

INTRODUCTION

The British International School of Tbilisi is committed to maintaining high standards of confidentiality and privacy concerning the processing of personal information.

This Policy sets out the obligations of BIST and its employees when processing personal data about individuals, as well as explain the rights parents, students and staff have as determined by applicable Georgian legal codes and international best practice.

PERSONAL DATA

This policy applies to all Personal Data collected for or on behalf of the School whether in analogue form (documents and forms in writing) or digital form (such as information systems, databases and emails). The School needs to know the necessary personal data of students, parents, staff, external providers, volunteers and interns, and job applicants. Personal data can also include medical data, CCTV footage, photos and video recordings.

The legal basis for processing Personal Data

Personal Data can and will be collected, processed and stored for the enrolment and education of students, contacting parents or guardians, the employment of staff or the execution of contracts and agreements with the School. There are further lawful bases for collecting and processing Personal Data including that the School has legitimate interests in providing children with an education, safeguarding and promoting the welfare and facilitating the efficient operation of the School, without any adversarial effect on children, and protecting vital interests to prevent injury or harm. It may also process personal data to meet a legal obligation or if it is acting in the public interest.

How is Personal Data used

BIST collects Personal Data to provide a safe and caring environment. The School uses the information provided for purposes that are necessary and required to undertake the performance of the contract or agreement into which a parent or staff member has entered and, in some cases, as we are required to do by law.

In the course of its processing, the Personal Data may be disclosed to third parties to protect students' vital interests (e.g. where students and/or staff are away on trips), to allow access to examinations and curricula (e.g. Cambridge, Century, GL, etc).

For the purposes of IT hosting and maintenance, data is located on servers within the School, and where hosted external to the School the appropriate protections are in place to ensure compliance with local GDPR requirements.

Personal Data will not be retained for longer than required for its processing and reasonable subsequent data retention, subject to any limitation periods provided by the law.

In some circumstances, BIST may have to process Personal Data for other purposes that are not necessary for the performance of the contract. Where this is the case, BIST will either have a legitimate interest to do so, need to do so as there is a legal requirement, or that it is in the vital interests of the individual for the School to process or share the Personal Data. From time to time the School may ask for explicit consent to process or transfer data for reasons that sit outside those detailed herein.

Special Categories of Data

To maintain the safety and security of all stakeholders, the School must collect and process special categories of data for safeguarding, the protection of vulnerable children, and wellbeing of those within its care. This data is not disclosed or shared without explicit and unambiguous consent unless required to do so by law, or it is in the vital interests of an individual, or where not doing so would place someone else at risk.

Some categories of data such as ethnicity, age and gender may be used from time to time in forecasting and planning for educational service provision. If used in this way, Personal Data will be anonymised.

Participating in the TST AND TST SCHOOLS community

BIST is keen to ensure all individuals associated with the School can participate in the life of the community. To do so, BIST will use the Personal Data provided to make parents, students, staff, external providers, volunteers and interns aware of services, information, news, events and activities that are undertaken at or in association with the School and do so under the legal basis of legitimate interests.

BIST will invite parents, staff, service providers, volunteers and interns to sign up for information or to agree to make contact details available to other parties where necessary.

Direct Communication

When BIST contacts parents, students, staff, service providers, volunteers, interns and job applicants the School may keep a record of emails, letters and other types of correspondence. Where the School needs to communicate sensitive or confidential information, BIST may use additional and proportionate security measures to do so.

CCTV

BIST may collect information in the form of CCTV to ensure the safety and security of all persons on site. Individuals do have the right to access their images; parents also have the right to obtain images of their children. Access to these images can be requested through the Principal.

Sharing Data

The information collected is shared within the School to deliver the services required. It may also be shared with other organisations where appropriate and necessary. Sharing Personal Data will take place where BIST is required to do so by law, or where the School has explicit consent to do so or to protect the vital interests of the individual.

Publication of Images by the School

Please see the School's Image Use Policy for details on the publication of images. Please contact the Communications Office if you have specific concerns about photos being published using the privacy@schoolstrust.co.uk email address.

Collecting Data and Consent

While the majority of data provided to BIST is required for the performance of a contract, agreement or by law, some of it is provided on a voluntary basis. To comply with the GDPR best practice, BIST will inform individuals when consent is required to process the data. This consent can be withdrawn consent at any time. This must be done through contacting in writing the School Administration.

Storing Personal Student Data

BIST will retain Personal Data for as long as required by law or best educational practice (generally this is 7 years). It is widely accepted that a school should hold data on the achievements and experiences of a child for their benefit in later life should they need to access that information and thus for longer than 7 years.

Security

For the time that BIST stores and uses Personal Data, the School will ensure the appropriate security of this Personal Data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Rights over Personal Data

BIST parents, staff, service providers, volunteers, interns, and in some instances, students have the right to request access to Personal Data held about them. To make such a request, email the Principal.

Parents, staff, service providers, volunteers, interns, and in some instances, students, also have the right to have Personal Data corrected if it is inaccurate or incomplete; to have Personal Data erased (the "right to be

forgotten”) in certain circumstances; to restrict the use of Personal Data in certain circumstances; to object to the processing of Personal Data in certain circumstances - e.g. for direct marketing purposes; to object to the processing of Personal Data that is likely to cause, or is causing, damage or distress; to have in certain circumstances, to have Personal Data blocked, erased or destroyed.

Right to object to processing

As already stated above, there may be instances where parents, staff, service providers, volunteers, interns, and in some cases, students, may not want BIST to process or share Personal Data. In these cases, BIST may not be able to fulfil the contract or agreement or only do so in a limited way or be able to comply with a statutory obligation. In those instances, BIST may not be able to comply with such a request.

June 2024