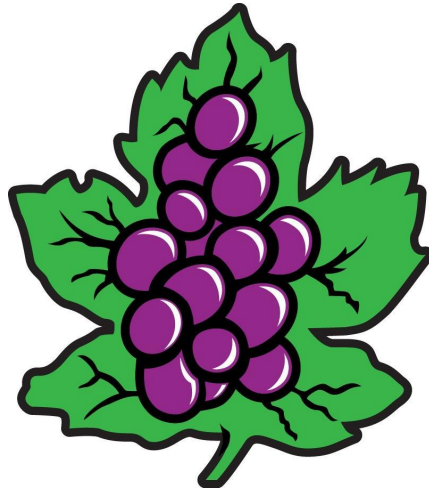




PRIVACY NOTICE FOR PUPILS

Kerem School

Approved by:	Compliance Committee	Date: October 2019
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Last reviewed on:	August 2026	Next review due by: August 2027
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KEREM SCHOOL

(This policy also applies to the Early Years Foundation Stage)

Pupil Privacy Notice

Kerem School is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information about pupils, in accordance with the General Data Protection Regulation (GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Who Collects This Information

Kerem School is a “data controller.” This means that we are responsible for deciding how we hold and use personal information about pupils.

The Categories of Pupil Information That We Collect, Process, Hold and Share

We may collect, store, and use the following categories of personal information about pupils:

- Personal information such as name, pupil number, date of birth, gender and contact information
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance details (such as sessions attended, number of absences and reasons for absence)
- Performance and assessment information
- Behavioural information (including exclusions)
- Special educational needs information
- Relevant medical information
- Special categories of personal data (including ethnicity, relevant medical information, and special educational needs information)
- Images of pupils engaging in school activities, and images captured by the School’s CCTV system

Collecting This Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

How We Use Your Pupil’s Personal Information

We hold pupil data and use it for:

- Pupil admission (and to confirm the identity of prospective pupils and their parents);
- Providing education services and extra-curricular activities to pupils and monitoring pupils' progress and educational needs
- Assessing performance and setting targets for the school
- Safeguarding pupils' welfare and providing appropriate pastoral (and, where necessary, medical) care
- Support teaching and learning
- Giving and receiving information and references about past, current and prospective pupils
- Managing internal policy and procedure
- Enabling pupils to take part in assessments and to record pupil achievements

- To carry out a statistical analysis
- Legal and regulatory purposes (for example, child protection, health and safety) and to comply with legal obligations and duties of care
- Enabling relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate
- Monitoring use of the School's IT and communications systems in accordance with the School's IT security policy
- Making use of photographic images of pupils in school publications, school newsletters and magazines, on the school website and on social media channels
- Security purposes, including CCTV and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.
- To provide support to pupils after they leave the school.

The Lawful Basis on Which We Use This Information

We will only use the information when the law allows us to. Most commonly, we will use the information in the following circumstances:

- Consent: the individual (legal guardian) has given clear consent to process their personal data for a specific purpose
- Contract: the processing is necessary for a contract with the individual
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations)
- Vital interests: the processing is necessary to protect someone's life
- Legitimate interest: to process information for extracurricular activities
- Public task: the processing is necessary to perform a task in the public interest or for official functions and the task or function has a clear basis in law
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: <https://www.gov.uk/education/data-collection-andcensuses-for-schools>.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

We may also need to process **special category personal data** (for example, health, ethnicity or religion). The reasons why we may process this data include:

- to provide a Jewish education in our remit as a faith school
- to safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care;
- to respond to an emergency, incident or accident, which may also require us to share medical or safeguarding information with other relevant people, such as the police or social services;
- to organise school trips or events, which may require us to share information such as dietary and medical information with the organisers of those trips or events;
- to enable us to provide educational services in the context of any special educational needs of a pupil;
- to provide spiritual education in the context of any religious beliefs;
- to enable us to respond to a complaint or disciplinary matter where, for example, it relates to a safeguarding or special education need matter;
- for legal and regulatory purposes (for example, child protection, diversity monitoring and health and safety) and to comply with our legal obligations and duties of care.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it is the only way we can make sure your child can stay safe and healthy or we are legally required to do so. The data in each case is relevant to the running of that particular service or has been agreed to be shared in the general consent form.

We share pupil information with:

- School staff and governors
- Extracurricular club leaders
- Other parents in the class
- Assessment providers eg GL Assessment
- Online journal providers for EYU children
- The school catering company (allergy awareness)
- The Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Independent Schools Inspectorate (ISI)
- Other Schools that pupils have attended/will attend
- NHS
- Welfare services (such as social services, CAMHS)
- Law enforcement officials such as police, HMRC Local Authority Designated Officer
- Professional advisors such as lawyers, consultants and debt collection agencies
- Support services (including insurance, IT support, information security)
- The Local Authority

Without permission from both parents, pupil data will only be shared orally or in writing with parents or legal guardians.

For the most part, personal data collected by us will remain within our school and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records (held and accessed only by appropriate medical staff under his/her supervision, or otherwise in accordance with express consent); and
- pastoral or safeguarding files.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations; we require them to respect the security of the data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection with respect to the personal information. This could include a 'cloud' provider.

Why We Share This Information

We do not share information about our pupils with anyone without consent unless otherwise required by law.

For example, we share students' data with the DfE on a statutory basis, which underpins educational attainment. To find out more about the data collection requirements placed on us by the DfE, please go to <https://www.gov.uk/education/datacollection-and-censuses-for-schools>.

Storing Pupil Data

The School keeps information about pupils on computer systems and sometimes on paper.

Except as required by law, the School only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy. If you require further information about our retention periods, please contact the School office, which can provide you with a copy of our policy.

Security

We have put in place measures to protect the security of the information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). These include lockable cupboards, encrypted emails and password-protected devices and documents.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education 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.

We are required by law to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

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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 robust 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
- 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.

For more information about the Department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

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

Requesting Access to Your Personal Data

Under data protection legislation, parents have the right to request access to information about their child that we hold. To make a request for your child's personal information, please contact the Headteacher in writing.

You also have the right to: -

- Object to the processing of personal data that is likely to cause, or is causing damage or distress
- Prevent processing for the purposes of direct marketing
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Claim compensation for damages caused by a breach of the data protection regulations.

If you want to exercise any of the above rights, please contact the Headteacher in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

The school will endeavour to provide the information without undue delay and normally within one month of the request; however, in certain circumstances, we may be able to extend the time to provide the information by two further months. If that is the case, we will write and let you know.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Headteacher. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the Headteacher in the first instance.

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Other important policies

It is recommended that this policy is read alongside the

- Parent contract;
- Data Protection policy;
- Records Retention Policy;
- Procedures regarding photographs;
- Procedures regarding CCTV;
- Safeguarding, health & safety and complaints policies; and
- IT policies & guidelines, including Acceptable Use & E-Safety