International School Rheintal

Data Protection Policy

September 2025

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ISR Guiding Statements

International School Rheintal Vision

ISR is the school of choice in the Alpen Rheintal region providing a high quality international education in English for students from Kindergarten to Grade 12, inspiring international-mindedness, academic, personal excellence and responsible engagement.

Reviewed June 2023

International School Rheintal Mission

ISR is a supportive, challenging and student-centered environment. We encourage each student to reach their potential whilst promoting international-mindedness, empathy and life-long learning. Through teamwork and individual endeavours, members of the school community should:

- Respect and take responsibility for themselves, others and the environment
- Appreciate and respect diversity
- Think critically
- Reflect thoughtfully
- Communicate effectively
- Celebrate success

Reviewed June 2023

1. Introduction

The International School Rheintal is committed to protecting the personal data of all members of its community, including parents, students, staff, volunteers, and visitors. This Data Protection Policy outlines the principles, procedures, and guidelines for collecting, storing, processing, using, and protecting personal data within the school. We aim to ensure compliance with the Swiss Federal Act on Data Protection (nFADP), which came into effect on September 1, 2023, and to maintain the trust and confidence of our community.

2. Scope

This policy applies to all parents, all students enrolled at the International School Rheintal (regardless of age or grade level) and prospective students, all staff members (regardless of employment status or position), alumni, board members, volunteers, visitors, and third parties who interact with the school-managed data. It covers personal data collected in any form, including electronic, paper, or visual/audio recordings.

3. Legal Framework

ISR complies with:

- Swiss Federal Act on Data Protection (FADP, revised 2023)
- Ordinance to the FADP (OFADP)
- Cantonal education and privacy regulations (St. Gallen)
- EU General Data Protection Regulation (GDPR)
- International Baccalaureate Organisation (IBO) and Council of International Schools (CIS) accreditation standards

4. Definitions

A. Data controller: The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by law, the controller may be designated by national or Union law or by

the Member State responsible for adopting the measure. In this case, the Data Controller is the International School Rheintal.

B. Data processor: A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

C. Data Protection Officer (DPO): ISR has designated a Data Protection Officer responsible for monitoring compliance, advising on obligations, and acting as the contact point for the FDPIC and the ISR community. The DPO role is currently held by the IT Support Assistant and may be reassigned as needed. Contact: dataprotection@isr.ch.

D. Data subject: The identified or identifiable individual whose personal data is being processed (i.e., parent, student, staff member or volunteer).

E. ISR Community: This includes parents, all students enrolled at the International School Rheintal (regardless of age or grade level) and prospective students, all staff members (regardless of employment status or position), volunteers and visitors.

F. Personal data: Any information relating to an identified or identifiable living individual.

G. Processing: Any operation or set of operations performed on personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing or destroying.

H. Special categories of personal data: Sensitive personal data that requires stricter protection, such as information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetics, health, gender, or sexual orientation.

5. Collection of Personal Data

International School Rheintal collects personal data from its community members (active and prospective) for various purposes.

5.1 Categories of Personal Information We Collect

Category	Examples of Information Collected	Purpose of Collection
Student Identity Information	Name, date of birth, gender, photograph, student ID	Identification, enrollment, and attendance tracking
Contact Information	Home address, phone number, email, and emergency contact details	Communication with parents/guardians and emergency purposes
Academic Records	Grades, report cards, standardised test scores, class assignments	Academic assessment, progress tracking, and reporting
Attendance and Behavioural Records	Attendance logs, lateness records, disciplinary reports	Attendance monitoring, behaviour management, and safeguarding
Health and Medical Information	Allergies, medications, immunization records, and doctor contacts	Health care management, emergency response, and compliance with regulations
Parental / Guardian Information	Names, contact details, relationship to student	Communication, legal guardianship verification
Staff Information	Name, contact info, employment history, qualifications, payroll details	Employment management, HR compliance, payroll administration
Financial Information	Tuition payments, banking details, and billing information	Fee collection, financial reporting, grants/scholarships

Category	Examples of Information Collected	Purpose of Collection
Special Needs / Learning Support	IEPs, learning accommodations, disability records	Individualised education planning, academic support
Internet or other similar network activity	Login credentials, browsing history, search history, online behaviour, and other websites, applications, systems, and advertisements	Educational technology monitoring, safeguarding, cybersecurity, and ensuring proper use of school resources
Geolocation data	Device location for school-owned or issued devices (laptops, iPads, mobile phones)	Easily locate a missing device
Multimedia	Photos, videos, and audio recordings	School events, promotional materials, internal documentation
Security Data	CCTV footage, access logs	Safeguarding, Student and staff safety, campus security and examination board requirements

The International School Rheintal only collects personal data that is necessary for the specified purposes and will not collect or process personal data excessively or disproportionately.

6. Storage and Security of Personal Data

The personal data of ISR's community is stored securely and confidentially. The International School Rheintal has implemented appropriate technical and organisational measures to protect personal data from unauthorised access, alteration, disclosure, or destruction. These measures include:

- Access controls: Limiting access to personal data to authorised personnel only.

- Data encryption: Encrypting personal data when it is transmitted or stored electronically.
- Network and Systems Security: The school network is protected by firewalls, regular security updates and internet use is filtered and monitored for safeguarding purposes.
- Physical Security: Offices storing sensitive data are restricted to authorised staff and CCTV and visitors logs are used to monitor access where appropriate,
- Data protection training: Providing all staff with mandatory training on data protection and security through the staff induction programme for new staff and also bi-annual refreshers for all staff.

7. Data Breach Notification

- In the event of a data security breach that is likely to pose a high risk to the rights and freedoms of individuals, the International School Rheintal will promptly notify the Swiss Federal Data Protection and Information Commissioner (FDPIC).
- This notification will be made as soon as feasible (usually within 72 hours) and will include details on what happened, when it occurred, the number of people affected, and the steps taken to address the breach.
- Affected individuals will also be notified without undue delay if the breach could result in a high risk to their privacy and rights.

7.1 Privacy by Design and by Default

The International School Rheintal is committed to the principles of "Privacy by Design" and "Privacy by Default".

- Privacy by Design: Data protection measures are integrated into the development and design of all new IT systems, services, and processes from the very beginning.
- Privacy by Default: All of our systems and services are configured to the most privacy-friendly settings by default. This ensures that personal data is processed with the highest privacy protection and that only the data necessary for a specific purpose is processed.

7.2 Record of Processing Activities

- In accordance with the nFADP, the International School Rheintal maintains a record of its data processing activities.
- This register includes details such as the purpose of processing, categories of data subjects, recipients, retention periods, and a general description of our security measures.

7.3 International Data Transfers

The International School Rheintal uses service providers (e.g., Google Workspace, ManageBac, Securly) that may process personal data outside Switzerland and the European Economic Area (EEA).

- ISR ensures that such transfers comply with Swiss nFADP and GDPR standards.
- Where no adequacy decision applies, ISR relies on Standard Contractual Clauses (SCCs) or equivalent safeguards approved by the FDPIC/European Commission.
- ISR ensures providers meet appropriate technical and organisational security measures before data is transferred.

8. Access to Data and Disclosure

The International School Rheintal manages access to personal data and under what circumstances personal data may be disclosed. It ensures that data is used responsibly, securely, and in compliance with applicable laws.

8.1 Access to Data

8.1.1 Staff Access

- Access is provided strictly on a need-to-know basis.
- Teachers may access academic, attendance, and behavioural information about students they directly teach.
- Support staff may access contact, enrollment, and financial information necessary for their duties.

- School health staff may access medical records solely for student welfare and emergency purposes.
- Access permissions are role-based and reviewed regularly.

8.1.2 Student Access

- Students may request access to their own academic and personal records.
- Requests should be submitted in writing and handled in accordance with parental/guardian rights for minors.

8.1.3 Parent/Guardian Access

- Parents/guardians have the right to access their child's educational and health records unless restricted by law or safeguarding concerns.
- Written requests must be submitted to the school office or directly to the Data Protection Officer (DPO).

8.2. Disclosure of Data

8.2.1 Permitted Disclosures

Personal data may only be disclosed under the following conditions:

- **Consent:**.With written consent from the parent/guardian or, where applicable, the student. For digital services, ISR applies an age threshold of 16 years for student consent, unless lower ages are permitted by specific national regulations. For younger students, parental consent is always required.
- **Legal Requirement:** When disclosure is required by law, court order, or regulatory authority.
- **Safeguarding / Vital Interests:** Where necessary to protect the safety, health, or vital interests of a student or staff member.
- **Educational Purposes:** To authorised bodies under strict data protection safeguards.
- **School Operations:** To trusted service providers (e.g., IT support, transport, catering) under written agreements requiring confidentiality.

8.2.2 Authorised Third Parties

The school may share student safeguarding records and relevant data with a student's new school, in accordance with applicable legal frameworks and professional guidelines, to ensure the continuity of child protection. This transfer is conducted in a secure and confidential manner to protect the student's privacy while upholding the duty of care.

Personal data may be shared with the following external parties when necessary and legally justified:

- **Examination Authorities**: This may be for registration purposes, to allow the students at our school to sit examinations set by external exam bodies.
- **Health Authorities**: For medical treatment, health reporting, or safeguarding needs.
- **Police and Courts**: When required for investigations, legal compliance, or court proceedings.
- **Social Workers and Support Agencies**: For safeguarding, child protection, and welfare services.
- **Educational Divisions**: For statutory reporting, funding, inspections, and compliance with educational regulations.

8.2.3 Prohibited Disclosures

- Personal data must **not** be shared with unauthorized individuals, organizations, or media without prior consent.
- Data must never be disclosed informally, such as through social media, casual conversations, or unsecured email.

9. Retention of Personal Data

The International School Rheintal will retain the personal data of its community for the minimum period necessary for the specified purposes. After this period, the data will be securely destroyed.

Data Retention Schedule (Quick Reference)

Data Category	System / Location	Retention Period	Destruction Method
Admissions (unsuccessful)	SchoolBase	Suspended/archived after withdrawal, deleted after a year	Deletion
Student academic records	ManageBac / SchoolBase	Permanent	Archived
Safeguarding / child protection	Safeguard my school/ Securly Aware logs	Up to age 25	Secure wipe/Deletion
Tuition/financial records	Abacus	10 years (Swiss law)	Secure wipe/shredding
Employee files	Abacus / HR systems	10 years after leaving	Secure wipe/shredding
Payroll/tax records	Abacus	10 years (Swiss law)	Secure wipe/shredding
Alumni contact data	Google	Permanent (unless consent withdrawn)	Deleted on request
Board/governance documents	Secure drive / SchoolBase	Permanent	N/A
CCTV footage	Unifi Controller	14 days	Automatic overwrite
Emails	Google Workspace	Suspended/archived after withdrawal, deleted after a year	Secure deletion
Learning materials/files	Google Drive / ManageBac / apps	Suspended/archived after withdrawal, deleted after a year	Secure deletion

Data Category	System / Location	Retention Period	Destruction Method
Marketing/ photography	SchoolBase / School website /Social media / Marketing publications	5 years (unless archived/ historical records or with consent for longer)	Secure deletion

10. Rights of Data Subjects

As a member of the ISR community, you have important rights when it comes to your personal data. These rights are designed to give you control and ensure that ISR handles your information responsibly and fairly.

10.1 Your Rights

- Access – You can ask what personal information ISR holds about you or your child.
- Correction – If any of your details are wrong or out of date, you can ask us to fix them.
- Deletion ("Right to be Forgotten") – In some cases, you can ask us to delete your data (for example, if we no longer need it).
- Limit use ("Restriction") – You can ask us to temporarily stop using your data while an issue is being resolved.
- Data Transfer ("Portability") – You can request a copy of your data in a digital format and, if needed, have it sent to another school or organisation.
- Object – You can say no to certain uses of your data, such as direct marketing.

10.2 Special Protections

- No automated decisions – ISR does not make important decisions about students or families using only computers or AI. If this ever changed, you would have the right to be informed and to challenge the decision.

- Profiling – ISR does not use your data to build commercial profiles. If we ever needed to do detailed analysis that could significantly affect you, we would always ask for explicit consent first.

To use any of these rights, simply contact our Data Protection Officer at dataprotection@isr.ch. We will respond as quickly as possible and always within the timeframes set by Swiss law.

11. Complaints

Members of ISR's community who have concerns about the way their personal data is being processed can contact the Data Protection Officer. In addition, complaints can also be made using the process as outlined in the ISR Complaints Policy. The ISR Community also has the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner (FDPIC).

12. Review

This Data Protection Policy will be reviewed every 3 years to ensure that it remains compliant with applicable data protection laws and regulations.

NB - Last policy review led in 2025 by Anita Boakyewaah, Data Protection Officer (DPO) and IT Support Assistant, Gus Alcalá, Education Technologies Development Lead and Liz Free, CEO and Director