



*Nancy Reuben Primary School*  
*Together We Grow*

**Nancy Reuben Primary School**

# **PRIVACY POLICY**

## **April 2018**

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## 1. Policy Statement - Privacy Policy

The privacy and security of all personal data held by us at the Nancy Reuben Primary School ('NRPS') is of the utmost importance to us.

This privacy policy sets out how NRPS (including Early Years and Key Stages 1 and 2) processes personal data (that is, information by which an individual can be identified) collected by us in the course of our lawful activities, and explains our obligations and your rights under the Data Protection Act 2018, the General Data Protection Regulation and any subsequent UK legislation and regulations that come into force from time to time ('Data Protection laws'). This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this. If you want to discuss any matter relating to how your data is used, please call us on 020 8202 5646, email us at [office@NRPS.co.uk](mailto:office@NRPS.co.uk) or write to the Data Protection Officer at NRPS, 48-51 Finchley Lane, London, London, NW4 1DJ. We may, in some cases, be required to ask that you write to us with your query.

References to the processing of information includes; the collection, use, storage and protection of data. NRPS is the 'data controller' for the purposes of this policy, and the policy extends to its staff, trustees, volunteers (including Governors and the PTA) and anyone else formally processing data on our behalf from time to time. Any personal data collected by NRPS will only be processed in accordance with this privacy policy.

NRPS is committed to protecting the privacy and security of the data of everyone we engage with. Children of any age have the same rights over the data processed about them, although their ability to understand and to exercise these rights may vary depending on their age and capacity. The rights of those under 16 are to be exercised by someone legally responsible for them. References in this policy to 'you' will therefore also include reference to children for whom you may be legally responsible. We therefore ask you to understand that our obligations are to every individual (or 'data subject') separately, and to work with us accordingly, including when requesting from the school details about other individuals.

NRPS cannot be responsible for personal data shared informally between parents or pupils even if that data originated from NRPS and was shared by NRPS in accordance with this policy. Parents and pupils are therefore reminded of the need only to hold and share data where necessary and using devices secured with suitable protection, such as a password or pin number.

Organisations are permitted to process data if they have a legal basis for doing so. NRPS processes data on the basis that:

- Express and informed consent has been given by or on behalf of the person whose data is being processed; and/or
- NRPS has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so they can enter into a contract or agreement; and/or
- NRPS has a legal obligation to process data.

Where NRPS is relying on solely consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which we are able to provide services to or interact with you in future.

NRPS may change this policy from time to time and any such changes will be published on our website. Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law.

This policy is effective from 10 April 2018.

## **2. What data do we collect?**

We collect the data necessary for NRPS to pursue its stated charitable objectives; providing Jewish and secular education to Jewish children through the operation of a school and pre-school facilities and in that connection, keeping pupils, parents and those legally responsible for pupils, staff, volunteers, stakeholders and supporters informed of our activities, marketing, fundraising and the effective running of NRPS through its professional staff, Governors and other volunteers. Data collected and processed may include, but not be limited to:

- Names and contact information of current or prospective pupils and family members, staff, volunteers and other stakeholders, such as telephone numbers, email and postal addresses and other data including, where appropriate, payment information and communication preferences
- Other relevant information relating to the above categories of people including, but not limited to; information about religious status, affiliation or observance, records of medical conditions necessary to ensure the safety of individuals under the care of NRPS, details of the payment of non-payment of school fees or other financial contributions and information about the financial circumstances of pupils' or prospective pupils' families where this has been made available to us in order to consider the appropriateness of Bursary assistance, employment records and those relating to safeguarding, such as Disclosure and Barring Service information or disclosures made to us which NRPS is obliged to process in confidence for the protection of a vulnerable person
- Photographs of pupils, family members, staff and volunteers or video footage from CCTV
- Such other information that is relevant and necessary for NRPS to carry out its activities, charitable purposes and legal obligations.

Such data may be collected, for example, when you enquire about or apply to NRPS for a place at the school, when you register a pupil at the school, when you provide information through our website or by other means, when you attend an event or donate to us, or when you provide us with personal data in some other way for whatever purpose.

## **3. What we do with the data we process**

NRPS uses the data collected to maintain accurate internal records of our engagement with pupils and their families, with staff, volunteers and others. These records facilitate our activities run in accordance with our charitable objects and legal obligations as a fee-paying school. Data may be processed and viewed, to the extent necessary and appropriate, by staff, trustees and certain volunteers in the course of NRPS's activities (all of whom work in accordance with this privacy policy) and will be retained only for as long as is reasonable, necessary and permissible in law.

We may use your personal information to send you information about NRPS and matters relating to NRPS's activities, services or campaigns which we think may be of interest to you. Photographs may be used on the school website or for marketing or promotional purposes, but you may notify us if you do not consent to such use.

In the case of a medical or other emergency, we may need to disclose personal or medical information about a pupil to emergency services and this may include the Haztola ambulance service.

We will only share data with trusted third-parties as stated above, or where necessary for us to communicate with you (such as mailing companies for postal communications or web-based platforms for email communications or newsletters) or as stated above, and only once we are satisfied that any such use of data will accord with our privacy policy.

We never sell your personal information and will not share it other than as stated above without your explicit consent, or unless under a legal obligation to do so or to prevent a crime, protect the safety of a vulnerable person or to assist in an investigation of such matters.

We are not permitted to share on request data relating to other pupils or their families with unauthorised persons, such as other parents, unless those whose data has been requested to be shared have agreed.

#### **4. Your rights in relation to your personal data**

You, as the data subject, may request deletion of your data at any time in writing, subject to any overriding legal requirement for its retention. However, NRPS may keep certain data on a suppression list to prevent further unwanted contact or data processing.

You may request details of personal information which we hold about you. Any such request must be submitted in writing and we reserve the right to verify the identity of the person making the request and their entitlement to the information before making any disclosure. A small fee may be payable if an information request is particularly onerous.

You may choose to restrict the collection or use of your personal information, but this may inhibit or limit the way in which NRPS is able to interact with you. You may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation on NRPS to retain data, such as the retention of Disclosure and Barring Service information, safeguarding records or tax related records for Her Majesty's Revenue and Customs.

You are responsible for the accuracy of data you have provided to NRPS. If you believe that any information we are holding on you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

You can obtain further information about Data Protection and privacy laws by visiting the Information Commissioner's website at: <https://ico.org.uk/for-the-public>.

#### **5. Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process. Persons processing data on behalf of NRPS do so in accordance with this policy and on the basis that NRPS is satisfied that they can and will adhere to our high standards for data protection and security.

The transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. You are responsible for keeping the password you use for accessing our website (if applicable) confidential; we will not ask you for your password, except if and when you need it to log in to our website.

#### **6. Web browsing and Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may also collect and store information about your browsing device, including, where available, your IP address, operating system and browser type. This is anonymous statistical data about your browsing activities and patterns, and does not contain any personal data.

## **7. Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.