



STATEMENT OF ACCOUNTABILITY IN RESPECT OF DATA PROTECTION AT STRATHALLAN

Your privacy is important to Strathallan School and we appreciate that we are entrusted with the personal information, including sensitive personal information, of our staff, pupils, parents/guardians, guests, and visitors. For the purposes of this accountability statement, personal information means any information that enables us to identify a specific living individual.

We are obligated by legislation and ethical practices to maintain your personal information in strict confidence and to ensure that your personal information is protected by physical, administrative, and technical safeguards. These obligations apply to personal information in all formats, including oral, written, and electronic formats; moreover, these safeguards must protect all manners of handling personal information, including collection, use, disclosure, access, storage, transfer, copying, modification, and disposal.

Strathallan School together its staff, contractors, volunteers, partners, and agents are responsible for ensuring the confidentiality and protection of your personal information in the custody or control of the School. As part of our obligations and commitment to you, we are required to abide by a number of principles that determine how we may collect, process, and treat your personal information:

- We will only process your personal information lawfully, fairly, and in a transparent manner.
- When we collect your personal information, we will only use it for a specified and legitimate purpose and not use your personal information in any other manner unless you give us your express consent.
- We will only ask for the personal information that we need for a specified and legitimate purpose and will not ask for excessive or irrelevant information.
- We will ensure that the personal information we hold about you is accurate and, where necessary, kept up to date and will take every reasonable step to ensure that personal information which is out of date will be erased or corrected.
- We will only hold your personal information for no longer than is necessary for the purposes that we have explained to you as part of our privacy policies and in accordance with our data retention policies. When we store your personal information it will be held in accordance with appropriate technical and organisational measures to safeguard your rights and freedoms.
- We will only process your personal information in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

We understand that these principles are not just guidelines and that, as part of our obligation to keep your personal information safe and secure, we must be able to demonstrate our compliance with these principles. Therefore, as part of our overall accountability to you we have introduced a governance structure aimed at ensuring that there are individuals within our school who are responsible for data privacy, including an accountable management team and management reporting procedures.

We maintain an inventory of where key personal information is stored, including the flow of key personal data through our school including, where necessary, documenting and disclosing transfers of personal information outside of our school and cross-border. This helps us manage our third-party risk and helps us to track the processing of personal information that we may pass to external parties within the United Kingdom, the European Economic Area, and further abroad. As part of this commitment we have undertaken a review of our existing supplier agreements and endeavoured to put in place arrangements to protect your personal information when it is transferred to a supplier. This may, for example, include revising our existing contracts or putting in place data sharing agreements.

We also maintain internal data protection policies that our staff, employees, contractors, volunteers, and partners are required to comply with in addition to our school code of conduct. At the centre of our internal data protection initiatives is the idea that the protection of personal information should be embedded within the fabric and culture of the school and, to this end, we have incorporated or revised a number of our policies including our Remote Working and Own Device policy, Data Handling policy, Document and Records Retention policy, Alumni and Development Team Communication and Marketing policies, IT Acceptable Use policies; Taking, Storing and Using Images of Children policy, Website Privacy Notice, Website Cookies policy, Social Media Policy, CCTV policy, and Privacy Notices for parents and for pupils. We maintain a training and awareness program for data protection and all of our full-time and part-time staff as well as our Governors are required to complete mandatory training on how to handle personal information – this forms part of our induction process and we review and update our staff, contractors, volunteers, partners, and agents on changes to data protection legislation as new guidance is released by the Information Commissioner’s Office.

We regularly audit our information management systems, both physical and electronic, in order to assist the school in understanding and managing its information security risk. We apply a “Privacy by Design” approach to how we manage the risks around handling personal information and, to that end, we now use a number of tools to help us measure and monitor personal information risk, for example, completing data protection impact assessments and reviewing third-party contracts through a data protection contract risk matrix and checklist. We regularly review our access control policies to ensure that we minimise the amount of personal information that is accessed by our staff, contractors, volunteers, partners, and agents and, where necessary, encrypt personal information and/or segregate particularly sensitive personal information.

We continue to monitor and update our data protection policies in line with changes to legislation.

If you have any questions about how we collect, process, and manage your personal information then please do not hesitate to get in touch us at: dataprotection@strathallan.co.uk

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Lauder', with a horizontal line underneath.

David Mark Lauder

For and on behalf of Strathallan School