



## PERSONAL INFORMATION & DATA PROTECTION POLICY

*Reviewed: January 2019*

*Next review due: January 2020*

King Stage Learning Centre is committed to making sure that the privacy and personal information of our data subjects (students, staff and service providers) is protected. The protection of privacy and personal information is important to us.

This **Personal Information and Data Protection Policy** describes how we respond to data subject access requests and breaches of personal data.

Our separate **Data Privacy Statement** describes how we take responsibility for the data in our care and the fair information practices that we apply to the use of data at King Stage Learning Centre. It explains what information we collect, how we use this information, how our data subjects can tell us if they prefer to limit the use of their information, and the procedures that we have in place to safeguard their privacy. Our **Social Media Policy** describes how we undertake to use digital images and film in a responsible and appropriate way.

Our **Personal Information and Data Protection Policy** and **Data Privacy Statement** have been developed to comply with the General Data Protection Act (GDPR) 2018.

King Stage Learning Centre is Controller of the data we collect, and Processor of the data we receive.

### The Principles

King Stage comply with the Data Protection Principles (the Principles) contained in the Data Protection Act to ensure all data is:-

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries without adequate protection

### Personal Data

Personal data covers both facts and opinions about an individual where that data identifies an individual. For example, it includes information necessary for employment such as the member of staff's name and address and details for payment of salary or a pupil's attendance record and test results. Personal data may also include sensitive personal data as defined in the Act.



## **Processing of Personal Data**

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

Pupils consent to process their data and disclose it to parents is implicit when they reach the age of 18. If a pupil wishes to revoke or change consent they must agree a specific agreement on how their data is to be processed with the data processor.

## **Sensitive Personal Data**

King Stage may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

## **Exemptions**

Certain data is exempted from the provisions of the Data Protection Act which includes the following:-

- National security and the prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon King Stage, including Safeguarding and prevention of terrorism and radicalisation.

## **Accuracy**

King Stage will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

## **Data Security**

King Stage will take appropriate technical and organisational steps to ensure the security of personal data. All staff will be made aware of this policy and their duties under the Act.

King Stage and therefore all staff and pupils are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data. An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite. Other personal data may be for publication or limited publication at King Stage, therefore having a lower requirement for data security.



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## **Secure Destruction**

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.

## **Retention of Data**

King Stage may retain data for differing periods of time for different purposes as required by statute or best practices, individual departments incorporate these retention times into the processes and manuals. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

King Stage may store some data such as registers, photographs, exam results, achievements, books and works etc. indefinitely in its archive.

## **CCTV**

King Stage owns and operates a CCTV network for the purposes of crime prevention and detection, and Safeguarding.

## **Personal Data Request**

Data subjects have the right to request King Stage checks, changes or erases their personal data, provided it is not held for legal reasons. This request should be made to:

Roberta TOLU, Administrative head

roberta@king-stage.com

Unit8 Greenwich Quay – London SE83EY

T: +44 2086946165

The time to process your request will be 30 days.

## **Notification of Personal Data Breaches**

A data breach is when personal data is no longer held securely, and leads to its accidental, unauthorised or unlawful loss, destruction, alteration, transmission, disclosure or access. In the case of a data breach, King Stage will:

- Provide the Information King Stage's Administrative head within 48 hours of the incident
- Inform the data subject affected as soon as reasonably possible, provided that this does not damage the rights and freedoms of others
- Keep a data breach register to record the incident and the steps we take to regain security.