Privacy Policy

The categories of pupil information we process include:

- Personal identifiers, contacts and characteristics (such as name, admission number, contact details and address)
- Sensitive characteristics (such as nationality, language fluency, religion, ethnicity and scholarship details)
- Safeguarding information (such as court orders, professional involvement and concerns) ● Additional educational needs (such as needs, provisions and professional involvement) ● Medical information (such as family doctor, doctor's notes, illness and impairments, medical events, allergies, innoculations, medication and dietary requirements) ● Attendance (Such as lesson and session attendance, number of absences, reasons for absences, previous schools attended)
- Assessment and attainment (pupil work, teacher assessments and predictions as well as external assessments such as Cambridge examinations, IELTS tests, ECDL tests, CAT4, Checkpoint)
- Behavioral information (such as achievement and behavior reports, detentions, exclusions and any alternative provisions made)
- Communications (such as records of meeting with parents and internal communications and records of meetings)
- Photography and videography (such as CCTV, marketing imagery and imagery used to allow us to communicate more effectively with parents)

Why we collect and use pupil information

The personal data collected is essential, in order to provide our pupils with an education, to carry out our contractual obligations to parents, to meet legal requirements, to monitor and report on the progress and behavior of pupils, to keep the children in our care safe and to perform the public tasks required of all schools in Romania. We also collect and use some data for marketing purposes and for promoting the activities of our school.
We collect and use pupil information, for the following purposes:

a) to support pupil learning
b) to monitor and report on pupil attainment progress
c) to provide appropriate pastoral care
d) to assess the quality of our services
e) to keep children safe
f) to meet our legal obligations
g) to promote the activities of our school
h) for public safety and the detection and prevention of crime (CCTV)

i) to provide data to the Ministry of Education, the School's inspectorate and the office of national statistics as required of all schools in Romania

Under the EU General Data Protection Regulation (GDPR), the lawful basis we rely on for processing pupil information are:

- for the purposes of (a), (b), (c) and (d) in accordance with the legal basis of <u>legitimate interest</u>: collecting the data necessary for us to be able to provide our pupils with an education and in accordance with the contracts we have with parents
- for the purposes of (e) and (h) in accordance with the legal basis of <u>vital interest</u>: to keep children safe and for the provision of emergency medical support whilst they are in our care (food allergies, medical conditions, safeguarding)
- for the purposes of (f) in accordance with the legal basis of <u>legal obligation: t</u>o meet legal obligations placed upon us during the course of our operation through the following legislation:
  - Legea educatiei nationale. Legea nr. 1/2011
- for the purposes of (g) in accordance with the legal basis of <u>consent</u>: we will collect consent to perform marketing and promotional activities at the time of collection. Such consent may be withdrawn at any time using the various mechanisms made available to do so or by contacting the data protection officer identified at the end of this privacy policy.
- for the purposes of (i) in accordance with the legal basis of <u>public task</u>: to provide the appropriate government departments with the data we are required to as a school in Romania

In addition, concerning any special category data:
- conditions a, b, c and d of EU GDPR Article 9

Collecting pupil information

We obtain pupil information via registration forms before the start of each academic year. In some cases, we may receive certain information from their former school. We are provided with the results of external examinations and tests from the relevant examining bodies including Cambridge Assessment and GL Assessment. Parents are able to use the parent portal available at www.epraise.co.uk to review and update some of the data we hold about them and their children.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with GDPR we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

Storing pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information regarding our data retention schedule and how we keep your data safe, please visit www.transylvania-college.ro/school-life/important-information-for-parents**.**

Who we share information with

We routinely share pupil information with:

- schools that the pupil attends after leaving us

- the national education ministry
- School inspectorate
- the pupil's own parents (or legal guardian)
- Cambridge Assessment
- British Council
- National Statistics Institute
- GL Assessment
- Penta International
- iStyle
- Travel and accommodation providers in the case of trips
- Event organizers for various events attended by our pupils
- Google
- Education Software Services Ltd (ESS)
- Epraise
- Social Media

Why we routinely share pupil information

Schools that the pupil attends after leaving us

To facilitate a smooth transfer and reduce any disruption to a child's learning we share certain data with your child's next school if they move to a different school. This may include personal identifiers and characteristics, additional educational needs, attendance data, academic data and safeguarding information.

Ministerul Educației Naționale (The National Education Ministry)

We are required to share pupil data with the National Education Ministry through the Siiir national database. Data is transferred through a secure online portal (https://www.siiir.edu.ro).

Inspectoratul Școlar Județean Cluj (Cluj Schools Inspectorate)

The Cluj Schools Inspectorate also has access to the pupil data that we share with the National Education Ministry through the Siiir national database. In addition to this we are required to share pupil assessment data with them. This data is not transferred to them but rather they are given access to the school's hardcopy written assessment records held in the 'Catalog' during on-site inspection visits.

Institutul Național de Statistica România (National Institute of Statistics Romania)

We are required to send annual statistical data to the National Institute of Statistics. This is in the form of anonymised statistical data. Individual pupils cannot be identified from the data transferred. The data is transferred in hard-copy format through the completion of a pro forma.

The pupil's parents or legal guardian

In order to be effective in providing our pupils with an education we communicate regularly with parents regarding the academic progress and behavior of their children. We do this through a secure online parent portal provided by Education Software Services Ltd. This is available from https://hslg10.capita-cso.co.uk/schools/TCOL/SLG/ and from https://www.sims-parent.co.uk as well as a native app available for iOS and Android through their respective app stores. We also routinely have in-person meetings and telephone and email conversations with parents regarding

the progress and behavior of their children and as required.

We are required under the GDPR to respond to data subject access requests made by parents on behalf of their minor children.

Cambridge Assessment

Cambridge Assessment is the examination board who operate the IGCSE, AS/A Level, Young Learners, KEY for Schools and PET for Schools examinations we conduct at our school. We transfer pupil data to them in order to register candidates for examinations, to allow them to assess examination scripts and to issue certificates of achievement. Registration of students and results is done through a secure online portal. Completed examination scripts and certificates of results are sent as hard copies by courier.

British Council

We offer the Cambridge Young Learners, KEY for Schools and PET for Schools examinations in partnership with the British Council. To allow the British Council to register students we share pupil data with them.

GL Assessment

GL Assessment operates the CAT4 assessments which we use as baseline data for monitoring the amount of progress that pupils make and for providing predictions of pupils' future performance. We transfer data to allow them to register pupils for assessments, assess pupil test answers and to make predictions about pupils' future performance. This is done through a secure online portal provided by them.

Penta International

Penta carries out inspections on the school's behalf as part of the accreditation process for the British Schools Overseas (BSO) and Council of British International Schools (COBIS) accreditation programs.

We share pupil data, including assessment data and pupil and parent surveys, to allow them to monitor and assess our school against the BSO and COBIS criteria for accreditation. This data is shared with them during on-site visits as a mixture of both electronic and paper records. They use this data to produce an inspection report which is then publicly published on their website (http://www.pentainternational.co.uk/bso.php) the inspection report may contain anonymised statistical data but does not contain data from which individual students could be identified.

iStyle

We have partnered with iStyle as part of our iPads for Learning project. They are our recommended supplier of iPads to parents, pupils and staff. In order to facilitate the ordering and distribution of iPads we share the names and contact details of pupils and parents who have requested that we reserve an iPad for them with iStyle. They use this information in order to be able to keep them updated about the progress of their order and to allow them to identify customers who are entitled to the discount we have negotiated with them, which is exclusive to members of our school community. The data is shared only with the store manager and is not used for marketing or promotional purposes. We only share the data of pupils and parents who

have asked us to do so in order for them to be able to reserve an iPad from iStyle.

We share this data with them as a secure, encrypted document stored online with Google Drive.

Travel and accommodation providers

When organizing trips we may need to share some information with providers of travel and accommodation services as required. Additional information about what information will be shared and who will be shared with the affected students and parents during the organization of such trips.

Event organizers

We routinely take part in a variety of events both as part of the curriculum and as extra-curricular activities. In doing so we may be required from time to time to share certain information about pupils with event organizers. When this is required we will inform the affected parents and students of what data is being shared and why prior to the event taking place.

Google

We make use of the Google Apps for Education tools provided by Google Education, including Mail, Drive, Docs and Classroom. In order to create user accounts for pupils we add them to the service using their full name. This is transferred to Google using a secure online portal. Drive and Classroom are used to store pupil work and some assessment information. Mail is used by staff to communicate with each other and with pupils and parents regarding student progress, behavior, additional needs and concerns.

Social Media

We use social media to publicize the activities of the school which includes photographs and videos which may include pupils, parents and staff. We ask for consent to do this and that consent can be revoked at any time by contacting our data protection officer, named at the end of this policy. We currently use Facebook, Instagram, Twitter, Youtube, Flickr, Pinterest and Google platforms for this.

Education Software Services Ltd (ESS)

Our Management Information System (MIS) and parent portal, collectively known as SIMS, are provided by Education Software Services Ltd (ESS). SIMS is the primary storage location for our database of pupil, parent and staff data. It is hosted securely by Education Software Services Ltd. (ESS) and accessed by us remotely. Access to certain data held within SIMS is available to parents and students through Epraise by accessing the online portal: https://www.epraise.co.uk/

Requesting access to your personal data

Under GDPR, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the data protection officer identified at the end of this privacy policy.

You also have the right to:
- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ANSPDCP, or through the courts

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Autoritatea Naţională de Supraveghere a Prelucrării Datelor cu Caracter Personal (ANSPDCP) at http://www.dataprotection.ro/?page=contact&lang=ro

Contact

If you would like to discuss anything in this privacy policy, please contact our data protection officer (DPO):

- Adriana Todea on 0722 647 208 or by email at dpo@transylvania-college.ro