

<b>Policy Focus</b>	<b>Privacy Policy</b>				
<b>Policy Version</b>	<b>Version: 1.1</b>				
<b>Lead Policy Holder</b>	<b>Hannah Moon (Chief Operations Officer)</b>				
<b>Designated Director</b>	M. Escott		J. Johnson		R. Gasson <input checked="" type="checkbox"/>
<b>Policy Date</b>	November 2020				
<b>Directors Approved</b>	November 2020				
<b>Review Date</b>	November 2022 (Bi-Annual)				

### School Aim

Our Company (Life Chance Education Ltd) is committed to transforming the life chances of the young people and families that we work with. We support children who have suffered trauma, Adverse Childhood Experiences (ACEs), and exhibit Social, Emotional and Mental Health difficulties (SEMH). Our educational staff, multi-disciplinary team of therapists, and support team work together to create an environment that meets the holistic needs of children who have difficult, challenging or complex life stories.

By delivering the best features of a special school and alternative provision, coupled to innovative educational and therapeutic frameworks, we can help our students thrive. We believe that children don't **have** to be bound by the past but **can** build a brighter future for themselves, **if** they have the right support.

Our Mission is to ensure that we help every child or young person that we work with achieves their full potential, both academically and personally. As a school, we aspire to being outstanding, so that our students can become outstanding too – as exemplified in our school motto:

***'Being the Best We Can Be'***

Our Aims are to:

- Meet the previously unmet needs of young people and enable learning and employment.
- Provide positive interventions into barriers to learning and negative family or intergenerational life cycles.
- Contribute to community and social change.
- Reduce costs to society in terms of both social and economic benefits

To reach these aims, we will use concepts and best practice in learning, neuroscience, emotional well-being, child development and coaching.

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## Glossary of Acronyms

<b>ExP</b>	Executive Principal
<b>COO</b>	Chief Operations Officer
<b>LCE</b>	Life Chance Education
<b>CPD</b>	Continual Professional Development
<b>BoD</b>	Board of Directors
<b>HoS</b>	Head of School
<b>LA</b>	Local Authority

## 1. Statement of Intent for this Policy

This Policy is to provide all staff with the necessary information to enable them to meet their responsibilities and to ensure consistent and effective practice across all school sites. It demonstrates the school's commitment with regard to students, parents and other partners.

This Policy contributes to the school's Admin, Financial & Operations Portfolio (see section 3).

School for Inspiring Talents is a growing chain of independent therapeutic day schools in the South West. We are an all-through school that supports young people aged 5-16 who do not find it easy to fit into an existing mainstream educational provision. Working closely with families, it is our intention that every student achieves their full potential in both academic and personal development.

We are passionate about providing the appropriate support, care, nurture, and educational strategies that will allow these amazing young people to succeed in reaching for their dreams. Our aim is to help students achieve the skills and talents they need to flourish and have successful life chances

## 2. Statutory / Legislative Basis

GDPR Context

## 3. Links to Other Related Policies / Procedures

This policy sits within the Administration, Financial & Operations Portfolio of Policies which School for Inspiring Talents has adopted. It therefore relates to other policies in that themed grouping which include:

- Business Continuity Plan
- Fire & Emergency Policy & Procedures
- Premises Management Policy
- GDPR & Data Protection Policy
- Risk Register
- Feedback Policy
- Scheme of Delegation

## 4. Monitoring, Review & Evaluation (MRE): Compliance - Consistency – Impact

Monitoring, Review and Evaluation (MRE) of all aspects of our work as a school is undertaken to ensure that we are delivering on what we say we want to achieve with and for our students. In the interests of equity and high expectations for all our students, we are continuously checking for:

- Compliance and for Quality
- Implementation match with our Intent
- Consistency between staff and sites
- And to ensure value for money for our Referring Local Authorities.

Our school staff are part of our school culture of continuous improvement based on supervision, self-reflection, peer working, and CPD. Daily staff briefings and debriefings provide immediate feedback and strategies for even greater success next time round.

Our framework for MRE is achieved via 3 key approaches:

### Internally

- ↳ Our annual Self Evaluation Position Statement (SEPS) aligned with Ofsted Evaluation Areas and Grade Descriptors
- ↳ Learning Walks by HoS in own and other Phases/Sites
- ↳ Individual Student Assessment Framework and Trackers
- ↳ CEO & Executive Principal's Observations, Spot Sampling and Random Checks
- ↳ Monthly SLT Progress Reviews of the Operational School Improvement Plan (OSIP)
- ↳ Heads of School Monitoring
- ↳ Appraisal & Performance Management approaches.

- ✎ SchoolPod, Incident Logs Reviews and Spot Sampling, plus trend monitoring across the year
- ✎ Staff Briefings
- ✎ Student Voice Surveys
- ✎ Peer Reviews through Team Working
- ✎ CPD Evaluations

### Accountability MRE

- ✎ Our Board of Directors Link Portfolio Visits and Observations
- ✎ Director Monitoring of all Independent School Standards (ISS) Themes annually as part of a rolling programme
- ✎ Termly Directors Scrutiny of the CEO, Executive Principal and Chief Operations Officer Reports to the Board
- ✎ Termly H&S checks
- ✎ Directors Involvement in the cycle of Policy Review
- ✎ Financial and Curriculum Resource Monitoring

### Externally

- ✎ Referring LAs' Annual Health Checks and Audits
- ✎ Commissioned Reviews of aspects of practice – specialist and generic e.g. Behaviour, Health & Safety
- ✎ Feedback from submissions for Awards and Quality Standards e.g. TISS
- ✎ Parent / Carer Feedback e.g. via Class Dojo
- ✎ Ofsted Monitoring and Inspection Visits
- ✎ User Schools Feedback

## 5. Key Policy Content - Information / Guidance Relating to our Practice

This Privacy Policy Notice explains how we collect, store and use personal data about students.

We, Life Chance, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Jacqui Sloane, Premises & Compliance Officer:

Tell: 07399 164 067 Email: j.sloane@sfit.org.uk

### The Personal Data we collect and hold

We hold personal data about students, their parents or carers to support teaching and learning, to provide pastoral care and to assess how the school is performing. We may also receive data about students from other organisations including, but not limited to, other schools, local authorities, health care providers and the Department for Education.

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents, National Insurance number.
- Results of internal assessments
- Pupil and curricular records
- Characteristics, such as ethnic background, Early Years Pupil Premium, 30 hours eligibility or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs and videos

### We use this data to

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services (including monitoring staff performance)
- Comply with the law regarding data sharing

### Our legal basis for using this data

We collect and use personal data on the basis of performing a public task (educating children).

On some occasions we may ask for consent to process data when its use is optional.  
On those occasions consent can be withdrawn at any time.  
We will make this clear when we ask for consent and explain how consent can be withdrawn.

### **Collecting this information**

We collect / obtain data from students, parents, carers, teachers. Local Authorities, and other professionals where relevant (e.g. G.P, hospital, social workers etc.)

### **How we store this data**

We keep personal information about students while they are attending our school.  
We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations.  
We will only retain the data we collect for as long as is necessary. This would be to satisfy the purpose for which it has been collected in accordance with our data retention policy.  
Please contact us if you would like further details on this policy.

*The security of data and information is important to us. This is why we follow a range of security policies and procedures to control and safeguard access to and use of your personal information. This includes both physical and technical security and integrity of all data.*

### **Processing Images off site**

On evenings and weekends, staff sometimes work at home on Formative Assessment that contributes to Learning and Teaching, planning and documentation on the walls in school. This is made safe by storing images/files on encrypted laptops or memory sticks that are password protected.

### **Data Sharing**

We do not share any of this data with any other organisation without your permission, except where the law requires it. We are required to provide student data to central government through the Department for Education and the Education Funding Agency. Where it is necessary to protect a child, the school will also share data with the Local Authority Children's Social Services, medical professional and/or the Police.  
We do not transfer personal data to countries outside the European Economic Area.

### **Parents and students' rights regarding personal data**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them. This includes access to their child's educational record. This should be made in writing or by e-mail, (please see the contact s section below), and Life Chance will respond within a 15 school days timescale.

Parents/Carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 16), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

#### **If you make a subject access request, we will:**

- Give you a copy of the information in an intelligible form
- Give you a description of the data we hold
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances. If we cannot provide information to you, we will give you a description of the information we hold and the reason why it cannot be disclosed to you at the time of your request.

### **Other rights**

Individuals have rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing

- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations
- To exercise any of these rights, please contact our data protection officer.

### Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### Contact us

If you have any questions, concerns, or would like more information about anything mentioned in this privacy notice, please contact us:

Our Data Protection Officer is Jacqui Sloane, Premises & Compliance Officer, contact: 01626 244086

## 6. Implications for Stakeholders

<b>Board of Directors</b>	Directors will abide by the policy set out in section 5 and review every two years
<b>All Staff</b>	All staff should be made aware of the Privacy policy and ensure they understand their responsibilities
<b>Designated Specialist Staff</b>	<b>The COO (Chief Operations Officer)</b> as line Manager of the Administration/Facilities team, has a specific responsibility to ensure the Privacy policy has been completed and adhered to.
<b>Students</b>	Personal data belongs to the individual student
<b>Families/Carers</b>	For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request or have given their consent. Written consent has to be given in writing in relation to the following: <ul style="list-style-type: none"> <li>▪ Media within school on notice boards and in school magazines, brochures, newsletters, etc.</li> <li>▪ Outside of school by external agencies such as the school photographer, newspapers, campaigns</li> <li>▪ Online on our school website or social pages</li> </ul>
<b>Referring LAs</b>	Professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 is not a barrier to sharing information where the failure to do so would place a child at risk of harm
<b>Contractors</b>	Our suppliers or contractors need data to enable us to provide services to our staff and students – for example, IT companies. When doing this, we will: <ul style="list-style-type: none"> <li>▪ Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law</li> <li>▪ 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</li> <li>▪ 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</li> </ul>
<b>Visitors</b>	Visitors must sign in at reception and will be given an identification badge, which displays their name and occupation
<b>Agencies</b>	All agency staff refer to the Child Protection Policy and GDPR policy
<b>Schools</b>	N/A

## 7. Relevant Data Sets / Metrics

Staff Personnel Files – Confidential

## 8. Relevant Resources

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

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-data-protection-themes/>

<https://www.gov.uk/government/publications/data-handling-procedures-in-government>

## Appendices (Embedded / E.Links)

