



SHREWSBURY INTERNATIONAL SCHOOL

HONG KONG

Policy Title: Data Protection Policy

Policy Section: Section F: Staffing

Publish to: Policy Compendium

Staff Portal

Parent Portal

Introduction

Shrewsbury International School Hong Kong is fully committed to implementing and complying with the data protection principles and all relevant provisions under the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region.

The Data Protection Policy has been designed to support the interests of all community members, particularly when pertaining to the correct handling, use, storage, retention and disposal of sensitive information.

Key terms

Personal Information Collection Statement (PICS):

A commitment to the purpose for which Personal Data will be used in relation to a given interaction. A PICS should always include details relating to whether or not collection is voluntary, alongside the consequences for failing to supply the information requested, the way in which information may be transferred or disclosed, to include rights of access and the contact details of our Data Protection Officer charged with the management of any correction requests.

Personal Data:

Information which can be used to identify an individual.

Data Subject:

The individual about whom the Personal Data relates.

Data User:

The person or group of people who controls the collection, holding, processing or use of Personal Data.

Data Processor:

The person or group of people who processes Personal Data on behalf of a Data User - Data processors are not directly regulated under the Personal Data (Privacy) Ordinance, but they are required to meet all applicable requirements.

Personal Data: Collection and use

The School collects Personal Data directly and indirectly, through submissions made via the school website, for example. In all cases, it will only do so if it believes it either is or may be required to sustain usual and common operational practices associated with the management of an International School. The information collected is processed securely, used exclusively for the purpose defined at the point of collection and stored only for as long as is required to fulfil this original purpose.

The School regularly uses Personal Data for the delivery of information to both enrolled and prospective families - in this case, Data Subjects will be invited to opt-in should materials contain a direct marketing component.

There may be occasions upon which the refusal to provide Personal Data limits the ability of The School to successfully and meaningfully interact, such as when considering an application for admission or vacant role.

Personal Data: Accuracy, Storage, Retention and Disposal

The School takes the appropriate storage of data seriously Personal Data is stored securely with access limited to authorised members of school staff for a specifically designated role-defined purpose only. Changes to authorisation levels must be explicitly agreed by the Principal.

The School takes all practical steps to ensure that Personal Data stored is up-to-date and reviews data held on an annual cycle, disposing of it periodically when it is no longer required, unless erasure is prohibited by law.

The process of disposal is managed considerately and cautiously - it is overseen directly by the Director of Business Services.

Personal Data: Access Requests

The School commits to supporting legitimate confidential requests from verified professional organisations, including police, health and immigration departments, as well as prospective future employers and schools who make a reference request prior to the admission of a student. Personal Data will not be disclosed to any external organisation without the prior consent of the Data Subject unless disclosure is either required by law or the withholding of information may place a child at risk.

Personal Data: Right of Access and Correction

Individuals have the right to access information that The School holds about them and their children, although The School is not obliged to disclose records that may place a child at risk. Requests should be emailed to the School's Data Protection Officer via pdpo@shrewsbury.edu.hk - they will require authenticated verification and may require the application of a service fee.

Individuals have the right to make corrections to Personal Data previously provided and The School has assigned a Data Protection Officer charged with the management of these requests.

Related Policies

This Policy should be read alongside:

- B2: Terms and Conditions
- D1: Admissions
- E1: Child Protection and Safeguarding
- F2: Recruitment
- F12: Code of Conduct

<https://www.shrewsbury.edu.hk/privacy-policy> (to be updated on website)

Appendix A: PICS Framework

Shrewsbury International School Hong Kong (herein referred to as the School) is fully committed to implementing and complying with the data protection principles and all relevant provisions under the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region.

This Personal Information Collection Statement (PICS) relates to the way in which Personal Data is collected and handled by The School and acts in direct support of its Data Protection (F8) policy.

1. There are occasions upon which it is necessary for The School to collect Personal Data.
2. Personal Data is collected for specifically designated role-defined purposes only and stored securely with access limited to authorised members of school staff - information is only held for as long as required.
3. Personal Data may be stored within school management systems and held as part of an official record.
4. The disposal of Personal Data is managed considerably and cautiously - it is overseen directly by the Director of Business Services.
5. The School may use Personal Data to send relevant communications to parents, students, staff and visitors to ensure that they are kept well informed. Data Subjects will be required to opt-in to receiving materials which may have a direct marketing component.
6. The School reserves the right to sensitively disclose Personal Data to third parties on occasion, to include the Government of the Hong Kong Special Administrative Region (most commonly through requests made by the Education Bureau), the Shrewsbury Parents Association, service providers and contractors in order to support usual operational function.
7. The School reserves the right to sensitively disclose the Personal Data of employees to relevant stakeholders at the discretion of The Principal.

8. The School reserves the right to use the name and image of students, parents, members of staff and visitors in promotional and organisational publications in accordance with a prescribed set of Terms and Conditions.
9. The School will not disclose Personal Data to external bodies or organisations unless:
 - a. It is provided for under this Statement;
 - b. It is permitted by the Data Subject;
 - c. It is permitted or required by law; and/or
 - d. Withholding it may place a child at risk.
10. Failure to provide Personal Data may result in The School being unable to proceed with the purpose for which such data was requested.

Data Subjects may submit a signed, written request to the School's Data Protection Officer (pdpo@shrewsbury.edu.hk) to access or correct Personal Data held by The School - fees for accessing the information will be confirmed at time of application.