



Privacy Notice for Pupils (provided to parents and carers)

[●] 2018

Dear Parent/Carer,

On 25 May 2018, the EU General Data Protection Regulation and the Data Protection Act 2018 (collectively, the “**Data Protection Rules**”) came into force. The Data Protection Rules regulate how Sacks Morasha Jewish Primary School can collect information about pupils and what we can do with it. We call this information “personal information.”

We are sending this letter to you as the parent or main carer of one or more pupils at the school. This letter explains what Sacks Morasha does with pupil personal information and summarises the rights of pupils regarding that information. We encourage you to read this letter in full and to read our Data Protection Policy available by clicking [\[here\]](#).

In summary, we collect and use pupil personal information to support pupil learning and safeguarding and to provide other services in support of those activities. You can ask us for a copy of the information we have about the pupil or pupils for whom you are responsible, you can ask us to correct any of that information if you think it is wrong, you can ask us to erase that information (although we may have good reasons why we cannot do this), you can ask us to limit what we are doing with that information, you can object to what we are doing with that information, and you can ask us to transfer that information to another organisation in a format that makes it easy for them to use.

For all of the personal information about the pupil or pupils for whom you are responsible which we currently collect and use, we are asking that you consent to that collection and use. Please click [\[here\]](#) to access the online consent form. It will only take a minute to review and complete.

If you have any questions regarding any of the topics discussed in this letter, please ask our acting Data Protection Officer (please see attached) or any member of the senior leadership team and one of them will contact you to provide answers.

Sincerely,

[signature of Jason Marantz]

Chair, Sacks Morasha Jewish Primary School Governing Body

Privacy Notice Regarding Pupil Personal Information

Who we are

We are Sacks Morasha Jewish Primary School (“we” or “us” or “**Sacks Morasha**” or the “**School**”). Sacks Morasha is the organisation which is in charge of pupil personal information. This means the School is called the “**Data Controller**”. Our postal address is 31 Stanhope Road, London N12 9DX. Our telephone number is 020 3115 1900.

If you want to contact us about pupil personal information you can contact our acting Data Protection Officer who in the interim is Mark Nicolaides. You can contact him via the School.

What information we collect

Sacks Morasha collects and holds personal information relating to our pupils. We may receive information about our pupils from the pupils themselves, from their parents and carers, from their previous schools, from the London Borough of Barnet, our local authority (“**Barnet**”) and / or from the Department for Education (“**DfE**”).

The categories of pupil information that we process include, but are not limited to, the following:

- 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 exam results and areas for further focus)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- information about free school meal and pupil premium eligibility
- Information for catering management purposes (for example, whether the pupil has school dinners and how often)
- information about the pupil’s parents and carers

We also collect and hold photographs and CCTV images.

Why we collect and use pupil information

The School’s personal data collection and use is essential in order for the School to fulfil its official functions and meet its legal requirements. We collect and use pupil personal information to:

- (a) support learning by pupils
- (b) monitor and report on progress of pupil attainment

- (c) provide appropriate pastoral care to pupils
- (d) assess the quality of our services
- (e) keep pupils safe and
- (f) meet the statutory duties placed upon us

Our collection and use of pupil personal information is lawful under the Data Protection Rules because (the “**Lawful Purposes**”):

- for the purposes of **(a)**, **(b)**, **(c)** and **(d)**, collecting the data is necessary to perform tasks that the School is required to perform as part of its statutory function (the “public task” legal basis)
- for the purposes of **(e)**, collecting the data is necessary to safeguard pupils (e.g., food allergies, or medical conditions) (the “vital interests” legal basis)
- for the purposes of **(f)**, collecting the data is necessary for the School to perform its duties under the following statutes (the “legal obligation” legal basis)
 - [Section 537A of the Education Act 1996](#)
 - [the Education Act 1996 s29\(3\)](#)
 - [the Education \(School Performance Information\)\(England\) Regulations 2007](#)
 - [regulations 5 and 8 School Information \(England\) Regulations 2008](#)
 - [the Education \(Pupil Registration\) \(England\) \(Amendment\) Regulations 2013](#)
- In addition, concerning any, the School’s legal basis for collecting special category data is set out in conditions 2(a), (b), (c) and (d) of [GDPR - Article 9](#).

The collection and use of pupil personal information for the purposes described above does not require the consent of the relevant pupil or the pupil’s parent or carer. That being said, we are asking for your consent as the parent or carer of the pupil or pupils for whom you are responsible because some of our activities may not clearly fall within any of the categories above. We explain these circumstances in further detail in the paragraph below captioned “Consent”.

When we share pupil personal information with others

We do not share information about our pupils with anyone unless the law and our policies require or allow us to do so or unless we have your consent to do so. When your personal information is shared with someone else, they must look after it and keep it safe. We describe below some of the ways we share pupil personal information with others.

We are required by law to share certain pupil personal information with Barnet, our local authority. Barnet may pass some information about our pupils to the DfE because the DfE is the part of the Government which is responsible for schools.

We are also required by law to share certain pupil personal information with the DfE, including as part of statutory data collections such as the school census and early years’ census. Some of this information is then stored in the National Pupil Database (NPD). The NPD is owned and managed by the 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.

To find out more about the pupil information we share with the DfE, 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](#).

The DfE 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 DfE has in place processes to ensure that the confidentiality of pupil personal information is maintained, and there are controls in place regarding access and use of the data. Decisions regarding 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 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 DfE's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>. For information about organisations to which the DfE has provided pupil information, and for which project, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>.

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

We will also share pupil personal information with the pupil's parents or main carer. Where appropriate, we will take family circumstances into account, in particular where a Court has decided what information a parent is allowed to have.

We will also share pupil personal information with several types of third party persons and service providers:

- disclosures to a pupil's new school if the pupil moves school or when the pupil leaves Sacks Morasha after year six to attend that new school, or in connection with pupils participating in "step-up" days in year five and / or transition in year six
- disclosures to the Finchley Jewish Primary School Trust (the "Trust"), which supports the School
- disclosures connected with School safeguarding and health and safety, including to the National Health Service (NHS), nurses, first aid suppliers, doctors surgeries, hospitals, ambulance services and Barnet Child and Adolescent Mental Health Service (CAMHS), the Barnet SEN team, the Barnet ASD team, speech and language teams, educational psychologists
- disclosures connected with the School's security, including to CST and the Disclosure and Barring Service (DBS)

- disclosures connected with the posting of photos in school hallways, classrooms and in school mailings and communications, and the posting of photos and videos from school activities on the school website
- disclosures connected with the activities of the School to the parent teachers association (PTA), class representatives, parents and club representatives
- disclosures connected with third party suppliers of academic and / or physical activities to pupils, including to Doodle Maths, Pobble, Class Dojo, JI Tap (from Jewish Interactive), Etgar, Boys' Town Jerusalem, and Norwood (workshops and clubs and interventions)
- disclosures to persons and service providers connected with the School's or the Trust's fundraising activities such as the annual dinner, including Uptown Events
- disclosures connected with the School providing schooling, recording, monitoring and reporting pupil data, including Target Tracker, Classroom Monitor, and Showbie
- disclosures connected with training, including Cambridge Education
- disclosures connected with the School's administration and communication, and its reporting obligations, including Parent Mail, Capita, RockIT, London Grid for Learning, HCSS, Cisco Meraki, Cisco AnyConnect, Toucan Technologies, Lightspeed Systems, Micro Librarian Systems / Junior Librarian, and TRIBE (United Synagogue)
- disclosures to OFSTED and Pikuach connected with the evaluation of the School

For a full list of the persons whom and the entities with which the School currently shares pupil personal information, please click [\[here\]](#).

The information disclosed to these people / services may, if necessary, include sensitive pupil personal information. Sensitive personal information means information, for example, about a pupil's health and any special educational needs or disabilities which that pupil might have.

Our disclosure of pupil personal information, including sensitive personal information, is lawful for the following reasons:

- The School 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 pupil information for the purposes of our function providing schooling, a function which is in the public interest
- There is a substantial public interest in disclosing pupil personal information because it is necessary to keep pupils safe from harm

The School normally does not transfer pupil personal information to a country which is outside the European Economic Area. Transfers by the School of personal information outside the European Economic Area would happen, for example, if one parent lives abroad or if the pupil moves to a new school abroad. If this happens we will take care that it is safe to transfer the relevant pupil personal information. We will look at whether that other country has good data protection laws for example. If we cannot be sure that it is safe then we will talk to you about it and make sure that you are happy for us to send that pupil personal information. As this is not something we normally do and we don't know which country we might need to send pupil personal information to, we cannot tell you more about it now but if we want to transfer pupil personal information to a different country then we will tell you whether or not we think it is safe and why we have decided that.

Please note that personal information which is shared by the School, or by a parent or pupil, with a

third party (via email, What's App or Parent Mail, for example, but also when using any third party provider of a computer application (each, an "app")), will be subject to that third party's privacy policy which may permit (1) the transfer and storage of such information outside the United Kingdom or the European Economic Area, (2) the sharing of such information with third parties which support that app provider's provision of its services, and (3) other sharing of information as set out in such app provider's policies. The School will generally share personal information with app providers which have confirmed their compliance with the Data Protection Rules. In order to confirm compliance, an app provider will generally need to store personal information pursuant to a data protection compliant protocol and share information only for a legal purpose such as fulfilling a legitimate interest or performing a legal obligation (which can be to satisfy obligations under a contract between the School and the app provider or between the app provider and those third parties which provide services to such app provider). It should also be noted that connecting to an app or sharing information on an app via Facebook or another communications platform will cause personal information to be shared with that platform and such information will be subject to that platform's privacy policy which may permit the transfer and storage of such information outside the European Economic Area and may permit the sharing of such information with other third parties.

Please note that pupils are able to create and store their own work on a shared "classwork" drive on the School's computer system. Should they do so, such work would become accessible by other pupils in the same class. Pupil exam and other similar academic results are collected and held separately, and as a result are only available to the senior leadership team and other teachers.

How long we keep pupil personal information

We only keep pupil personal information for as long as we need to or for as long as the law requires us to. Most of the pupil personal information we have will be in our pupil file. We usually keep these until the pupil's 25th birthday unless the pupil moves to another school in which case we send the pupil's file to the new school.

For more information regarding our Records Retention Policy, please click [\[here\]](#).

Rights

Parents and carers of pupils at the School have the following rights regarding pupil personal information. You can:

- ask us for a copy of the information we have about the pupil or pupils for whom you are responsible
- ask us to correct any pupil personal information we have if you think it is wrong
- ask us to erase pupil personal information (although we may have good reasons why we cannot do this)
- ask us to limit what we are doing with that pupil personal information
- object to what we are doing with that pupil personal information
- ask us to transfer pupil personal information to another organisation in a format that makes it easy for them to use.

If you want to receive a copy of the information about you that we hold, please contact the Data Protection Officer at the address provided above.

Complaints

You can also complain about what we do with pupil personal information. If you are not happy with our answer to your complaint then you can complain to the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Consent

We are asking today for consent to our use of pupil personal information because our use may not clearly fall into one of the Lawful Purposes described above. This is most likely to occur when we engage in activities which are not really part of our legal obligations as a school but which we undertake because we think they will benefit our pupils.

The law requires us to ask for pupil consent once the pupil is old enough to understand what we are asking. Accordingly, we are asking today for parent or carer consent regarding our pupils because all of them are in year six or in earlier years. Normally, even where pupils are asked to provide consent, we will involve parents and carers and we will try to take the preferences of parents and carers into account. However, by law, once pupil consent is required parent and carer consent will not be required.

Finally, we may change the pupil personal information we collect or the manner in which we use it. In such a circumstance, we will explain to you what we want to do and if we determine that we need to do so ask you for consent. In such a case, we will explain why we are asking for further consent and will explain the consequences if you do not give your consent.

If you give your consent, you may change your mind and withdraw your consent at any time now or in the future.

For all of the information about you which we currently collect and use, we ask that you consent to that collection and use. A minute is all it takes. Please click [\[here\]](#) to access the online consent form.

Thank you!