SHREWSBURY INTERNATIONAL SCHOOL HONG KONG

Policy Title:	Data Protection
Policy Section:	Section F: Staffing
Publish to:	Policy Compendium Staff Portal Parent Portal Website

Introduction

Shrewsbury International School Hong Kong highlights Care and Compassion as a core value within Guiding Statements that also describe a commitment to 'continuous evaluation, improvement and growth'.

This 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. It acts to demonstrate a commitment to the implementation of and compliance with all relevant provisions under the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region.

Key terms

A 'Personal Information Collection Statement (PICS)' is a written description of the purpose for which Personal Data will be used in relation to a given interaction.

'Personal Data' is information which can be used to identify an individual.

The 'Data Subject' is the individual about whom the Personal Data relates.

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The ‘Data User’ is the person or group of people who controls the collection, holding or use of Personal Data.

The ‘Data Processor’ is 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. In all cases, it will only do so if it believes it 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 in accordance with our PICS (Appendix A).

The School 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 any 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 by the Director of Business Services.

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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 for information require the submission of authenticated verification of identity and may incur an application fee. They should be emailed to our Data Protection Officer (pdpo@shrewsbury.edu.hk).

Individuals can also contact the Data Protection Officer if they wish to correct any Personal Data previously submitted.

Related Policies

This Policy should be read alongside:

- B2: Terms and Condition
- C7: Digital Citizenship
- D1: Admissions
- E1: Child Protection and Safeguarding
- F2: Recruitment
- F12: Code of Conduct

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Appendix A: Personal Information Collection Statement

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.

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. 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.

2. Personal Data may be stored within school management systems and held as part of an official record.

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

4. 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.

5. 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 common operational function.

6. The School reserves the right to sensitively disclose the Personal Data of employees to relevant stakeholders at the discretion of The Principal.

7. 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.

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8. The School will not disclose Personal Data to external bodies or organisations unless:
    8.1. It is provided for under this Statement;
    8.2. It is permitted by the Data Subject;
    8.3. It is permitted or required by law; and/or
    8.4. Withholding it may place a child at risk.

9. 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 alongside an authenticated verification of their identity - fees for accessing the information will be confirmed at time of application.

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