

Well-Being Information					
Legal Processing Basis			Legal Obligation		
What Information ?	Probable Content	Why We Require It	Who Has Access To It ?	Where It Is Held ?	When Is It Disposed Of ?
Behaviour Records	Pupil Names	Well-being of Children	Class Teachers	Schools Vary : Purchased Software Is Used By Some To Record Incidents and Is Saved To A 'Cloud' Server OR A Paper Based System Is Used By Staff	Need To Be Kept Is Reviewed On An Annual Basis - If No Longer Relevant It Is Removed
	Dates	Identify Behaviour Trends	Senior Staff		
	Schools Action / Response	Identify Resource Needs	OFSTED		
	Reports of the Incident	Monitor Whole School Behaviour			

Legal Processing Basis			Legal Obligation		
What Information ?	Probable Content	Why We Require It	Who Has Access To It ?	Where It Is Held ?	When Is It Disposed Of ?
Safeguarding Records	Family Details	Legal Requirement	Class Teachers	An Online Software packages Is Used To Record All Incidents (Currently C-Pom's)	Held On File Throughout Child's Time At School
	Social Care Reports	Minimise the Risk of Harm : emotional, sexual, mental and physical	Senior Staff		Passed Onto New School When Moving
	Legal Documentation		Social Care in Local Authority		
	Incident / Event Reports	Identify Relevant Support	Voluntary Support Agencies or Charities		
	Referral Documentation		School Safeguarding Coordinator		
	Records of Involvement (e.g. counselling, tutors etc)		Governors (Anonymised Data Only)		

Other Information					
Legal Processing Basis			Consent		
Aspect	Nature of Material	Where It Appears	Why We Have It	Who It Can Be Accessed By	Limitations
Photographs	Class Photographs	Copies Sent To All Parents Annually	Record of Child's Time In School	Photographs Are Sent to All Parents	Where Photographs Are Used In the School, We Only Use a First Name
	Photographs Used On Displays Around the School	Display Boards Around the School	Parental Expectations	Displays Are Seen By All Those In The School Building (pupils, parents, visitors, staff etc.)	
	School Website	News Pages, Photo Gallery On Our Website	Celebrate Achievements	Website Is A Public 'Portal'	Children Considered Vulnerable or At Risk Will Not Normally Be Included (BUT This Depends On Individual Circumstances)
			Illustrate Something e.g. Learning Point or Activity		

Legal Processing Basis			Legitimate Interest		
Aspect	Nature of Material	Where It Appears	Why We Have It	Who It Can Be Accessed By	Limitations
Displays	Pupils Work Photographs Newspaper Articles Letters To Support Pupils Learning in the Classroom	Display Boards Around the School and Classrooms	Celebrate Achievements Illustrate Something e.g. Learning Point Support Learning	Displays Are Seen By All Those In The School Building (pupils, parents, visitors, staff etc.)	Staff Will Only Use Relevant Materials

Legal Processing Basis			Consent		
Aspect	Nature of Material	Where It Appears	Why We Have It	Who It Can Be Accessed By	Limitations
School Visits and Holidays	Names	Gathered By Teachers for Specific Visits	Health and Safety	School Staff On The Visits / Holiday	Information Will Only Be Shared With Those Who Need To 'Know' To Ensure A Safe, Secure and Happy Visit
	DOB		Respond to Incidents	Visit Organisers	
	Address	Some Passed To The Visit Organisers or Company	Notifying Parents / Guardians In A Timely Manner of Changes or Issues	Local Authority Visits Approval Systems	
	Telephone Contacts			Visit / Holiday Providers	
	Medical Information	LA Online Visit Approval Systems			
	Special Needs	Paper Based OR Electronic			



The Data Protection Officer

The UK GDPR which came into effect on the 1st January 2021 requires all schools to appoint a Data Protection Officer (DPO). Schools can decide to appoint this person internally, share one with another school(s) or (as in the case of your child's school) contract the role and responsibilities to a third party provider. Illuminate Education Services UK Ltd has been contracted to provide the DPO services for your child's school.

So, what are the key duties and the responsibilities of the DPO ? There are seven main duties. These are :

- To ensure **compliance** with the requirements of the GDPR
- To **advise** school staff, managers, trustees and governors in relation to the GDPR
- **Monitoring** compliance with the GDPR
- Assisting the school with carrying out any data protection **impact assessment and audits**
- **Co-operating with the supervisory authority** (Information Commissioner) and acting as a contact point for parents, inspectors and agencies
- Take a **risk-based approach to data protection** and advise on practice and policy
- Be the **lead contact** for all data protection queries with regard to potential complaints and breaches, ensuring that requests for information are properly handled

We have also produced a short leaflet entitled 'The Role of the Data Protection Officer' which is available on our website : www.theharmonytrust.org



Updates and Changes ...
This guide / information will be reviewed on a bi-annual basis. Until then, all changes, amendments or updates will be published on the Trust website : www.theharmonytrust.org

Subject Access Requests ...
If you wish to request access to any records we may hold, you should in the first instance contact your child's school. They will put in place the legal process for this to happen. A series of Frequently Asked Questions related to this is available on the website or upon request from the school.

Amendments ...
If you believe that the data we hold is inaccurate and needs amending then please request any changes in writing. This should be addressed to the school in the first instance.

Complaints ...
If you have any complaints or concerns related to how we manage your child's data, in the first instance you should (a) contact the school or (b) contact our Data Protection Officer. You also have a legal right to contact the Information Commissioner.

The Information Commissioner
Wycliffe House,
Water Lane,
Wilmslow
Cheshire SK9 5AF.
Or via their website : www.ico.org.uk

Data Protection Officer
Illuminate Education Services UK Ltd
E : CBellis01@theharmonytrust.org
T : 0845 8621967



An Introduction ...

On the 25th May 2018 the law changed and the new General Data Protection Regulation (GDPR) was introduced. In the UK, this became the Data Protection Act 2018. In January 2021, following the UK's departure from the EU, this was amended and became the UK GDPR. As an organisation that both controls and processes personal data we are required to let you know how we manage it.

In principle, with regards to data collection, we are required to carefully consider :

- what data we need from you
- why we need it
- what we will do with it
- where it will be stored
- who we may share it with, and why
- how will we dispose (get rid of) the data
- how long we will keep it for

As well as telling you all these things, we are also required to tell you how you can view the data, request changes or deletions and what we will do in the case of a data breach (loss). This leaflet has been produced to provide you with the key (essential) information in one place.

Principles ...

The UK GDPR states that the management of personal data should be undertaken with seven key principles in mind. These are :

Lawfulness, Fairness And Transparency :

... meaning that we must always comply with the law, treat the personal data of pupils with fairness and be transparent about what we do with it

Purpose Limitation :

... only use the data for the purposes we have told you about

Data Minimisation :

... only process data that we actually have a need for

Accuracy :

... make sure that all our data is accurate

Storage Limitation :

... only keep the data for as long as we need it and then securely destroy it

Integrity and Confidentiality :

... basically, keeping data safe and secure

Accountability :

... be accountable for what we do with

The UK GDPR states that alongside the seven principles, you have **8 key rights** in relation to our management of any data we hold. These rights are :

- the right to be **informed** about what we do with your data
- the right of **access** to your data
- the right to request that **inaccurate data is corrected**
- the right to **restrict** processing
- the right to data **portability**
- the right to **object**
- rights in relation to automated **decision making and profiling**
- the right to request the **erasure** of data
- ... and if there is any infringement of these rights, you have the **right to complain** and receive compensation

As a Trust we require some essential data about your children. This 'data' can be as simple and as routine as your address, a contact phone number or any medical conditions your child may have. Such information is not only legally required by the school, but also ensures that children and their families are well served by the school for routine matters.

In most cases, this data will be provided by you in written form but will then be 'processed' and entered onto the school's information management system (computer system). Be assured that our systems are :

- **password protected or encrypted**
- **restricted to those with a 'need to know'**
- **regularly backed up externally**
- **managed in accordance with the law and local guidance**

However, as a school we handle and use a much wider variety of data which may include our CCTV recordings, test data, referrals to social care and much more. We will always endeavour to tell you what we are doing with your data. However, on occasion we may be required to pass on data to other people / agencies. The circumstances in which we would likely do so, would include :

- **at the request of a court of law**
- **where we believe your child is at risk of harm**
- **we are legally required to do so**
- **at the request of police services in relation to a crime**

We will always TRY to notify you that we have passed on data to somebody else. However, it is likely that on occasion time-scales may limit our ability to do this.

Your Data ...

Here we will tell you what we do with all the personal data we process or control. We have put all this information in a set of simple tables, using a series of logical headings.

The UK GDPR outlines six possible bases for processing any data. These are :

Consent :

... where specific permission is given

Contract :

... where information is exchanged as part of a contractual agreement

Legal Obligation :

... because the law says we must

Vital Interest :

... where data is shared to protect someone's life

Public Task :

... in the public interest with a clear basis in law

Legitimate Interests :

... where there is a legitimate reason for sharing data, but not necessarily legally required

Personal Information					
Legal Processing Basis			Legal Obligation		
What Information ?	Probable Content	Why We Require It	Who Has Access To It ?	Where It Is Held ?	When Is It Disposed Of ?
Registration / Admissions Data	Name D.O.B. Address Telephone Medical Issues Parental Details	Legally Required To For Admission To School Well-Being of Your Child Communication	All Staff (Where Necessary)	Initially Completed On Paper Then Entered Onto School's Information Management System Paper Version is Shredded	Held On File Throughout Child's Time At School Passed Onto New School When Moving Computer Retains Copy of Records in 'Archive'

Academic Information					
Legal Processing Basis			Legal Obligation		
What Information ?	Probable Content	Why We Require It	Who Has Access To It ?	Where It Is Held ?	When Is It Disposed Of ?
External Testing (SAT's)	Foundation Stage	Legally Required To Provide Some Data To The Department for Education	All Staff (Where Necessary)	Data For the DfE Is Electronically Held	Held On File Throughout Child's Time At School
Internal Assessments & Tests	Key Stage 1	To Identify Strengths and Areas for Improvement, So Teaching Can Be Made More Personal		Teachers Own Test Results Are Held in Their Assessment Files (Paper)	Passed Onto New School When Moving
	Key Stage 2				Computer Retains Copy of Key Records in 'Archive' For 6 Years – But Is Only Used For Comparative Purposes
	Weekly Assessments (Tests)				
Special Educational Needs	Phonics Testing				
	Testing	Identify Possible Learning Difficulties and Plan Appropriate Interventions	Class Teachers	Held In A Variety of Forms	Held On File Throughout Child's Time At School
	Specific Assessments		Senior Staff (Headteacher or Principal)	Dependant on the Nature of the Information (Where Paper Records Are Used / Retained, These Are Held In Secure Locations With Limited Access.	Passed Onto New School When Moving
	Reports from Professionals (e.g. psychologists, speech and language)	To Apply For Additional Funding or Resources	Special Educational Needs Coordinator (SENCO)		School Retains A Copy Until the Child's 26th Birthday
	Statutory Assessments	To Identify Additional Needs	Local Authority		
		To Identify Appropriate Placements	Teaching Assistants		
		Regular Returns to the Dept for Education Or Local Authority	Administrative Staff		
		OFSTED Inspections			

Important Notes

(1) Data may also be viewed, shared with or accessed by members of the Harmony Trust Central Team as part of their roles (such as HR, Special Needs, Finance or Safeguarding) in leading and managing the Trust. (2) Most assessments and records are now held electronically using a variety of online systems (3) Data may also be used for internal research purposes so as to inform the impact of developments.