1998 ("the Act") and associated regulations. This policy is complemented by specific privacy policies, statements and training for different activities undertaken by Sky School so there are appropriate safeguards that ensure that the processing of personal data is carried out appropriately under the Act.

2. Data Controller and Data Protection Officer

Sky School is a Data Controller under the Act, which means that it determines the purposes for which and the manner in which any (sensitive) personal data is, or is to be, processed. It is also responsible for notifying the Information Commissioner's Office ("ICO") of the types of data it holds or is likely to hold, and the general purposes that this data will be used for.

Sky School has appointed a Data Protection Officer, Polly Akhurst, who is responsible for Sky School's compliance with the Act, training staff and volunteers appropriately, and responding to requests from the ICO, constituents or data subjects.

3. Overall Approach

Sky School intends to ensure that personal or sensitive personal data is treated lawfully and correctly. We regard the lawful and correct treatment of (sensitive) personal data as critical to successful working and to maintaining the confidence of those we serve. To this end, Sky School will adhere to the principles of data protection ("Principles") as detailed in the Act.

Specifically, these Principles require that personal data:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes
3. Shall be adequate, relevant and not excessive in relation to those purposes

4. Shall be accurate and, where necessary, kept up to date
5. Shall not be kept for longer than is necessary
6. Shall be processed in accordance with the rights of data subjects under the Act
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of or damage to personal information
8. Shall not be transferred to an entity outside the European Economic Area unless that entity ensures an adequate level of protection for the rights and freedoms of Data Subjects in relation to the processing of personal information.

4. Data collection and usage

Sky School will process personal data where needed to carry out its activities. Sky School understands the wide definition of “processing” and notes that it includes collecting, amending, handling, storing and disclosing personal information.

The data Sky School will process will be personal data, which is information about a living individual from which they are identifiable (either from that piece of information or in conjunction with other personal data held) and that can include contact information, location, age and sex. Sky School will not collect sensitive personal data. If Sky School does wish to collect personal data, this policy will be amended.

Where personal data is processed, at least one of the following specific conditions will be met:

- The data subject has given their consent to the processing
- The processing is necessary for the performance of a contract to which the data subject is a party or for the taking of steps at the request of the data subject with a view to entering into a contract
- The processing is necessary for compliance with any legal obligation to which Sky School is subject, other than an obligation imposed by contract
- The processing is necessary in order to protect the vital interests of the data subject
- The processing is necessary for the administration of justice, for the exercise of any functions of government or any other functions of a public nature exercised in the public interest
- The processing is necessary for the purposes of legitimate interests pursued by Sky School or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject.

Sky School acknowledges that it will largely (but not solely) be relying upon the first two conditions.

Consent

When collecting data requires (explicit) consent, Sky School will ensure that it provides sufficient information to the data subject, so as to make sure the consent is valid. Sky School will consider the following points to design the necessary procedures and privacy statements for each type of processing where consent is required:

- The data subject has received sufficient information on and clearly understands why their data is needed, how it will be used, and what for
- The data subject understands what the consequences are, should they decide not to give consent to processing
- As far as reasonably possible, the data subject grants explicit written or verbal consent for data to be processed
- The data subject is, as far as reasonably practicable, competent enough to give the consent described above, and has given this freely without any duress.
- Sky School will also consider what other information should be included in any specific privacy notices/statements in order for data subjects to feel empowered and aware of how their (sensitive) personal data is used by Sky School.
- Sky School understands that the collection of personal data relates to specific purposes for which it was collected. Sky School will not process personal data for purposes other than or additional to those it was collected for.

5. Data storage, security and accuracy

Sky School will actively encourage data subjects to keep their data up to date and accurate, and will ensure that there are easy methods by which they can do this. Sky School will also ensure it undertakes appropriate checks to ensure data is kept up to date and accurate. Information and records relating to data subjects will be stored securely and will only be accessible to authorised staff and volunteers as is necessary for them to perform their job functions.

Information will be stored for only as long as it is needed or required, and will be disposed of appropriately. As such, different time periods for retention will apply depending on the type of personal data and the reason for its processing. Sky School will implement appropriate security measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, including through the transmission or storage on or within a network.

These security measures include:

1. Industry standard firewall and other network security features such as well encrypted cloud or physical server systems
2. Clear guidelines for staff and volunteers on device and network security expectations placed on them
3. Robust data backup and recovery processes provided by leading industry suppliers
4. Periodic security audits of online systems.

In case of accidental or unauthorised access, Sky School will notify both the ICO and the data subjects if there is likely to be a high risk to the rights and freedoms of the data subject as a result of the data breach.

It is Sky School's responsibility to ensure that all personal and company data is nonrecoverable from any electronic or paper systems previously used within the organisation that have been passed on, sold to a third party or discarded. Sky School will provide regular training on the Act to ensure this policy and other specific procedures relating to the processing of (sensitive) personal data are understood and enacted by staff and volunteers. Everyone processing personal data must understand that they are contractually responsible for following good data protection practice. All staff and volunteers will be made aware that a breach of the rules and procedures relating to the Act may lead to disciplinary action being taken against them.

6. Data access

Under the Act, all data subjects have the right to access the information Sky School holds about them and to demand Sky School removes their (sensitive) personal data from their records or stops processing their data, by contacting the Data Protection Officer. Sky School will ensure that access to its Data Protection Officer is publicly available.

In addition, Sky School will ensure that:

1. It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
2. Anybody wanting to make enquiries about handling personal information is offered a clear pathway to make their enquiries
3. It deals promptly and courteously with any enquiries about handling personal information and in line with timeframes and principles set out under the Act
4. It describes clearly how it handles personal information
5. Treat people justly fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information

7. Data Sharing (including outside of the European Economic Area)

Sky School will occasionally share data with partner organisations, if the sharing of certain data is necessary for carrying out a project that has been agreed upon through a signed agreement, MoU or contract. Sky School may share information with these entities on the condition that they have data protection policies in place that are up to the standard of the Act and comply with Sky School's Data Protection Policy and in accordance with local laws. Sky School therefore undertakes to establish Data Sharing Memoranda of Understanding with these entities. Personal data will only be shared in support of the Sky School mission and Sky School shall not buy from or sell data to external organisations.

8. Disclaimer

This policy is subject to UK legislation. If UK data protection legislation or the Act change and these changes affect this policy, they will override the policy. This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Act. All other procedures or privacy statements that compliment this policy will also be updated as necessary at any time.

=====