

Privacy Notice for parents and guardians – use of parent & child’s personal data

International School Brunei

1. Introduction

Under data protection law, individuals have a right to be informed about how the International School Brunei collects, stores and uses any personal data that we hold about them. We comply with this right by providing ‘privacy notices’ to you, parents and students, where we are processing their personal data.

Our data protection officer is Carol Hancox (see ‘Contact us’ below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about your child includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Exclusion information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs and videos

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- CCTV images captured in school
- Characteristics, such as ethnic background or special educational needs

We may also hold data about your child that we have received from other organisations, including other schools.

3. Why we use this data

We use the data listed above to:

- a) Support pupil learning
- b) Monitor and report on pupil progress
- c) Provide appropriate pastoral care
- d) Protect pupil welfare
- e) Assess the quality of our services
- f) Administer admissions waiting lists
- g) Comply with the law regarding data sharing
- h) Use your child's photos and videos for marketing purposes.

4. Our lawful basis for using this data

Our lawful bases for processing your child's personal data for the purposes listed in section 3 above are as follows:

- For the purposes of [g], in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law as set out here:
 - The school is required to share with the Brunei Ministry of Education, annual statistics including the number of males, female, nationality, date of birth, vaccination status, parent contact details and allergies & medical information
 - For the purposes of [a-f], in accordance with the 'contract' basis – we need to process personal data to fulfil a contract with your child in order to provide them with an education.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing:

- We have obtained your explicit consent to use your child's personal data in a certain way
- We need to protect an individual's health and welfare

5. Collecting this data

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from parents/guardians, but we may also hold data about your child from:

- Local authorities e.g. Ministry of Education,
- Immigration for students being sponsored by ISB e.g. Overseas residence students
- Other Schools through transfer data requests

6. How we store this data

We keep personal information about your child while on roll at ISB. We may also keep it beyond their attendance at our school if this is necessary. Our Data Protection Policy sets out how long we keep information about pupils. All personal information collected at the time of admissions is kept on the Schools Information Management System (SIMS) with restricted access to staff according to role as well as a paper file, which is kept secure by the admissions officer. Subsequent data collected during school operations will be updated accordingly.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

7. Who we share data with

We do not share information about your child with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary, we may share personal information about your child with:

- Government departments or agencies
- Accrediting Bodies e.g. IB CAIE
- Health authorities
- Police forces, courts, tribunals

7.1 Transferring data internationally

We may share personal information about your child with the following international third parties, where different data protection legislation applies:

- Examination Boards e.g. CIE, AQA, IB
- Universities and overseas schools for admissions purposes
- App or Cloud Service Providers e.g. Microsoft, SeeSaw, Managebac.

8. Your Roles & Responsibilities (Parents/Students)

8.1 Your Responsibility

All parents and students are responsible for:

- Reading the Privacy Notice which outlines their role and responsibility as well as the schools
- Providing personal data about themselves/their children at the time of admission
- At the time of admissions, giving consent for the school to use personal data in accordance to the Privacy Notice
- Updating the school when personal data changes e.g. change of address
- Responding to additional personal data requests

8.2 You may request to access personal information that we hold about your child

You have a right to make a 'subject access request' to gain access to personal information that the school holds about you (parent & children). Subject access requests must be submitted in writing, by email. They should include:

- Name of individual
- Specific details of the information requested

When responding to the specific data requests, ISB:

- Will verify the authenticity of the request
- Will respond within one month of receipt of the request

ISB will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests

If the request is unfounded or excessive (e.g., repeated requests for the same information), ISB may refuse to act on it, or charge a reasonable fee which considers administrative costs.

If you would like to make a request, please contact us (see 'Contact us' below).

8.3 You have the right to make a complaint

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

9. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

➤ Carol Hancox Chancox@ac.isb.edu.bn