**Lache Primary School Privacy Policy**

**1. Introduction**

Lache Primary School takes the privacy of our pupils extremely seriously. In this policy, we set out how we collect and process the personal data we hold on our pupils.

This policy applies where Lache Primary School (referred to as “we”, “us” or “our” in this privacy notice) identify as the data controller and where we are responsible for personal data.

**Contacting us**

Lache Primary School have appointed a Data Protection Officer (DPO), who will be responsible for privacy matters and the protection of personal data we hold, the DPO’s details are below:

**Name: Sarah Webb
Email address:** sarah.webb@e2e-integration.co.uk

**Telephone number: 07791 488938**

**Making complaints**

If you are unhappy with the way we collect or process personal information, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO) who are the UK’s supervisory authority for data protection.

Complaints and concerns can be lodged with the ICO via this link: <https://ico.org.uk/concerns/>

We kindly ask that before any complaints are lodged with the ICO, that you contact us first to try and resolve any issues you may have.

**2. What data do we collect?**

The data we process on our pupils includes:

* Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
* Characteristics (such as ethnicity, language, and free school meal eligibility)
* Safeguarding information (such as court orders and professional involvement)
* Special educational needs (including the needs and ranking)
* Medical and administration (such as doctors’ information, child health, dental health, allergies, medication and dietary requirements)
* Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
* Assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
* Behavioural information (such as exclusions and any relevant alternative provision put in place)
* Photographs and CCTV footage captured on the school premises

**Sensitive data**

Lache Primary School collects sensitive data on our pupils. Under the General Data Protection Regulation/Data Protection Act (2018), sensitive personal data is data which includes information about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health, genetic and biometric data.

If you want to find out more about sensitive personal data and why we hold it, please contact our DPO.

**3. How do we use pupil data?**
We will only use pupil data for the following reasons:

* To support pupil learning
* To monitor and report on pupil attainment progress
* To provide appropriate pastoral care
* To assess the quality of our services
* To keep children safe (food allergies, or emergency contact details)
* To meet the statutory duties placed upon us for DfE data collections

**4. How do we obtain pupil data?**

We collect pupil information via:

* Admission forms
* Ethnicity Form
* Data collection sheet updates at parent’s evening
* Residential visits
* Sporting participation agreement forms
* Contact details updates book
* Asthma / medical register
* Pick-up lists

Pupil data is essential for the schools’ operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

**4. Our lawful purposes for collecting and processing pupil data**

We have identified that we will use pupil data for the following reasons:

* To comply with a legal or regulatory obligation
* To perform an official task in the public interest
* Where it is necessary for our legitimate interests.
* To protect the individual’s vital interests (or someone else’s interests)
* With the explicit consent of a parent or guardian.

Where we rely on consent as a lawful purpose for processing pupil data, parents and guardians have the right to withdraw consent (where applicable) at any time by contacting our DPO.

**5. Who do we share pupil data with?**
We may need to share pupil data with third parties in order to provide our services or to protect individual vital interests, these parties include:

* Our local education authority (LEA)
* The Department for Education (DfE)
* Pupil’s families and guardians
* Education and examination bodies
* Regulators (such as Ofsted)
* Suppliers and service providers
* Auditors
* External research organisations
* Healthcare authorities and other care organisations
* Advisers and consultants
* Charities and voluntary organisations
* The Police, courts and tribunals
* Professional bodies

Where we do share pupil information with third parties, Lache Primary School ensures that the highest levels of data protection are in place in accordance with the law. Third parties with whom we share data are only permitted to process this data for the specified purposes we stipulate with them.

We do not sell pupil data onto third parties.

**6. International transfers**

Where possible, we ensure that pupil data is stored within the European Economic Area (EEA), however some of our storage locations and service providers may be hosted outside of the EEA. When we do need to transfer pupil data out of the EEA, we ensure one of the following safeguards are in place to provide a similar level of security of your data:

1. Pupil data has been transferred to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission; or
2. The hosting environment we use has specific contracts, codes of conduct or certification mechanisms in-place which have been approved by the European Commission; or
3. Where we transfer data to the United States, we ensure our providers are certified as part of the EU-US Privacy Shield programme.

If none of these safeguards are available, we will only transfer pupil data with the explicit consent of a parent or guardian – which can be removed at any time by contacting us.

**7. Retention periods**

Pupil data will be retained in accordance with our data retention policy which categorises all of the data assets held by us and specifies the appropriate retention period for each data asset.

These periods are based on the requirements to keep the data for as long as necessary to fulfil the purpose for which it was collected, to meet any legal requirements or to satisfy any reporting, accounting or contractual needs.

Please contact our Data Protection Officer if you would like further information on our retention periods.

**8. Your rights**

Under the General Data Protection Regulation/Data Protection Act (2018), parents and guardians have certain rights regarding pupil data, these include the right to:

* Request access to pupil data
* Request correction of pupil data
* Request erasure of pupil data
* Object to processing of pupil data
* Request restriction of processing of pupil data
* Request transfer of pupil data
* Withdraw consent

You may exercise any of these rights by raising a subject access request with us. You can do this by contacting our Data Protection Officer.

We will not charge you for making a request and we will make all reasonable efforts to respond to you within 30 days. Sometimes it may take longer than 30 days to gather all the information we may hold on you, in this situation we will keep you updated at all times.

We may refuse your request or withhold any personal information that you request if there is an overriding legal reason for us to do so.

**8. Information security**

Lache Primary School takes the information security extremely seriously. In order to protect pupil data, we implement a risk-based approach to adopt the strongest organisational and technical controls in order to protect the confidentiality, integrity and availability of the data we hold.

**9. Changes to this privacy policy**

We keep this policy under regular review. This policy was last reviewed on 24th July 2018. Any questions about this policy can be directed to our Data Protection Officer.