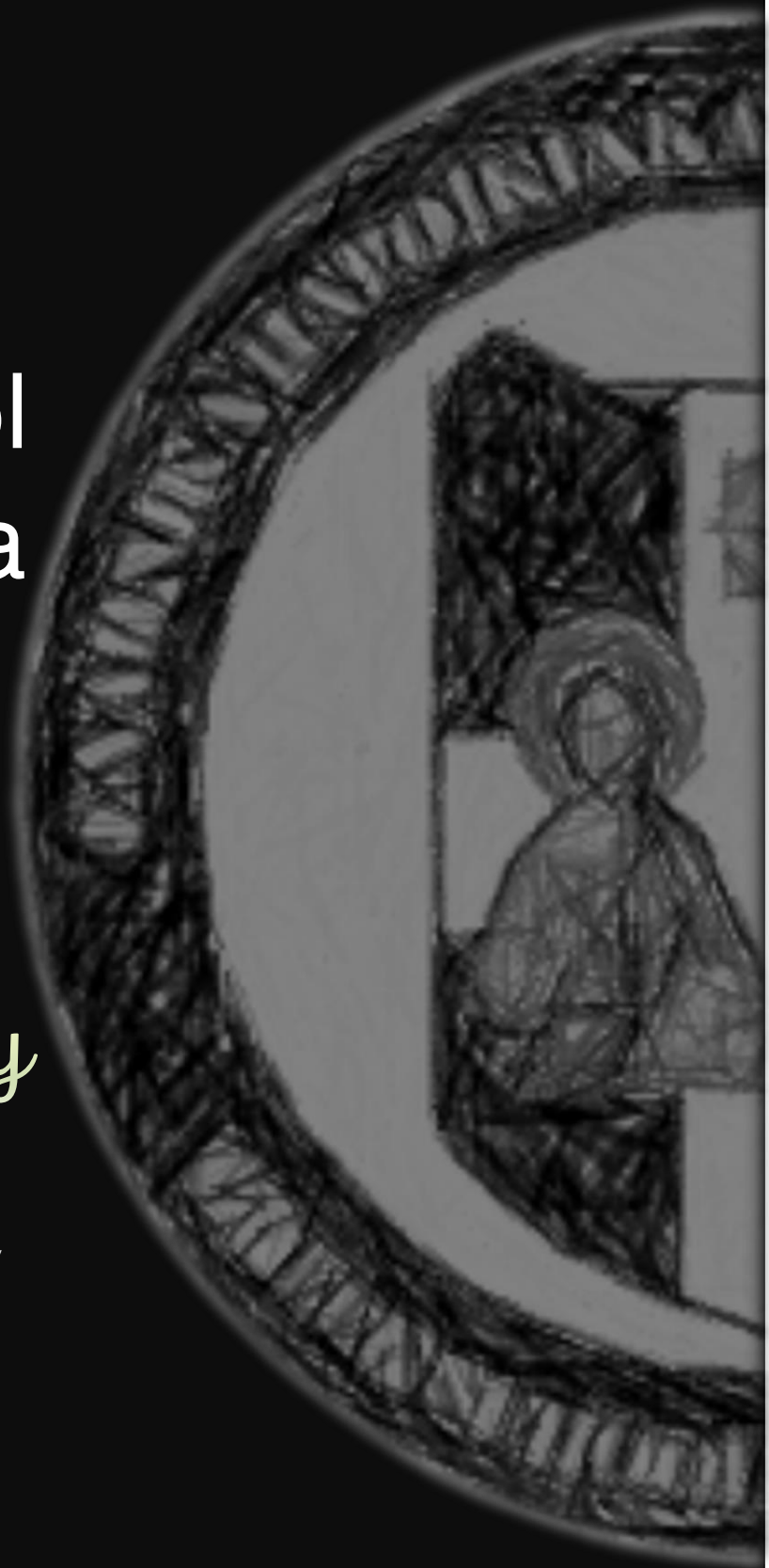


Greek School *of* Ayia Triada Birmingham

Key Holder Policy

This document defines the term and sets out the principles, practices and procedures which Greek School of Ayia Triada will follow with regards to the people who hold school keys as well as their duties and responsibilities



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KEY HOLDERS POLICY

A. Introduction: *Why this policy is introduced*

Status: while the policy itself is non-statutory there is legislation covering data protection which must be adhered to. Authorised key holders in our school will be fully complying with this policy.

Authorised key holders are entrusted with keys to the school to carry out the education objectives of the school. Because possession of a school key gives authorised persons unfettered access to the school grounds, to the students, and to sensitive records, all parties in possession of a key must keep the goals of confidentiality and safety in mind at all times. For this reason, this policy aims at highlighting the principles and procedures followed for those people assigned key holder responsibilities

Important Terms:

- **Key Holder** – A **key holder** is the person to whom one or more **keys** are issued, or for which they are in possession. By possessing a **key**, the **key holder** must not compromise the security of any area/building.
- **Temporary Key Holder** is the person to whom one or more **keys** are issued **only for a temporary period** of time which it is stated on a document that this person is signing and in the absence of the main key holder of the school, or for which they are in possession. By possessing a **key**, the **key holder** must not compromise the security of any area/building.

Authorised People:

Headteacher: Stella Tryfonos

Lead Teacher: Despoina Fragkou [in the absence of the Headteacher- temporary]

Chair of Management Board: Katerina Jordanou

Vice Chair of Management Board: Chrisoulla Elia [in case of absence of Chair-temporary]

Site Manager: Fotoula Lytras

Examinations Officer: Magda Koufomeriti

Contracted Key holder: Fotoula Lytra

Who must comply with this policy

This policy must be followed by anyone who is an authorised key holder:

- Only authorised persons are allowed to be in possession of a key to the school. Authorised persons are only those persons with documentation of authority to possess or control a key. Authorisation is specific to each key issued.
- No person may give his or her key to an unauthorised user for any period of time without authorisation from the headteacher. Any key(s) found to be in the possession of an unauthorised person will be confiscated and any person found to have provided a key or a copy of a key to an unauthorised user may be considered as gross misconduct and the appropriate investigation will take place under the school policy.
- In the event of illness on the part of the keyholder and the keys need to be returned to school; the keys must be collected by another keyholder or person authorised by the headteacher.

- Unauthorised duplication of a key is strictly prohibited. No person may duplicate a key or request the duplication of a key without express, written permission. See Appendix C
- Lost or stolen keys must be reported to the headteacher immediately. A lost key may require one or more locks to be replaced. This process may cost a substantial amount of money. If this happens on more than one occasion, the school, where permitted by applicable laws, may withhold the cost of rekeying the building(s) from the key holder's salary.
- Key holders agree to refrain from compromising the security of the building. Key holders are required to report to the headteacher any doors that they are unable to secure or are found unsecured. The premises must not be left unattended where doors or windows are knowingly unsecured.
- On request, employees must return all keys assigned to them or that are in their possession or control in the event of termination of employment or suspension.
- Violation of these requirements may result in the loss of key privileges and will result in an investigation.
- If a member of staff is not in possession of their keys, e.g. out of normal working hours or school holidays, they must give careful consideration as to where their keys are left. Keys must be kept separately to any other data which might be able to identify them as keys for the school building. E.g a security pass. All efforts must be made to store them separately from papers or diaries etc. which identify the school; in case of home burglary. School keys should not be left unattended in cars.

Checklist for Key holders when leaving the premises

Prior to setting the alarm system, key holders should ensure that:

- all doors and windows are closed and securely locked (this is the most important check)
- there are no staff, contractors, parents, students, volunteers or visitors remaining in the premises (apart from any staff who may be acting as escorts to the key holder)
- there is nothing in an area covered by movement detectors which is likely to cause false alarms, for example, swinging signs or badly stacked stock which may fall over.
- there is nothing that may limit the area normally covered by the detector, for example, stock stored in front of the detector
- the key holder is ready to leave as soon as the setting procedure is initiated.

If key holders do not fully set the alarm in accordance with the insurer's requirements and intruders then break in, any subsequent insurance claim may not be paid.

If the alarm cannot be set in its entirety (including all means of signalling); the alarm company must be called. The premises should not be left unattended until the fault has been put right and the alarm has been set correctly and fully.

1. Reviewing & Version Control

The efficacy of this policy will be reviewed every four years by the governing body- The Greek School of Ayia Triada Management Board. If the school decides to change the way in which it uses this policy, this will be pursuant through a Management Board meeting.

Version Control

Version Name/actions	Date	Reason for Update
Introduced Key Holders Policy	Sept 2018	Not in place. Up to this date only two people where key holders of the school, plus the authorised site manager of the Greek Cypriot Association. Due to the changes in legislation and the GDPR, it was thought that the school needs to have recorded and named those people who have been handed key holder's responsibilities. This is to be reviewed a year from September 2018 and then every [4]four years
Review	01/09/2019	Reviewed and approved
Review	01/09/2020	Reviewed and Approved
Review	20/09/2022	Reviewed and Approved
Next Review	01/09/2024	

Appendix A

Receipt of Keys Acknowledgement Form

I _____ confirm that I have received Key(s)
for _____

<p>Before the keys/pass can be issued you are asked to sign the declaration below and acknowledge the conditions of issue.</p> <p>This is to help carry out the policy of the Greek School of Ayia Triada Birmingham to safeguard children, young people and adults who are vulnerable in its care. The Greek School of Ayia Triada Birmingham is not obliged to give anyone access to church premises unless access to the premises is required as part of their role or for regular hire of the premises.</p> <p>I have never been convicted or cautioned for any offence concerning children, young people or vulnerable adults.</p> <p>Signed: Date:</p>	<p>These keys/pass/entry code are issued to you under the following conditions.</p> <ol style="list-style-type: none">1. You shall not have any copies made from the keys/pass.2. These keys/pass should not be lent to anyone else.3. On completion of your term of office these keys/pass shall be returned to the 'Headteacher' and not handed over to another person.4. Where entry code numbers are given instead of a key/pass this information will not be given to anyone else. <p>I accept the above conditions of issue.</p> <p>Signed: Date:</p>
<p>Keys Issued:</p> <ol style="list-style-type: none">1.2.3.	

A COPY OF THIS AGREEMENT SHOULD BE RETAINED BY in the policy folder of the School
WHERE IT WILL BE RETAINED IN A SECURE AND CONFIDENTIAL MANNER.
NB. All information will be held in accordance with current data protection legislation.

Keyholder Privacy Notice

1. Why have I been given a privacy notice?

You have been given this privacy notice because you have offered to act as a keyholder for the **Greek School of Ayia Triada Birmingham, Magnet Centre, Park Approach, B23 7SJ**. The Greek School of Ayia Triada Birmingham is committed to the protection of your rights under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This notice will inform you of your rights and provide information about how we hold and use your personal data.

2. What is personal data?

This is information, which indirectly or directly allows you to be identified via circumstances or specific details. It may include data such as names, addresses and dates of birth.

How do we process your data?

In compliance with the GDPR, the Greek School of Ayia Triada Birmingham makes the following commitments about the processing of your data:

- Information will not be processed beyond what is necessary for the keyholder activities.
- Data about you will be kept up-to-date and records amended to address factual inaccuracies as soon as possible (Either Management Board Folder or Policies Folder- this declaration will be destroyed a year after submitting the keys).
- We will store information securely, with the use of sufficient measures to protect your data from unauthorised access, loss or misuse.
- We will destroy data that is no longer required in a safe and appropriate manner.

We will use your personal data for the following purposes:

(Amend or add additional processing activities to fit individual circumstances)

- to maintain an electronic record of those who are willing to act as a keyholder for **GREEK SCHOOL OF AYIA TRIADA BIRMINGHAM** held by **[Headteacher: Dr S. Tryfonos, OR MANAGEMENT BOARD SECRETARY IN THE MANAGEMENT BOARD FOLDER]**
- to provide contact details of keyholders to parties who may need access to the building including emergency services/maintenance contractors and users of the facilities
- to inform you of information and updates that may be relevant to your role as keyholder.

3. What is the lawful basis for processing your personal data?

- Processing is necessary for the legitimate interests of the Greek School of Ayia Triada Birmingham in Britain to enable you to undertake the role of keyholder within the Greek School of Ayia Triada Birmingham in accordance with safeguarding policy and practice.
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided:
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and
 - there is no disclosure to a third party without consent.

4. Sharing your personal data

Your data will be held in confidence and will be shared only where necessary with other members of the church or those engaging with church in order to facilitate the role and activities identified above. You will be informed if any further sharing of information is deemed necessary and your consent for this will be obtained, where appropriate.

5. How long do we keep your personal data?

Records of keyholder contact details held locally will be retained for the period of your engagement with this role. We destroy all information a year after submitting the keys and

6. Your rights and your personal data

You have the following rights with respect to your personal data in relation to data held about you relating to safeguarding:

- the right to request a copy of your personal data which is held about you by the Greek School of Ayia Triada Birmingham
- the right to request that the Greek School of Ayia Triada Birmingham corrects any personal data if it is found to be inaccurate or out of date
- the right to request that the data controller provides you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
- the right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- the right to object to the processing of personal data
- the right to lodge a complaint with the Information Commissioner's Office.

7. Relevant Contacts

The Data Controller for Greek School of Ayia Triada Birmingham Purposes which covers routine data processing activities.

For data processing relating to safeguarding, complaints and discipline the Data Controller is the Greek School of Ayia Triada Birmingham in Britain. If you wish to make a subject access request concerning data held about you relating to safeguarding, complaints and discipline, it should be sent to the Data Protection Officer at our school-communicationsdept@greeksat.org.uk

Greek School of Ayia Triada Birmingham House
Magnet Centre
Park Approach
B23 7SJ
Erdington-Birmingham

All other subject access requests should be sent to:

GSAT MD Greek School of Ayia Triada Birmingham Purposes
Magnet Centre
Park Approach
B23 7SJ
Erdington-Birmingham
Tel.07842020089

Further information is available from the GSAT website: <https://www.greeksat.org.uk>

If you have any queries about data processing for keyholders, please contact the Chair of Management Board or the lead Designate Safeguarding Lead.

Appendix B

School Key Responsibility Form

I acknowledge that I have received the keys listed below. I understand that it is my complete responsibility to keep these keys in a safe place. I will not allow access by students, unauthorised staff or any individual not directly associated with the school.

I understand that under no circumstances am I to duplicate any key for which I am an authorised holder.

I am aware that if I lose this key, it is my responsibility to immediately report to the headteacher that the key has been lost and to report the last location and time when I had it in my possession. Within the remit of the policy I understand that I may be charged for a replacement key.

I understand that once my employment ends with the school, it is my responsibility to return the se keys immediately and that until I do so, the school may withhold my salary or part thereof.

I understand that as a Key holder I have access to information areas (i.e office, cabinets, exams room) and I understand that is against the law to use my priviledge as a key holder to gain access to, to use, share, distribute information.

I understand that failure to return the keys on request will be notified to the police as theft. List of keys in authorised person’s possession, tick as appropriate:

- External gates
- Internal gates
- Master Key (Internal ---if there is one)
- Main door
- Outdoor Storage
- Fire exit door (all school external fire doors)
- Shutters main entrance, headteachers office, early years
- External doors near alarm

Others as specified below:

1.
2.
3.
4.
5.
6.

I agree to abide by the Key Holders’ Policy with regard to these key and all school keys in my possession.

I understand that failure to comply with my duties as key holder may lead to serious consequences and may result in legal action by the school

Staff Name (Print):(.....) **Date:**
Signature:

Appendix C

School Key Duplication Consent Form

Details of key to be copied and cut including reference number and what the key is used for and reason for key being cut:

Name of Person taking the key to be cut: _____

Authorised by: _____

Name: _____

Date: _____

Signature: _____