



Data Protection Policy

Reviewed: May 2024

Review Frequency: 2 years

Next Review: May 2026

Governor sign off: Yes/No

1. Scope

- 1.1 For the purposes of this procedure, 'The School' will refer to The King's School Vattnacville located in Cambodia.
- 1.2 The School will ensure that its data protection standards match as far as is possible the data protection standards in the UK.
- 1.3 This document is primarily aimed at staff and describes the responsibilities and procedures in place for ensuring compliance with data protection law and The King's School Privacy Notice.
- 1.34 This document sets expectations of The King's School Vattnacville employees and governors who handles the personal data of our data subjects (including parents, pupils, employees, contractors and third parties).

2. Objectives

2.1 To ensure The School adheres to the following principles when processing personal data:

- processed lawfully, fairly and in a transparent manner;
- collected and used for specific and explicit purposes;
- relevant and limited to what is necessary for the purposes for which it is processed;
- accurate and kept up to date;
- kept for no longer than is necessary for the purposes for which it is processed;
- processed in a manner that ensures appropriate security of the personal data.

3. Responsibilities

3.1 The Senior Leadership Team (SLT) is responsible for:

- Ensuring competent staff are appointed and provided with the necessary resources to implement and maintain data protection systems, policies and procedures.
- Ensuring staff joining the school are provided with data protection information and training appropriate to their job role;
- Ensuring the third party processors to whom data is passed provide evidence of data protection compliance.

3.2 The Operations Manager is responsible for:

- Fulfilling the role of Data Protection Controller for The School;
- Ensuring arrangements are in place for fulfilling the requirements of data protection systems, policies and procedures;
- Co-ordinating the School's on-going compliance with data protection law including:
- review and update of The School's documentation;
- staff training and briefing.

3.3 The Director of IT is responsible for:

- Ensuring the highest possible level of security for all data; this includes firewalls / e-mail security / Azure Security / password security and multifactor authentication (MFA) on all accounts.

- Ensuring all network devices are regularly patched with security updates.
- Ensuring annual penetration testing is carried out to confirm security posture.
- Ensuring separation of back up from live data to prevent ransomware attacks from infecting back up.
- 3.4 The Education Visits Co-ordinators (EVCs) are responsible for:
 - Ensuring trip organisers digitalise pupils' personal information;
 - Ensuring that data is appropriately password protected.
- 3.5 The Human Resources Department is responsible for:
 - Maintaining records of staff data protection training.

3.6 All staff are responsible for:

- Completing data protection training assigned to them;
- Ensuring data subjects with whom they are working are informed of where to view The King's School Vattancville Privacy Notice;
- Informing the School if they believe any personal data is inaccurate or untrue;
- Recording every document or e-mail in a form they would be prepared to stand by should the person about whom it was recorded ask to see it;

4. Associated Documents

4.1 This procedure should be read in conjunction with the following:

- Privacy Notice
- Acceptable Use Policies
- E Safety Policies
- Taking, Storing and Using Images of Children Policy