

Giovanni Curmi Higher Secondary School **DATA PROTECTION POLICY**

General Statement

The Giovanni Curmi Higher Secondary School (GCHSS) complies with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act (Cap. 586) which regulate the processing of personal data whether held electronically or in manual form. This school requires to process personal data to comply with legal obligations under the Education Act (Cap. 605), the Processing of Personal Data (Education Sector) Regulations (S.L. 586.07) and all other statutory provisions.

Processing includes obtaining, recording, holding, accessing, disclosing or using personal data. The Head of school, being the data controller in terms of the Data Protection Act, has overall responsibility for ensuring that records are correctly processed. All staff within the GCHSS involved with such processing are aware of their duties and responsibilities in line with this policy.

Processing Purposes

This school processes personal data in relation to students and parents or legal guardians for the following purposes:

- a) Administration:-
Student and parent / legal guardian details are collected upon registration of a student to attend this school or upon admission of a student to this school. Such registration details are required to establish a student register for the administration of the intake of yearly students, and for the daily operations and efficient running of the school. Student records may also include photographs. The student details will incorporate the details of their parents / legal guardians to be contacted as necessary and to maintain a sound relationship with them, by involving them in the educational development of their child attending this school. Parents / legal guardians may also participate in school activities in the interest of their children. It is the responsibility of parents / legal guardians to provide the school with any amendments or changes to the registration details of our students to keep such information up to date.
- b) Academic progress monitoring:-
This school is committed to provide the best education possible to its students. Performance data, including examination and / or assessment results are compiled and associated with student records, to monitor their progress during the scholastic years.
- c) Organisation of school functions:-
The school organises activities from time to time to promote students' achievements, and give them exposure to certain field work to develop further their potential and abilities. The functions may form part of curricular requirements (such as prize day, graduation day, parents' day, religious functions, sports day, etc.) or may be of a non-curricular nature (such as outings, exhibitions, Christmas parties, etc.). In all functions, data of students and their parents / legal guardians may be processed for this purpose. Consent will be sought for processing of personal data related to non-curricular activities.
- d) Historic records:-
Selective records processed for the above mentioned purposes (administration, academic and school functions) may be archived and kept for historic and record purposes.
- e) Student welfare:-

The school may process records related to the welfare and social behaviour of the student concerned. Such information may include court orders regarding custody of minors, information compiled by child protection services including guidance and counselling, as well as any other information obtained from the student or parent / legal guardian, law enforcement officers, and other support agencies including Appogg, Sedqa, and Caritas. Such welfare data is processed in the best interest of the student concerned in order to provide him / her with the best possible protection and assistance, to improve his / her welfare, and further progress the development of the student involved.

f) Health:-

Medical examinations may be carried out by state doctors, nurses, psychologists / statementing board members and other health professionals to monitor the state of health of the students attending this school. Other health related information may also be provided by the parent / legal guardian themselves as a preventive measure.

g) Statistics and research

Personal data processed for statistical and research purposes are made anonymous. Where data is required for research related to students, consent is sought from the parent / legal guardian or the students themselves when they are 16 years of age prior to its disclosure only when the research / statistics will not be rendered anonymous.

Processing of visual images

The GCHSS allows the taking of visual images in the form of photos, videos or other means, in its school activities. It is pertinent to point out that the school is only responsible for visual images taken by school representatives. Persons taking visual images for personal use during a school activity are responsible for the use of such visual images. Where a public event is held in the school and such event is covered by the press, the latter will be data controllers in relation to the visual images. In such cases, while the reporter shall enquire with the Head of School whether there are any objections to visual images of particular children, the Head of School or his representative would also point out any such objections to the press where possible.

Upon the admittance of students in this school, consent will be sought from parents / legal guardians or students over the age of sixteen when applicable, where visual images are:

- used for communications purposes by publishing them on:-
 - printed matter including internal and external publications (e.g. school magazines, annual reports, newsletters, etc),
 - school notice boards (except to process orders by students),
 - media – including newspapers and TV,
 - the internet (school and Education Division web sites and social media);
- used for any other purpose other than administrative, school functions, historic and communications purposes.

The consent given may be withdrawn after informing the head of school in writing.

When a professional photographer is engaged by the school, the school shall ensure that the photographer understands data protection considerations and that he/she is capable to satisfy all responsibilities and obligations in accordance with the relevant legislation. This relationship will be regulated by a contract between the school and the photographer.

Visual images are retained for a period of three years except for those selected to be kept for historic records of the school.

Recipients of data

Personal data will not be disclosed to other third parties without the consent of the parent / legal guardian / student where applicable, unless permitted by law and unless it is in the best interest of the student. Personal data will therefore be accessed and disclosed as follows:

- a) Access:-
Restricted staff members of the school will access personal data on a need to know basis in the course of executing their duties. The professional staff requiring such data is fully aware of the obligations the school has under the relevant legislation, and they will only use the data for the purposes for which it was collected.
- b) Disclosure:-
The school endeavours to inform students and their parents / legal guardians when there is a possibility that personal data may be disclosed to third parties, and will ask for consent where applicable. However, there are instances where personal data will have to be disclosed without consent to third parties as per relevant legislation.

Student and Parent / Legal Guardian Rights

Students and parents / legal guardians are entitled to be provided with:

- a) actual information processed about them;
- b) how the data was collected;
- c) the purpose for processing such information;
- d) details about the recipients to whom data is disclosed;
- e) Retention period.

The request has to be made in writing and addressed to the head of school. Requests concerning students under the age of sixteen are to be signed by their parents / legal guardian on behalf of the students. Students who have attained their sixteenth birthday may sign the request themselves.

The school aims to comply as quickly as possible with requests for access to personal information and will ensure that it is provided within a reasonable time, unless there is a good reason for delay. When a request for access cannot be met within a reasonable time, the reason will be explained in writing to the parent / legal guardian or student making the request.

In the event that personal data prove to be incorrect, the parent / legal guardian or student concerned may request to rectify, erase or not to use the information in question.

Retention of Personal data

Please refer to the GCHSS Data Retention Policy.

Enquiries

All enquiries related to this school's Data Protection Policy are to be addressed as follows:

Mr Gaetano Calleja
Head of School

Giovanni Curmi Higher Secondary School
N/S in Main Street Naxxar
NXR1971

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