

## Inspire Partnership Academy Trust



### Privacy Policy Croydon Hub

Date of Last Review:	November 2022
Date agreed by Trustees:	
Date shared with all staff:	November 2022
Date of next review:	November 2023

## **1. Introduction**

- 1.1. Forest Academy is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of our pupils, parents and staff.
- 1.2. We have therefore developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.
- 1.3. Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

## **2. The information we collect and when**

- 2.1. We only collect information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of information that we will collect includes an individual's:
  - Name
  - Address
  - Telephone number(s)
  - Email address
  - Online identifier
  - Unique Pupil Reference number
  - Education history including attendance
  - Survey responses
  - IP address
  - Racial or ethnic origin
  - Medical information and allergies
- 2.2. The legal basis for processing your data is based on our compliance with a legal obligation that we have stated at the point the information was initially provided, therefore we will not store, process or transfer your data outside the parties detailed above unless we have an appropriate lawful reason to do so.

## **3. How we use your information**

- 3.1. We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:
  - The data needs to be processed so that the school can fulfil a contract with the individual, or the individual has asked the school to take specific steps before entering into a contract

- The data needs to be processed so that the school can comply with a legal obligation
  - The data needs to be processed to ensure the vital interests of the individual e.g. to protect someone's life
  - The data needs to be processed so that the school, as a public authority, can perform a task in the public interest, and carry out its official functions
  - The data needs to be processed for the legitimate interests of the school or a third party (provided the individual's rights and freedoms are not overridden)
  - The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear consent
- 3.2. For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.
- 3.3. If we offer online services to pupils, such as classroom apps, and we intend to rely on consent as a basis for processing, we will get parental consent (except for online counselling and preventive services).
- 3.4. Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

#### **4. Who we might share your information with**

- 4.1. We will not normally share personal data with anyone else, but may do so where:
- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
  - We need to liaise with other agencies – we will seek consent as necessary before doing this
  - Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:
    - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law
    - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share
    - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us
- 4.2. We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:
- The prevention or detection of crime and/or fraud
  - The apprehension or prosecution of offenders
  - The assessment or collection of tax owed to HMRC
  - In connection with legal proceedings
  - Where the disclosure is required to satisfy our safeguarding obligations
  - Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided
  - We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

- 4.3. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## **5. Your rights over your information**

### **5.1. Right to access your personal information**

- 5.1.1. You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.
- 5.1.2. We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.
- 5.1.3. If you would like to exercise this right, please contact us as set out below.

### **5.2. Right to Correction Your Personal Information**

- 5.2.1. If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.
- 5.2.2. If you would like to exercise this right, please contact us as set out below.

### **5.3. Right to Stop or Limit Our Processing of Your Data**

- 5.3.1. You have the right to object to us processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.
- 5.3.2. If you would like to exercise this right, please contact us as set out below.

### **5.4. For more information about your privacy rights**

- 5.4.1. The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.
- 5.4.2. You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

## **6. Parental requests to see the education record**

- 6.1. Parents, or those with parental responsibility, have a legal right to free access to their child's educational record (which includes most information about a pupil) within 15 school days of receipt of a written request.

## **7. CCTV**

- 7.1. We use CCTV in various locations around the school site to ensure it remains safe. We will adhere to the ICO's [code of practice](#) for the use of CCTV.
- 7.2. We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.
- 7.3. Any enquiries about the CCTV system should be directed to the Headteacher.

## **8. Photographs and videos**

- 8.1. As part of our school activities, we may take photographs and record images of individuals within our school.
- 8.2. We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.
- 8.3. Uses may include:
  - Within school on notice boards and in school magazines, brochures, newsletters, etc.
  - Outside of school by external agencies such as the school photographer, newspapers, campaigns
  - Online on our school website or social media pages
- 8.4. Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.
- 8.5. When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.
- 8.6. See our Safeguarding Policy, Staff Acceptable Use Policy and ICT agreement for more information on our use of photographs and videos.

## **9. Security**

- 9.1. Data security is of great importance to Forest Academy and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.
- 9.2. We take security measures to protect your information including:
  - Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data being kept under lock and key when not in use
  - Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access

- Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices. The use of USB devices and external drives is discouraged
- Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment (see our Staff Acceptable Use Policy)
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 8)
- Limiting access to our buildings to those that we believe are entitled to be there (by use of passes, key card access and other related technologies);
- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices and stores.
- Never asking you for your passwords;
- Advising you never to enter your account number or password into an email or after following a link from an email.

## **10. How long we keep your information for**

- 10.1. We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation and never retain your information for longer than is necessary. Please see our Retention Schedule for more information.

## **11. Giving your reviews and sharing your thoughts**

- 11.1. When using our website, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## **12. Links to other policies**

- 12.1. This data protection policy is linked to our:

- Staff Acceptable Use Policy
- Safeguarding Policy
- Online Safety Policy
- Acceptable Use Policy – parents
- Acceptable Use Policy – pupils

### **13. How to contact us**

13.1. If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

- By email: [admin@inspireforest.co.uk](mailto:admin@inspireforest.co.uk)
- By post: School Office, Forest Academy, Bridle Road, Croydon CR0 8HQ