

2026/2027

Data Protection & Privacy Policy

WHOLE SCHOOL



SINCE 1973

Updated by:

Executive Director

Introduction

Morna International College is committed to protecting the privacy and personal data of all members of its school community. We recognise the importance of handling personal information responsibly and in accordance with applicable data protection legislation.

This policy provides an overview of how Morna International College collects, processes, stores, shares and protects personal data in accordance with:

- Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)
- Spanish Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD)
- The guidelines, guidance and interpretative criteria published by the Spanish Data Protection Authority (Agencia Española de Protección de Datos – AEPD), where applicable.

1. Policy Statement

Morna International College is committed to protecting the personal data of students, parents, staff, contractors and visitors.

The School processes personal data lawfully, fairly and transparently and applies appropriate technical and organisational measures to safeguard personal information and ensure compliance with applicable data protection legislation.

2. Scope

This policy applies to all personal data processed by the School in paper and electronic form, including information processed through school information systems, educational platforms, finance systems, communication platforms and the School website.

3. Legal Framework

The School processes personal data in accordance with:

- Regulation (EU) 2016/679 (GDPR)
- Spanish Organic Law 3/2018 (LOPDGDD)
- Other applicable Spanish legislation and guidance issued by the AEPD.

4. Data Protection Principles

The School is committed to ensuring that personal data is:

- Processed lawfully, fairly and transparently.
- Collected only for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
- Protected through appropriate technical and organisational security measures.
- Processed in a manner that demonstrates accountability and compliance.

5. Admissions, Privacy Information and Consent

At the beginning of the admissions process, parents, legal guardians and, where applicable, students are provided with the privacy information, declarations and consent requests required under Spanish and European data protection legislation.

The School requests only those acknowledgements, authorisations and consents required by law.

Where consent is required, it is requested separately for each individual purpose and is never bundled with acceptance of the School's Terms and Conditions where another lawful basis applies.

6. Students Aged 14 and Over

In accordance with Article 7 of Spanish Organic Law 3/2018, students aged 14 or over may provide their own consent where consent is the lawful basis for processing.

For students under the age of 14, consent will normally be provided by a parent or legal guardian.

This does not affect the School's ability to process personal information where another lawful basis applies, including the performance of the educational contract, legal obligations, safeguarding responsibilities or legitimate interests.

7. Categories of Personal Data

The School may process:

- Identification details
- Contact information
- Academic records
- Attendance records
- Behaviour and pastoral information
- SEN records
- Medical information
- Financial and billing information
- Emergency contacts
- Photographs and video recordings
- CCTV images where appropriate

8. Lawful Bases for Processing

Personal data may be processed on one or more of the following lawful bases:

- Performance of the educational contract.
- Compliance with legal obligations.
- Protection of vital interests.
- Legitimate interests of the School.
- Consent, where consent is required by law.

9. School Information Systems

Morna International College uses secure digital systems to support the administration, education and day-to-day operation of the School.

iSAMS

The School's primary Management Information System (MIS) is **iSAMS**, which is used to securely manage student, parent and administrative information, including:

- Admissions and enrolment
- Student and parent records
- Attendance
- Academic records
- Behaviour and pastoral information
- Learning Support (SEN)
- Medical information
- School communications
- Student billing

Access to iSAMS is restricted to authorised members of staff according to their role and responsibilities. Appropriate technical and organisational measures are in place to protect personal data from unauthorised access, alteration, disclosure or loss.

The School uses **Sage 200** as its finance and accounting system.

Where necessary, relevant billing information is securely transferred between iSAMS and Sage 200 to enable the School to administer school fees, maintain accurate financial records and comply with its legal and accounting obligations.

Access to Sage 200 is limited to authorised members of staff.

Classlist

The School uses **Classlist** as its principal platform for parent communication.

Classlist enables parents and legal guardians to receive important school communications and engage with the wider school community. Participation in Classlist is optional.

The School only shares the minimum personal information necessary for the operation of the platform.

Parents using Classlist are expected to comply with the Morna Community Code and to respect the privacy and confidentiality of other members of the school community.

Other Third-Party Providers

The School also works with carefully selected third-party service providers that support the delivery of education and the operation of the School.

Where personal data is processed by a third party on behalf of the School, Morna International College takes reasonable steps to ensure that appropriate contractual, technical and organisational safeguards are in place in accordance with applicable data protection legislation.

10. Photography and Video

Separate consent is obtained, where required, before identifiable photographs or videos of students are used in external publications or promotional materials.

As part of its communication with the school community, Morna International College maintains an official website and social media channels, including Instagram, which are used to share school news, celebrate student achievements and promote the school. The School is committed to respecting the privacy wishes of parents and guardians at all times. Images or videos of students whose parents have not provided the appropriate consent will not be used on these external platforms. Staff responsible for managing the school's website, social media accounts and marketing materials are fully aware of these requirements and ensure that parental consent preferences are strictly observed.

Photographs or recordings used internally for educational, safeguarding or administrative purposes may be processed under other lawful bases, where appropriate, in accordance with the school's Data Protection Policy.

11. CCTV Systems

Morna International College operates a CCTV system across the majority of the external areas of the school campus, together with selected internal locations where appropriate, for the purposes of safeguarding students, staff and visitors, protecting school property, assisting with the investigation of incidents, and supporting the prevention and detection of crime.

CCTV cameras are **never** installed in toilets, bathroom facilities, changing areas or any other location where individuals would reasonably expect a high level of privacy.

The School processes CCTV footage on the lawful bases of its legitimate interests, compliance with legal obligations where applicable, and the protection of the vital interests of individuals where necessary.

Access to CCTV recordings is strictly controlled and limited to authorised personnel. Routine viewing access is restricted to the Executive Director, in their capacity as the School's Legal Representative, and the member of staff responsible for data protection administration. Members of the School's IT Services Department may

have technical or administrative access to the CCTV system solely for the purposes of system maintenance, configuration, security or fault resolution. They are not authorised to access or review CCTV recordings except where this is strictly necessary for those technical purposes and in accordance with the School's data protection procedures.

Where an incident requires investigation, relevant footage may be viewed by members of the Senior Leadership Team or other authorised staff strictly on a need-to-know basis and only for the specific incident under investigation. CCTV recordings will not be shown to parents, students, members of staff or other third parties unless required or permitted by law, or where disclosure is authorised by the Executive Director in accordance with applicable legislation.

CCTV recordings are retained only for the period necessary to fulfil the purposes for which they were collected. Under normal circumstances, the School's CCTV system automatically overwrites recordings after approximately 11 days. In any event, recordings are not routinely retained for longer than one month unless they are required as part of an ongoing safeguarding matter, disciplinary investigation, insurance claim, police investigation or other legal proceedings.

The operation of the CCTV system is managed in accordance with applicable data protection legislation and guidance issued by the “Agencia Española de Protección de Datos” (AEPD). Appropriate technical and organisational measures are in place to ensure the security and confidentiality of all recordings.

12. Security

Morna International College implements appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, loss or misuse.

These measures include role-based access controls, secure information systems, password protection, staff training and procedures designed to ensure that personal information is handled securely and only by authorised members of staff.

The School regularly reviews its security arrangements to ensure they remain appropriate and effective.

13. Individual Rights

Individuals have the right, where applicable, to:

- Access their personal data.
- Request correction of inaccurate information.
- Request erasure of personal data.
- Request restriction of processing.
- Request data portability.
- Object to processing.
- Withdraw consent where consent is the lawful basis.

14. Complaints

Morna International College encourages any individual who has concerns about the processing of their personal data to raise the matter with the School in the first instance. Concerns should initially be directed to the Finance & Business Support Officer, who is responsible for the day-to-day administration of data protection matters. Where appropriate, concerns may also be discussed with the Head Teacher in relation to operational or educational matters, or referred to the Executive Director, who is the Policy Owner and the School's Legal Representative.

If the individual remains dissatisfied or believes that their personal data has not been processed in accordance with applicable data protection legislation, they have the right to lodge a complaint with the

Agencia Española de Protección de Datos (AEPD).

Website: www.aepd.es

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Policy Owner	Executive Director
Responsible Officer	Finance & Business Support Officer
Applies To	Whole School
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