

# Fair Processing Notice

## **The Headteacher in the name of Ballakermeen High School as Data controller**

The Headteacher, in the name of Ballakermeen High School, is a data controller for the purposes of the Data Protection Act 2002/General Data Protection Regulation (Isle of Man) Order 2018. The contact details for the Data Controller are Ballakermeen High School of St Catherine's Drive, Douglas, Isle Of Man IM1 4BE.

In addition to the information set out in the Isle of Man Privacy Notice, we may also collect the following information about your child as required by the Education Act 2001 and the Registration of Pupils Regulations 2016:

1. full legal name and where known, any former name or names;
2. gender;
3. date of birth;
4. unique pupil number;
5. ethnic group and by whom that information was provided;
6. first language;
7. date of admission to the school;
8. year group;
9. the address and postcode of the pupil's usual residence and any other properties at which the pupil is also known to reside on occasion;
10. the name and address of every person known to the school to be a parent of the pupil and at least one emergency contact telephone number;
11. the name and address of any other schools the pupil is known to have attended, if any, and in the case of guest registration, any other schools at which the pupil is registered;
12. full-time or part-time;
13. day pupil or boarder;
14. date of leaving the school;
15. usual mode of transport to and from school;
16. for any pupil who is known to the head teacher to be or to have been looked after by an appropriate organisation, the name of that organisation;
17. (where applicable) that the pupil has been found eligible for free school meals;
18. Attendance;
19. Medical information for the vital interests of children where appropriate;
20. Educational psychologists reports and supporting documents;
21. Academic achievements;
22. Skills and abilities;
23. Educational progress;
24. Special educational needs information;
25. Suspension information;
26. Course information;

The Data Protection Officer for the Department of Education, Sport and Culture is: Andrew Shipley, Department of Education, Sport and Culture, Hamilton House, Douglas. IM1 5EZ. Tel 01624 685828. Email: DPO-DESC@gov.im.

# How we will use the information we collect about you

Ballakermeen High School may use your information to:

- register your child at the school;
- record attendance information;
- produce an educational record containing:
  - Information about your child
  - Personal education plans
  - Educational psychologist's reports and accompanying documents
- produce a curricular record containing:
  - Academic achievements;
  - Skills and abilities; and
  - Educational progress
- produce a record of special educational needs and special needs provision, if appropriate detailing:
  - The type of special need;
  - A ranking of the special needs if there is more than one;
  - The special needs provision being made; and
  - Whether teaching is in a special education needs unit or elsewhere
- record details of suspensions
- produce a record of the studies undertaken;
- help prevent and detect crime

Ballakermeen High School has a statutory obligation to check and verify the data you provide to us on registration documents and on consent forms. This may include checks of publicly available information but in some cases, where it is necessary and relevant, the information you provide may be disclosed or shared with other organisations.

## How we will share the information we collect about you

App or Service	Details	Consent Required
<b>DESC Attendance</b>	<p><b>Data Shared:</b> Name, School, Attendance data if less than 80%</p> <p><b>Sharing Basis:</b> Public interest + official authority of the DC</p> <p><b>Security Protocols:</b> Secure access or information sent by email password protected</p> <p><b>Server/Data Location:</b> EEA</p> <p><b>Retention Period:</b> As needed while resolving issues</p>	No
<b>DHSC School / Community Nurses</b>  <a href="#">more information</a>	<p><b>Data Shared:</b> Child's name, date of birth, current address, previous address, current school and previous school</p> <p><b>Security Protocols:</b> Information sent password protected with the password sent via an alternative means of communication</p> <p><b>Server/Data Location:</b> EEA</p> <p><b>Retention Period:</b> Current year</p>	Yes
<b>employed.im</b>  <a href="#">more information</a>	<p><b>Data Shared:</b> Name, email, password. Information data subject supplies.</p> <p><b>Sharing Basis:</b> Public interest + official authority of the DC</p> <p><b>Access Conditions:</b> Supervised and unsupervised</p> <p><b>Teacher Access:</b> Limited access to enable placements</p> <p><b>Server/Data Location:</b> IOM</p> <p><b>Retention Period:</b> For as long as data subjects wish to use the services</p>	No
<b>Evolve</b>  <a href="#">more information</a>	<p><b>Data Shared:</b> Name, contact details, trip information and risk assessments</p> <p><b>Sharing Basis:</b> Public interest + official authority of the DC</p> <p><b>Security Protocols:</b> Advanced firewalls, enterprise-level virus protection on all servers, HTTPS encryption for all communication between our servers and users, regular data backup, username/password/PIN to control access, failed log-in attempt logging, automatic suspicious activity detection and logging</p> <p><b>Server/Data Location:</b> UK</p> <p><b>Retention Period:</b> Current year + 6 years</p>	No

<p><b>Facebook</b> <a href="#">more information</a></p>	<p><b>Data Shared: Photos, names</b></p> <p><b>Security Protocols: Password protected, Two-factor authentication.</b></p> <p><b>Server/Data Location: Worldwide including the US</b></p> <p><b>Retention Period: Current year</b></p>	<p><b>Yes</b></p>
<p><b>Google</b></p>	<p><b>Data Shared:</b> No personal information should be stored on Google servers by staff apart from a name, class grouping, email address and information regarding work completed or to be completed</p> <p><b>Sharing Basis:</b> Public interest + official authority of the DC</p> <p><b>Security Protocols:</b> Google adheres to several self regulatory frameworks, including the EU-US Privacy Shield arrangement.</p> <p><b>Access Conditions:</b> No</p> <p><b>Teacher Access:</b> Limited to areas set up by staff such as Google Classrooms and shared areas</p> <p><b>Server/Data Location:</b> Worldwide including the US</p> <p><b>Retention Period:</b> DOB + 21 years or 3 years since the last log on</p>	<p><b>No</b></p>
<p><b>ItsLearning</b></p>	<p><b>Data Shared:</b> Name, class, school work</p> <p><b>Sharing Basis:</b> Public interest + official authority of the DC</p> <p><b>Security Protocols:</b> Username and password</p> <p><b>Access Conditions:</b> No</p> <p><b>Teacher Access:</b> Yes</p> <p><b>Server/Data Location:</b> EEA</p> <p><b>Retention Period:</b> End of Use + 12 months</p>	<p><b>No</b></p>
<p><b>RIDDOR</b> <a href="#">more information</a></p>	<p><b>Data Shared:</b> Name, age, gender, school, address, phone number, injury</p> <p><b>Server/Data Location:</b> IOM</p> <p><b>Retention Period:</b> DOB +25 years</p>	<p><b>No</b></p>
<p><b>SIMS</b></p>	<p><b>Data Shared:</b> Pupil record</p> <p><b>Sharing Basis:</b> Public interest + official authority of the DC</p> <p><b>Security Protocols:</b> Secure servers hosted within Government data centre. Secure connections from within approved areas of Government. Teachers access via secure VPN from approved device only.</p> <p><b>Server/Data Location:</b> EEA</p> <p><b>Retention Period:</b> DOB + 25 years</p>	<p><b>No</b></p>

<b>Twitter</b> <a href="#">more information</a>	<b>Data Shared:</b> Photos, names, achievements, event details, location, IP address <b>Server/Data Location:</b> Worldwide <b>Retention Period:</b> Public	Yes
<b>Youtube</b> <a href="#">more information</a>	<b>Data Shared:</b> Image or voice, Name <b>Access Conditions:</b> Supervised and unsupervised <b>Server/Data Location:</b> Worldwide	Yes

For more specific details about retention periods see the [Department's retention schedule](#)

Information obtained or disclosed by third parties will not be used for any other purpose other than supporting the delivery of teaching and learning.

Failure to provide information may impact on support in school, the quality of teaching and learning and in achievement in examinations.

## Protecting your information

Ballakermeen High School will:

- keep your information safe and secure in compliance;
- only use and disclose your information as detailed above where necessary
- Retain the information for no longer than is necessary and your information will be permanently deleted once the timeframes set out below have been reached (there will need to be an authorisation process, to dispose of this in line with our Records Management Policy and retention periods as outlined below (unless there is an over-riding reason to retain this information).

## Transfer of Information outside the EEA

Apps and services that are used in school may require data to be stored on servers outside of the EEA. Information sent to these will be limited and are as detailed above.

## More Information

You can find out more information including:

- Looking at the Isle of Man Government Privacy Policy here <https://www.gov.im/about-this-site/privacy-notice/> [Accessed 16/1/18]
- Contacting our Data Protection Officer who is: Andrew Shipley, DPO. Hamilton House, Peel Road. Douglas. IM1 5EZ. Tel 685828. Email DPO-DESC@gov.im
- Asking to see your information or making a complaint if you feel that your information is not being handled by contacting the Headteacher as Data Controller for Ballakermeen High School
- Making a subject access request which is a request for all of the personal data we hold about you.
- Obtaining this information in large print, braille, or in an alternative language.

# Your rights

You have a right to access your personal data to ensure that it is accurate, and to request that it is rectified, blocked, erased or destroyed if it is inaccurate.

To make any request relating to your data held by us, please contact the Data Protection Officer for the Department of Education, Sport and Culture who is: Andrew Shipley, DPO. Hamilton House, Peel Road. Douglas. IM1 5EZ. Tel 685828. Email DPO-DESC@gov.im

If you are not satisfied with the response you receive, you may also complain to the Information Commissioner, whose details can be found on [www.inforights.im](http://www.inforights.im), or the relevant supervisory authority. You may have a right to other remedies.