



RUSSIAN SCHOOL LUCHIK
MILTON KEYNES & BEDFORD

DATA PROTECTION POLICY

Introduction to Data Protection

Russian school Luchik Milton Keynes and Bedford is required to maintain certain personal data about living individuals for the purposes of satisfying operational and legal obligations.

The Russian school recognises the importance of the correct and lawful treatment of personal data; it maintains confidence in the organisation and provides for successful operations.

The type of personal data that Russian school may require includes information about:

- Current, past and prospective employees.
- Russian school members.
- Suppliers or trainers
- Others with whom we communicate.

This personal data, whether it is held on paper, computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 1998.

The Russian school fully endorses and adheres to the eight principles of the Data Protection Act. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for the Russian school must adhere to these principles.

Principles of the Data Protection Act 1988

The principles require that personal data shall:

- Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and, where necessary, kept up to date.

- Not be kept for longer than is necessary for that purpose.
 - Be processed in accordance with the data subject's rights.
 - Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
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- Not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Satisfaction of Principles

In order to meet the requirements of the principles, The Russian School will:

- Observe fully the conditions regarding the fair collection and use of personal data.
- Meet its obligations to specify the purposes for which personal data is used.
- Collect and process appropriate personal data only to the extent that it is needed to fulfil operational or any legal requirements.
- Ensure the quality of personal data used.
- Apply strict checks to determine the length of time personal data is held.
- Ensure that the rights of individuals about whom the personal data is held, can be fully exercised under the Act.
- Take the appropriate technical and organisational security measures to safeguard personal data.
- Ensure that personal data is not transferred abroad without suitable safeguards.

Data Protection Monitor

Everyone within The Russian school has a responsibility to be aware of Data Protection issues. However, it is important to have one person on the Russian school Management Committee who has agreed to monitor Data Protection. This person is responsible for ensuring;

- That the policies are up to date.
- That staff are aware of the policy and have read and understood it.

Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with the Data Protection Monitor.

Status of the Policy

This policy has been approved by the Director/Chair and any breach will be taken seriously and may result in formal action. Any employee who considers that the policy has not been followed in respect of personal data about themselves should raise the matter with the Data Protection Monitor in the first instance.

Subject Access to Information

All individuals who are the subject of personal data held by the Russian school are entitled to:

- Ask what information the Russian school holds about them and why.
- Ask how to gain access to it.
- Be informed on how to keep it up to date.
- Be informed of what the Russian school is doing to comply with its obligations under the 1998 Data Protection Act.

Information you don't have to provide under subject access requests
Individuals who are the subject of personal data held by the Russian school are not entitled to:

- Information held for management planning, e.g. plans to promote an employee or make an employee redundant.
- Information as to the Russian school intentions in respect of negotiations with the requester
- References the Russian school has given about the worker in confidence
- Information about the prevention or detection of a crime, or the arrest or prosecution of offenders
- Information that may affect the price of a company's shares
- Information that may identify someone else including the identity of a confidential complainant against the subject

Keeping other workers' information confidential

When providing data the Russian school will make sure we don't violate anyone else's data protection rights. For example, if you receive a complaint about an employee, and that employee then requests access to their file, this could lead to the complainant being identified.

To avoid this we will obscure the name of the complainant in the original document before copying it and giving the copy to the worker. In some cases

the contents of a document may still identify the writer so it may be necessary to obscure other parts of the document or withhold it altogether.

Workers' other rights in relation to their records

Individuals who are the subject of personal data held by the Russian school are entitled to:

- Have inaccurate personal data corrected
- Compensation for damage suffered as a result of the Russian school breach of the Act
- Prevent processing likely to cause substantial damage or substantial distress

Employees are entitled to know the logic behind any automated decisions taken about them. Some fully automated decisions are exempt from these provisions. These are where the decision is taken:

- In relation to entering or carrying out a contract
- Is authorised or required by an Act of Parliament
- The decision results in the granting of a request the employee has made

If an employee has reasonable grounds to believe the Russian school has not paid them the national minimum wage, they have the right to see their pay records. They must make a written request, on receipt the Russian school will produce the records within 14 days.

Employee Responsibilities

All employees are responsible for:

- Checking that any personal data that they provide to the Russian school is accurate and up to date.
- Informing the Russian school of any changes to information which they have provided, e.g. changes of address.

- Checking any information that the Russian school may send out from time to time, giving details of information that is being kept and processed.

If, as part of their responsibilities, employees collect information about other people they must comply with the Policy and with the Data Protection Procedures which are contained in the Data Protection Act 1998.

Data Security

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted.

All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely.
- Personal information is not disclosed either orally or in writing or otherwise to any unauthorised third party.

Rights to Access Information

Employees and other subjects of personal data held by the Russian school have the right to access any personal data that is being kept about them on computer and also have access to paper-based data held in certain manual filing systems. This right is subject to certain exemptions which are set out in the Data Protection Act 1998. Any person who wishes to exercise this right should make the request in writing to the Russian school Data Protection Monitor.

The Russian school reserves the right to charge the maximum fee payable for each subject access request. This fee is reached by calculating the cost of assembling the information to the organisation. The Russian school reserves the right to ask for evidence in order to prove the requesters identity and for information may need to find the requested data. If personal details are inaccurate, they can be amended upon request.

The Russian school aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt of a completed written request unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

Publication of the Russian school Information

Information that is already in the public domain is exempt from the 1998 Act. This would include, for example, information on staff contained within externally circulated publications such as the Russian school newsletter or directors report. Any individual who has good reason for wishing details in such publications to remain confidential should contact the Data Protection Monitor.

Subject Consent

The need to process data for normal purposes MUST be communicated to all data subjects. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data must be obtained. Processing may be necessary to operate the Russian school policies, such as health and safety and equal opportunities.

Retention of Data

The Russian school will keep some forms of information for longer than others. All staff are responsible for ensuring that information is not kept for longer than necessary.

Supporting Material

It is advisable to keep a copy of the Data Protection Act 1998 to support this policy. These documents can be obtained from the Data Protection Monitor. A general description of the categories of people and organisations to which we may disclose information, are also listed in the Data Protection Register. This information may be inspected or obtained from the Data Protection Monitor.