



INDEPENDENT JEWISH DAY SCHOOL an ACADEMY

The Independent Jewish Day School is committed to ensuring that we are transparent about the ways in which we use your personal information and that we have the right controls in place to ensure that it is used responsibly and is kept from inappropriate access, theft or misuse.

This document explains how we use your personal information, why we need the information, how it is collected, the legal basis for collection, about your privacy rights and how the law protects you. This document also explains who we share the information with and why, how long we keep your information for and how to exercise your rights in relation to that information.

Personal Information (including Parents)

Personal information can be anything that identifies and relates to a living person. This can include information that when linked to other information, allows a person to be uniquely identified.

For example; Names of staff and pupils, dates of birth (dob), addresses, National Insurance numbers (NI), school marks and assessments, medical information, exam results, SEN assessments and data, staff development reviews, financial details, free school meal eligibility.

The law treats some types of personal information as 'special' because the information requires more protection due to its sensitivity.

This information consists of; racial/ ethnic origin, sexuality/ sexual life, religious/ philosophical beliefs, trade union membership/ political opinions, genetic/ bio-metric data, physical/ mental health, criminal convictions/ offences.

Purposes

We collect, store, maintain and share information for a number of different reasons. These include to;

- Support pupil learning and the delivery of education,
- Monitor and report on pupil progress,
- Provide the appropriate pastoral care,
- Assess the quality of our provision,
- Comply with the law regarding data sharing,
- Comply with our statutory obligations.
- For fundraising purposes, (PTA)
- To make contact with regard to voluntary contributions and other initiatives in order to fundraise for the school,
- To ensure provision for health and safety.

Legal basis for processing data and information sharing

We process personal data as the law requires. For all other processing, we will collect personal information where;

- you, or your legal representative, have given consent,
- you have entered into a contract with us,
- it is required by law,
- it is necessary for employment related purposes,
- it is necessary to deliver health or social care services,
- it is necessary to protect you or others from harm,
- it is necessary to protect public health,
- it is necessary for exercising or defending legal rights,
- you have made your information publicly available,
- it is necessary for archiving, researching or statistical purposes,
- it is necessary in the substantial public interest for wider societal benefits and is authorised by law,
- it is necessary for fraud prevention and the protection of public funds,
- it is in our legitimate interests, provided your interests and fundamental rights do not override those interests.

Your personal information may also be shared with other organisations such as those who assist us in providing services and those who perform technical operations such as data storage and hosting on our behalf.

If you fail to provide information to us we may be prevented from complying with our legal obligations

Data transfers beyond EEA (European Economic Area) <https://www.gov.uk/eu-eea>

We'll only send your data outside of the European Economic Area (EEA) with your consent, or to comply with a lawful and legitimate request or if we use service providers or contractors in non EEA countries.

If we do transfer your information beyond the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. Safeguards will be put in place, following guidance from the European Commission Justice website on https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en.

If we intend to make a transfer in response to a lawful and legitimate request we will tell you in advance unless there are compelling reasons, such as law enforcement or reasons of safety which justify not doing so.

Data Retention

We will only keep your personal information for as long as the law specifies. Where the law doesn't specify this, we'll keep your personal data for the length of time determined by our requirements, then it will be removed or destroyed.

How we keep your information safe

We are committed to ensuring your personal information is safe and protected from accidental loss or alteration, inappropriate access, misuse or theft. As well as technical, physical and organisational controls, we recognise that a well-trained, informed and security alert workforce minimises privacy risks from human error and or malicious threats. We require our service providers to implement appropriate industry standard security measures. We only permit them to process your personal information for specific purposes, in accordance with our contractual instructions.

How we use workforce (staff) information

We collect personal informations such as; Name, dob, address, employee and teacher number, NI, contact information, hours worked, post held, salary, qualifications, ID photograph, pension details, bank details, HMRC declarations, employee benefits, performance management records, absence data.

We collect special information such as; ethnicity, nationality, health data, occupational health referrals, DBS details, correspondence relating to sickness absences.

We use the information to; enable individuals to be paid, form a comprehensive picture of the workforce and how it is deployed, inform the development of recruitment and retention policies, to safeguard individuals, to produce the single central record, to carry out performance management.

The information is collected under the following lawful basis; that it is necessary to perform contractual duties, that it is necessary to comply with any legal obligations required of us, that you have given consent to process special data. The data collected is essential for the school's operational use. The majority of information collected is mandatory, however, some of it is requested on a voluntary basis and you will be informed at the point of collection which data you are required to provide or if it is optional.

The information is held securely for the set amount of time that an individual is employed by our school and for 6 years after the employment termination date.

The information is shared with the Local Authority and the Department for Education (DfE) who commit to only using the data for the purposes which correspond with their statutory duties and will not pass on any information to third parties without specific agreement. Data is transferred electronically via an agreed encrypted secure system.

<https://www.gov.uk/government/publications/security-policy-framework>
<https://www.gov.uk/education/data-collection-and-census-for-schools>

How we use Pupil information

We hold, collect and share personal information such as; name, gender, dob, image, class details, admission data, GP details, dietary requirements, school history, attendance records, behaviour notes, information from the local authority, any Court related documents and information from other bodies and other professionals in relation to your child. We also hold special information such as; nationality, country of birth, free school meal eligibility, medical needs, assessment data, SEN status, disability status.

The information is shared with a number of services in order to comply with our statutory duties as well as to provide appropriate support for our pupils, including; the Local Authority, health services, schools that pupils attend after leaving us, DfE.

The consent of parents may be relied upon to process some forms of data and we will require consent from parents in the following circumstances;

- To allow us to process the personal and sensitive information for school visits, such as name, dob, contact details and medical needs.
- When taking photographs of pupils to be used within the school environment and school website.
- When taking photographs by a third party.

You have the right to withdraw your consent at any time, without affecting the lawfulness of our processing prior to your withdrawal. Please contact the school office should you wish to withdraw your consent for any of the above specified activities.

Information held is stored securely and only shared via an agreed encrypted secure system. The information is held by the school for ;

- Personal details = duration of time in school then passed to new school.
- Academic records = year of exam + 6 years then destroyed.

- Behaviour records = duration of time in school.
- Attendance records = current date + 3 years.
- Medical records = current date + 3 years, passed to new school setting and paper copies destroyed.
- SEN = dob + 25 years, passed to new school setting.
- Child Protection Information = dob + 25 years, passed to new school setting.
- Images = used during duration at school then destroyed.

You can find out more about the data collection requirements placed upon us by the DfE at <https://www.gov.uk/educational/data-collection-and-census-for-schools>

Some of the information that we are required by law to share with the DfE is then stored in the National Pupil Database (NPD).
<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

Some of the information that we provide is shared by the DfE.
<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

How we use Safeguarding Information

The categories of information that we collect, process, hold and share include;

- Personal information such as; dob, address, contact information.
- Special categories of information such as; notes of concerns, attendance data, information relating to a Child in Need (ie, referral information, assessment information, Section 47 information), Initial Child Protection information and Child Protection Information, outcomes for LAC (ie, whether health and dental assessments are up to date, strengths and difficulties questionnaire scoring), adoptions (ie, dates of court dates and decisions made), Education Health Care Plans.

The information is used to; support children, monitor their progress, provide pastoral care, assess the quality of provision, monitor the welfare and safeguard our pupils.

We are required to process pupil data when undertaking our legal obligations and to comply with statutory duties. We are either legally required to have the information or alternatively to process the information through a legal obligation as there is a high risk to the pupils.

The statutory guidance that we follow is 'Keeping Children Safe in Education 2018' and 'Working Together to Safeguard Children 2018'. This guidance can be found at;

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

The information is shared via an agreed encrypted e-mail and is stored securely in school. It is shared with the DfE and other services on a statutory basis, under Section 83 of the 1989 Children's Act, Section 7 of the Young People's Act 2008, Section 3 of the Education Regulations 2013 (Information about individual pupils).

How we use CCTV information

The school will only use surveillance cameras for the safety and security of the school and its staff, pupils and visitors. Surveillance is only used as a deterrent for violent behaviour and damage to the school.

We use the information, such as, images and video footage of pupils, parents, staff and visitors to; maintain a safe environment, ensure the welfare of pupils, staff and visitors, deter criminal acts, assist the police and security services in identifying persons who have committed a crime, support with the prevention and detection of crime including the apprehension and prosecution of offenders by providing images that might be used in evidence in court proceedings.

The information is collected on the following legal basis; public task and identification purposes.

Information captured by CCTV is not kept for longer than necessary. On occasions, such as criminal investigations, images may need to be kept for longer. In this case, the images will be kept in a locked area accessible by security services only. When no longer needed the images will be destroyed and this will be documented. Recorded images are only to be viewed by approved staff in a restricted area and will only be shared when required to do so by law, by court order or to prevent a crime.

Areas where CCTV is used will have clear signage in place.

Rights of individuals

Some rights are absolute, and others are not. If you are not satisfied with how your data has been handled, or how we have answered a request, you have the right to make a complaint to the Information Commissioner.

We would encourage you to raise your concern with the school in the first instance, via the school office on office@ijds.co.uk who will then pass it onto the school's Data Protection Officer (DPO).

Data Breach/Breach Incident

A breach incident is where there is;

- An actual or potential loss of information, or
- An unauthorised disclosure of information, where the incident could affect an individual's privacy, lead to identity fraud, or have some other significant impact on an individual or the school.

A breach can happen by a range of means, for example; the information being lost, stolen, accessed, disclosed or altered without appropriate authorisation.

Guidance on what constitutes a breach under GDPR can be found on the ICO website on;

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Should a breach occur, it should be reported to the Data Protection Officer (DPO) at the Independent Jewish Day School, Mrs Tamar Berman. She can be contacted on tberman@ijds.co.uk.

The DPO will make an informed assessment of the situation and carry out an investigation. The results of this might be, for example; further staff training, reviewing policies, disciplinary procedures, ICO notification.

