



## Privacy Notice for pupils, parents and carers

We need to provide you with information about how your personal data (information about you) will be used and protected. This letter might be difficult for you to understand, you can ask your parents/carer or another adult such as your teacher to help you understand it.

<b>Who we are</b>	Your school is part of the Learning in Harmony Trust Multi Academy Trust, which will be referred to as 'the Trust' in this document. The Trust is the organisation which is in charge of the safety and security of the personal information that the school holds about you. This means the Academy Trust is called the Data Controller.
<b>Contact details</b>	<p><b>Mail:</b>                    <b>Learning in Harmony Trust,</b>  Sheringham Primary school,  Sheringham Avenue  Manor Park  E12 5PB</p> <p>The <b>Data Protection Officer</b> is responsible for overseeing data protection within the School so if you do have any questions in this regard, please do contact them on the information below: -  Data Protection Officer: Craig Stilwell  Company: Judicium Consulting Ltd  Address: 72 Cannon Street, London, EC4N 6AE  Email: <a href="mailto:dataservices@judicium.com">dataservices@judicium.com</a>  Telephone: 0203 326 9174</p>
<b>Categories of information that we collect, hold and share</b>	<p><b>Personal information:</b> Full name, date of birth, unique pupil number and name, address, National Insurance number and date of birth of parents, digital images of our pupils</p> <p><b>Characteristics:</b> Language, nationality, country of birth and free school eligibility</p> <p><b>Attendance information:</b> sessions attended, number of absences and absence reasons, exclusion information</p> <p><b>Sensitive data:</b> Ethnicity, medical information, biometric data</p>
<b>Sources of personal data</b>	<ul style="list-style-type: none"> <li>● Pupil</li> <li>● Parent/carer</li> <li>● The trust and individual schools may also receive information about pupils from their previous nursery, school, local authority and / or the Department for Education (DfE).</li> <li>● For pupils in our schools teaching Key Stage 4 and enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about a pupil's learning or qualifications.</li> <li>● CCTV</li> </ul>
<b>Why and how we use your information</b>	<p>We use this personal data to:</p> <ul style="list-style-type: none"> <li>● support learning</li> <li>● monitor and report on progress</li> <li>● provide appropriate care and pastoral care; and</li> <li>● assess the quality of our services</li> <li>● to comply with the law about sharing personal data</li> </ul>

- For security and safety purposes - Images of parents, pupils and other visitors to the School will be captured by our CCTV system which monitors public areas including the main entrance used by visitors, the pedestrian and vehicle gates, and the entrances to all other School buildings. Trust Schools do not have internal CCTV cameras, with the exception of Sheringham Primary School, Blenheim Primary School and JFK School which monitors CCTV in non-class based public internal areas.

#### When we give your information to others

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- our relevant local authorities
- the Department for Education (DfE)

When the need arises, we will also disclose your personal data as follows:

- Disclosures connected with Special Educational Needs support -e.g. non-LA professionals
- Disclosures connected with Education, Health and Care Plans
- School nurse
- School counsellor
- CAMHS (Child and Adolescent Mental Health Service)

For our Key Stage 3 schools with pupils in year 7 and above: once our pupils reach the age of 13, the law requires us to pass on certain information to the relevant Local Authority who have responsibilities in relation to the education or training of 13-19-year olds.

We may also share certain personal data relating to children aged 16 and over with post-16 education and training providers to secure appropriate services for them.

A parent / guardian can request that **only** their child's name, address and date of birth be passed to London Borough of Newham by informing the school. This right is transferred to the child once he / she reaches the age 16.

For all schools: We are required, by law (under regulation 5 of the Education (Information about Individual Pupils) England Regulations 2013, to pass some information about our pupils to the Department for Education (DfE). This is the part of the Government which is responsible for schools. This information may, in turn, then be made available for use by the Local Authority.

The DfE may also share information about pupils that we give to them, with other people or organisations. This will only take place where the law, including the law about data protection allows it.

#### **The National Pupil Database (NPD)**

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

To contact DfE: <https://www.gov.uk/contact-dfe>

To find out more about the pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to [National pupil database: user guide and supporting information - GOV.UK](#).

In all cases we will not give information about our pupils to anyone without your consent unless the law and our policies allow us to do so.

#### **Legal basis for using your personal data**

Our use of your information for the purposes outlined in this notice is lawful for one or more of the following reasons:

- The Trust is under a legal obligation to collect the information, or the information is necessary for us to meet legal requirements imposed upon us such as our duty to safeguard pupils.
- It is necessary for us to hold and use your information for the purposes of our functions in providing schooling and so we can look after our pupils. This is a function which is in the public interest because everybody needs to have an education. This means we have a real and proper reasons to use your information.
- Where we are not required by the law to disclose your information we will share your personal information in your vital interest.
- We will not usually need your consent to use your information, however we request consent to use photographs and videos of pupils, to contact parents about their pupils and school life via the ParentMail system and to use pupil biometric data in schools where cashless catering systems are in use.

If at any time it appears to us that we would like to use your personal data in any other way which is not part of our job as an Academy Trust / School but we are involved because we think it would benefit our pupils. In such cases we will explain to you what we want to do and ask for your consent, which we will ask your parents to give until you are old enough to understand.

The information disclosed to services will include sensitive personal information about you. Usually this means information about your health and any special educational needs or disabilities which you, our pupil, has. We do this because these people need the information so that they can support you.

Our disclosure of your personal data to, Special Educational Needs support -e.g. non-LA professionals, Education, Health and Care Plans, School nurse, School counsellor, CAMHS (Child and Adolescent Mental Health Service) is lawful for the following reasons:

- The Trust is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our pupils and protect them from harm.
- It is necessary for us to disclose your information for the purposes of our functions in providing schooling. This is a function which is in the public interest.
- We have a legitimate interest in disclosing your information because it is necessary to provide our pupils with education and pastoral care and connected purposes as outlined above.
- We will not usually need consent to disclose your information. However, if at any time it appears to us that we would need consent then this will be sought before a disclosure is made.

**Your right to withdraw consent**

You have the right to withdraw that consent at any time. If you do, it will not affect the lawfulness of any processing for which we had consent prior to your withdrawing it.

**Location of your personal data**

We store all our information centrally in a main pupil database system, this is a secure system which is encrypted and password protected and access to the information is limited to those that need it on a case by case basis. We also have hard copy records of some information and these files are kept securely and only accessible to those that need to access them on a case by case basis.

Other non-statutory systems are used to help us achieve our public interest goal of providing an education, which are password protected. Examples of these systems are G-Suite for Education, MyMaths, Education City, ParentMail and catering systems.

[CCTV images do not leave School premises and are never shared with any third party, with the potential exception of law enforcement agencies in the event of a security breach. Images are kept for no longer than 30 days](#)

We do not normally transfer your information to a different country which is outside the European Economic Area. This would only happen if one of your parents lives abroad or if you move to a new school abroad. If this happens we will be very careful to make sure that it is safe to transfer

	<p>your information by ensuring that the other country has good data protection laws. If we cannot be sure that it is safe then we will talk to you and your parents about it and make sure that you are happy for us to send your information.</p>
<p><b>How long we will keep your personal data for</b></p>	<p>We only keep your information for as long as we need to or for as long as the law requires us to. Most of the information we have about you will be in our pupil file. We usually keep these until your 25<sup>th</sup> birthday unless you move to another school in which case we send your file to your new school.</p> <p>We have a policy which explains how long we keep information. It is called a Records Retention Policy and you can find it on our website.</p>
<p><b>Your rights in respect of your personal data</b></p>	<p>You have these rights under the law relating to data protection:</p> <ul style="list-style-type: none"> <li>● You can ask us for a copy of the information we have about you (Subject Access Request)</li> <li>● You can ask us to correct any information we have about you if you think it is wrong</li> <li>● You can ask us to erase information about you (although we may have good reasons why we cannot do this)</li> <li>● You can ask us to limit what we are doing with your information</li> <li>● You can object to what we are doing with your information</li> <li>● You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.</li> </ul>
<p><b>Complaints</b></p>	<p>If you have any concerns or complaints about how we are handling your data please do not hesitate to contact our Data Protection Officer at the address given above.</p> <p>If you are unhappy with how we have handled you complaint you can also contact the Information Commissioner's Office:</p> <p>Information Commissioner's Office</p> <p>Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.</p>
<p><b>Further information</b></p>	<p>There is more information in our Data Protection and Breach Management Policy, Retention Policy and our Use of Images Policy which can be found on our website.</p>