

# HELVETIA HOUSE SCHOOL DATA PROTECTION POLICY

Helvetia House School is registered as a 'Controller' under the Data Protection (Jersey) Law 2018 as we collect and process personal information about you. We process and hold your information in order to provide public services and meet our statutory obligations. This policy explains how we use and share your information. Information may be collected on a paper form, by telephone, email, or by a member of our staff, or in some cases, by another Government department.

We will continually review and update this privacy notice to reflect changes in our services and feedback from service users, as well as to comply with changes in the law

## WHAT

### What information do we collect about you?

We collect the following types of information from you:

- Name of child and parent / carer
- Date and place of birth of child
- Address of child and parent / carer
- Child's position in family and dates of birth of brothers and sisters
- Contact details – phone, email
- Parents/carers' place of employment
- Emergency contact information
- Child's pre-school experience/previous schools attended
- Home circumstances
- Special religious circumstances
- Medical information that is relevant to child

## WHY

### Why do we collect information about you?

We need to collect and hold information about you, in order to:

- Stay in touch with you
- Verify you are who you say you are
- Answer your query
- Handle your application
- Provide you with information you need
- Meet our statutory obligations
- Carry out the service we provide, and to monitor and improve our performance in responding to your service request
- To ensure that we meet our legal obligations
- Where necessary for our law enforcement functions
- Where necessary to protect individuals from harm or injury
- To prevent and detect crime
- To process financial transactions including grants or payment of benefits
- To allow the statistical analysis of data so we can plan the provision of services

## HOW

### How will we use the information about you?

We will use the information you provide in a manner that conforms to the Data Protection (Jersey) Law 2018.

We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time information has to be kept. Please ask for more detail about how long we retain your information.

We may not be able to provide you with a service unless we have enough information or your permission to use that information.

We will not pass any personal data on to anyone outside of the Government of Jersey, other than those who either process information on our behalf, or because of a legal or statutory requirement, and we will only do so, where possible, after we have ensured that sufficient steps have been taken by the recipient to protect your personal data.

We will not disclose any information that you provide 'in confidence', to anyone else without your permission, except in the few situations where disclosure is required by law, or where we have good reason to believe that failing to share the information would put someone else at risk. You will be told about this unless there are exceptional reasons not to do so.

We do, on the odd occasion, process your information overseas using web services that are hosted outside the European Economic Area, for example Facebook. This is processed in the US, but has been approved by another competent supervisory authority under Article 40 of the GDPR or equivalent statutory provisions, together with binding and enforceable commitments of the controller and processor to apply the appropriate safeguards such as information security procedures and checks.

### **Data Sharing**

We may need to pass your information to other Government of Jersey (GOJ) departments or organisation to fulfil your request for a service. These departments are Health, Social Services, Social Security, Multi trust agencies. These departments and organisations are obliged to keep your details securely, and only use your information for the purposes of processing our service request. Please read Appendix A for a list of organisations your data is shared with and how.

We may disclose information to other departments where it is necessary, either to comply with a legal obligation, or where permitted under other legislation. Examples of this include, but are not limited to: where the disclosure is necessary for the purposes of the prevention and/or detection of crime; for the purposes of meeting statutory obligations; or to prevent risk of harm to an individual, etc.

At no time will your information be passed to organisations for marketing or sales purposes or for any commercial use without your prior express consent.

## Publication of your information

We may need to publish your information on our website for the following reasons:

- Where we are required by law to publicise certain information, for example performance data.
- In the interests of demonstrating a fair and transparent decision-making process, for example admissions process and appeals procedure.
- Where we are required to provide statistical information about a group of people; although your data will be anonymised to protect your identify.
- Where you have responded to a public consultation, although your comments will be anonymised to protect your identity.
- We will not publish any of your sensitive personal information unless there is a requirement for us to do so in order to carry out our statutory functions.

## E-Mails

If you email us we may keep a record of your email address and a copy of the email for record keeping purposes.

For security reasons we will not include any confidential information about you in any email we send to you. We would also suggest that you keep the amount of confidential information you send to us via email to a minimum or use our secure online services where possible or correspond with us by post.

We will not share your email address or your email contents unless is it necessary for us to do so; either to fulfil your request for a service; to comply with a legal obligation, or where permitted under other legislation.

## Telephone Calls

We do not record or monitor any telephone calls you make to us using recording equipment, although if you leave a message on our voicemail systems your message will be kept until we are able to return your call or make a note of your message. File notes of when and why you called may be taken for record keeping purposes. We will not pass on the content of your telephone calls, unless is it necessary for us to do so; either to fulfil your request for a service; to comply with a legal obligation, or where permitted under other legislation.

## Your Rights

### You can ask us to stop processing your information

You have the right to request that we stop processing your personal data in relation to any of our services. However, this may cause delays or prevent us delivering a service to you. Where possible we will seek to comply with your request, but we may be required to hold or process information to comply with a legal requirement.

### You can withdraw your consent to the processing of your information

In the few instances when you have given your consent to process your information, you have the right to withdraw your consent to the further processing of your personal data. However, this may cause delays or prevent us delivering a service to you. We will always seek to comply with your request, but we may be required to hold or process your information in order to comply with a legal requirement.

#### You can ask us to correct or amend your information

You have the right to challenge the accuracy of the information we hold about you and request that it is corrected where necessary. We will seek to ensure that corrections are made not only to the data that we hold but also any data held by other organisations/parties that process data on our behalf.

#### You can request that the processing of your personal data is restricted

You have the right to request that we restrict the processing of your personal information. You can exercise this right in instances where you believe the information being processed is inaccurate, out of date, or there are no legitimate grounds for the processing. We will always seek to comply with your request, but we may be required to continue to process your information in order to comply with a legal requirement.

#### You can ask us for a copy of the information we hold about you

You are legally entitled to request a list of, or a copy of any information that we hold about you. However, where our records are not held in a way that easily identifies you, for example a land registry, we may not be able to provide you with a copy of your information, although we will do everything we can to comply with your request

# Helvetia House School

## Appendix A

### Data Sharing with Organisations

Helvetia House School shares data with the following organisations:

- Departments within the Government of Jersey (A);
- The Police (B);
- Health Services included CAMHS, CYP Hub, MARAC and JMAPPA (C);
- Social Services (D);
- Social Security (E);
- Contact Tracing (C).

Reasons why we share data within the States of Jersey:

- (A) – For statutory obligations, for verification purposes, to provide you with the information you need, to answer your query, to approve financial transactions of bursaries; to allow the statistical analysis of data so we can plan the provision of services; To ensure that we meet our legal obligations.
- (B) - To prevent and detect crime; for statutory obligations, where necessary to protect individuals from harm or injury, where necessary for our law enforcement functions.
- (C) - For statutory obligations, to ensure that we meet our legal obligations; where necessary to protect individuals from harm or injury; provide you with information you need.
- (D) - For statutory obligations, to ensure that we meet our legal obligations; where necessary to protect individuals from harm or injury; provide you with information you need; carry out the service you have requested, and to monitor and improve our performance in responding to your service request.
- (E) – To provide you with information you need; carry out the service you have requested, and to monitor and improve our performance in responding to your service request; We will continually review and update our sharing agreements to reflect changes in our services and feedback from service users, as well as to comply with changes in the law