

Stepping Stones Privacy Statements

Policy Title	Privacy Statement for Stepping Stones School students and their families
First Published	2020
Last Date of Review	N/A
Next Review by Date	November 2021
Reviewed By	Emma Crabb, Director of Business and Operations
For publication on website	Yes

Like all schools, we collect a lot of data to help us run the school and to look after the interests of our school community – our pupils, staff, governors and volunteers. This privacy statement explains the what, how and why of the personal information we collect, what we do with it and your rights.

Please use the table of contents below to jump straight to the content that is of interest to you.

Contents

Introduction to our privacy statements	3
Your data protection rights	3
Requesting access to or queries on your Personal Information	4
Withdrawal of consent and the right to lodge a complaint	4
Last updated	4
Privacy Statement for our Students and their Families.....	5
Categories of Personal Information we collect and process about our Pupils?.....	5
Why we collect and process your personal information.....	5
Our lawful basis for collecting this information	6
Collecting and keeping for information.....	6
Who we share your information with	7
Sharing your information with Government.....	8
Privacy Statement for our Employees	9
Categories of Personal Information collect and process about our employees	9
Our lawful basis for collecting and processing your personal information.....	9
Collecting and keeping information	11
Privacy Statement for our Governors.....	13
Categories of Personal Data we collect and process about our Governors	13
Why we collect this Personal Data	13
Our lawful basis for collecting and processing your personal information.....	13
Collecting and keeping information	14
Privacy Statement for our Contracted Staff	15
Categories of Personal Information collect and process about contract staff.....	15
Our lawful basis for collecting and processing your personal information.....	15
Collecting and keeping information	16
Privacy Statement for our School Associates	18
Categories of Personal Information collect and process about our School Associates	18

Why we collect this Personal Information	18
Our lawful basis for collecting and processing your personal information.....	18
Privacy Statement for our Letting Organisations	20
Categories of Personal Information collect and process about our Lettings	20
Why we collect this Personal Information	20
Our lawful basis for collecting and processing your personal information.....	20

Introduction to our privacy statements

We are Stepping Stones School, an independent special needs school, and in terms of the data protection regulations, we are a Data Controller. That means we decide what information we need to collect about our community of individuals and we are responsible for taking care of it.

The processing of personal data is governed by the Data Protection Act 2018 (the Act) which includes the General Data Protection Regulations (the GDPR). Our Privacy Statements explain how we comply with the Act and the GDPR. In these regulations:

- “personal data” means any information relating to an identified or identifiable living individual. Special category data is personal data that needs more protection because it is sensitive and includes things such as health, biometric data, racial or ethnic origin, sex life and sexual orientation.
- “processing” of your personal data means pretty much anything that happens with personal data including collecting, recording, organising, structuring, storing, adapting or altering, retrieving, consultation and use. It includes both personal data on paper and in electronic format.
- “Lawful basis of processing”. We have to have a legal reason for processing your personal data and there are six reasons we can choose from. These are called the “lawful basis of processing” and are: having your consent, having a contract with you, in situations where we have a legal obligation to process your data, where we have a public task to perform, where it is in our legitimate interest and where it is in your vital interest that we process your personal information.

Your data protection rights

The Data Protection Act provides you with eight rights to help you manage your personal data. These are:

- Your right to be informed about the collection and use of your personal data. That’s what these privacy statements are about
- Your right of access to the personal data we hold about you. Please see the following section
- Your right to rectification - to have inaccurate personal data rectified, or completed if it is incomplete
- Your right to erasure – in some circumstances you can ask for your personal data to be deleted
- Your right to restrict processing – in some circumstances you can ask us to restrict how we process your personal data

- Your right to data portability – in some circumstances you can ask us to move the personal data you have given us to another organisation
- Your right to object – in some circumstances you can object to the processing of your personal data, especially in the case of direct marketing
- Your rights in relation to automated decision making and profiling – you can object to the use of these tools. However, we do not use tools for these purposes.

If you have a concern about the way we are collecting or using your personal data, please raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Requesting access to or queries on your Personal Information

Our Data Protection Officer is Emma Crabb. If you have any queries about your personal data or would like to know more, please contact her by email on dpo@steppingstones.org.uk or write to her at Data Protection Officer, Stepping Stones School, Undershaw, Portsmouth Rd, Hindhead, GU26 6AQ.

Under the Data Protection Act, you have the right to request access to information that we hold about you. To make a request for your personal information please send an email dpo@steppingstones.org.uk. It would help, but is not essential, if you can tell us the reason for your request and any particular pieces of your information that you are interested in.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw your consent at any time. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting our Data Protection Officer at dpo@steppingstones.org.uk or write to her at Data Protection Officer, Stepping Stones School, Undershaw, Portsmouth Rd, Hindhead, GU26 6AQ.

Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in November 2020.

Privacy Statement for our Students and their Families

In this privacy statement we refer to “you” and “your” as being one of our students, and “we” and “our” as being Stepping Stones School.

Categories of Personal Information we collect and process about our Pupils?

The information we collect is in the following categories:

- personal identifiers and contacts (such as name, date of birth, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- family Information (such as names of parents / carers, contact details, addresses, telephone numbers, email addresses and any details of additional carers who hold parental responsibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs, ranking and plans)
- medical and therapy (such as doctors’ information, therapy treatments, 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 how well you are progressing academically and your examination results)
- trips and activities (the school trips you go on and school clubs you join)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- accident and incident records.

Why we collect and process your personal information

The personal data we collect is essential for our school to fulfil its official functions and meet legal requirements. We collect and use your information, for the following purposes:

- a) to manage our admissions process
- b) to support your learning
- c) to monitor and report on your attainment progress
- d) to provide appropriate pastoral care
- e) to keep you safe (food allergies, or emergency contact details)
- f) for the protection and wellbeing of you and others at the school
- g) to support the safe and orderly running of the school
- h) to meet the statutory duties placed upon us by the Department for Education
- i) to assess the quality of our services.

Our lawful basis for collecting this information

Under the data protection regulations, we are required to have a lawful basis for processing your personal data. Much of the data we collect is mandated by various pieces of legislation, whilst other bits of data are collected because you or your parents / care giver have given us their permission. The main pieces of legislation that we have a legal obligation to comply with are:

- The Education Act (various years)
- The Childrens Act 2004
- Health and Safety at Work Act 1974
- The Education (Independent School Standards) Regulations 2014
- Education (Pupil Registration) (England) Regulations 2006
- The School Standards and Framework Act 1998
- The School Admissions Regulations 2012
- Children and Families Act 2014
- The Special Educational Needs and Disability Regulations 2014
- Supporting pupils with medical conditions at school – Statutory Guidance
- Special educational needs and disability code of practice: 0 to 25 years – Statutory Guidance
- The Data Protection Act 2018

Where we process your special category data (such as medical, health and special educational needs data) our lawful basis for processing is condition (g) Substantial public interest in Article 9 of the GDPR. Our purpose for processing this special category data is to enable us to access your teaching and learning needs, to help develop your social and life / work skills and to help you to identify, understand and regulate your emotions.

For us to process some categories of personal information we need the consent of you or your parent / caregiver. This information includes such things as permission to use your images, to attend off site activities, for treatment by a therapist or to keep in contact with you after you leave the school. We will ask you or your parents/ caregivers for consent as required during your time at the school. Parents/ caregivers may withdraw their consent at any time.

We use CCTV cameras around the school site for security purposes and for your protection and the protection of staff and visitors. CCTV footage may be referred to during disciplinary procedures (of staff or pupils) or to investigate other issues. Please see our CCTV policy for more details. Our lawful bases for processing CCTV images are that it is in our legitimate interest to do so.

Collecting and keeping for information

Collecting your information

We collect your personal data from several different sources including:

- You and your parents / caregivers on applications forms and other documents
- Your previous school
- Your teachers

- Your local authority
- Doctors and Therapists
- Learning applications

Storing your information

We process all your personal information on our IT systems some of which are located at the school and some are in “the cloud”. Some of your personal information is printed on paper. We keep these records in locked cabinets or in secure archive facilities. We have put in place technical and operational measures to keep your data secure. All our systems and providers comply with the GDPR.

How long we keep your information

Personal data relating to you and your families is stored in line with our Data Retention Schedule. As required by the regulations, personal data is only stored for as long as is necessary to complete the task for which it was originally collected. In most cases your records will travel with you to your next educational setting and we will destroy your records within 1 year of the leaving the school. However, there are much longer retention periods for Health and Safety, Safeguarding and certain SEN-D documents.

Please click here to see our [Data Retention Schedule](#).

Who we share your information with

We do not share information about you with anyone without consent unless the law and our policies allow us to do so.

We routinely share your and your family’s information with:

- your family and representatives - to meet our legal obligations, acting in the public interest regarding your education and to protect your vital interests should they arise
- schools/colleges that you attend after leaving us – to ensure your new school/college has up to date pupil records
- employers that you may work with to gain work experience – in order that you have a productive time with them
- your local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns or exclusions
- the Department for Education to meet our legal obligations and acting in the public interest regarding the education of young people
- educators and examining bodies to meet our obligations whilst acting in the public interest to ensure your continuing education as well as measuring outcomes
- our regulator, Ofsted, the organisation that supervises us, under whom we have a legal obligation and a public interest to provide a quality education for pupils
- suppliers and service providers – to enable them to provide the service we have engaged them for in line with our contractual obligations
- health authorities such as the NHS to protect your vital interests in respect of your physical and mental health

- security organisations in respect to our legal obligation under initiatives such as PREVENT
- health and social welfare organisations - under the public interest and our obligation to provide pastoral care
- professional advisers and consultants - acting under the public interest in providing educational support and consultancy
- police forces, courts, tribunals - fulfilling our legal obligations to prevent crime and comply with court orders etc
- charities and professional bodies - either through consent or under the public interest to provide relevant services such as awards and achievements

Sharing your information with Government

The Pupil Premium is extra funding we can claim from the government to help us improve the attainment of our disadvantaged pupils. To make a claim we need to submit your parents' names and national insurance numbers through a secure website to confirm their eligibility for funding. We will ask you parents for their consent before making an application.

The Department for Education does collect a significant amount of statistical information that does not identify you as a person and it receives information from a number of sources such as your local authority and awarding bodies.

The student data that the Department for Education collects:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy. (for example, how certain subject choices go on to affect education or earnings beyond school).

Privacy Statement for our Employees

This privacy statement applies to all salaried employees that work for Stepping Stones School on a fulltime or part-time basis. In addition, it applies to the period in which you may be applying for a position with us.

In this privacy statement we refer to “you” and “your” as being an employee or potential employee, and “we” and “our” as being Stepping Stones School.

Categories of Personal Information collect and process about our employees

The categories of employee personal information that we collect and process include:

- Personal information (such as name, contact details for you and your emergency contacts, employee or teacher number, bank account details, national insurance number, evidence of your right to work)
- Information from your application form and recruitment process, such as qualifications and employment history (and, where relevant, subjects taught)
- Information about and from your referees
- Special categories of data (including information about your ethnic origin and health conditions)
- Documents to support an Enhanced Disclosure and Barring Service application including a proof of identity document (such a copy of your passport or driving licence and a proof of address (such as a bank statement, council tax or utility bill))
- Contract information (such as start dates, hours worked, post, roles and salary information)
- Work attendance and absence information (such as your work pattern history, number of absences and reasons)
- Records of accidents and incidents
- Work performance and history (such as appraisal reports and correspondence, information about disciplinary or grievance matters, including any warnings issued to you)
- Data from our IT systems which records your use of the internet and work email account
- Recordings from our CCTV cameras

We collect information from you both prior to and during your employment from a range of sources, including your application form, correspondence with you, forms you complete prior to and during employment, from employment agencies, from interviews, appraisals and other meetings.

Our lawful basis for collecting and processing your personal information

Personal data processed for the performance of a contract or to comply with legal obligations

We process this information because the processing is necessary for us to enter into an employment (or other work-related) contract with you and for the subsequent performance of that contract, for example to ensure you are paid and receive your entitlements to benefits, such as annual leave. “Performance of a contract” is also our lawful basis for processing information during the pre-contract phase of recruitment. We also need to process this information to ensure that we are complying with our legal obligations, such as ensuring that we deduct tax correctly, conduct criminal record checks, maintain a record of accidents and to defend legal claims.

Equal opportunities monitoring

We process special category data, such as information about your ethnic origin or health, as part of our equal opportunities monitoring process, because the school has a legitimate interest in processing this data. Where we process information for the purposes of equal opportunities monitoring, this information is collected only with the explicit consent of employees. Consent may be withdrawn by an employee at any time. We process data in this category in reliance on the condition that processing is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment.

Other processing of special category data and criminal records data

We also process special category data, such as information about health, racial or ethnic origin, to comply with our legal obligations (such as conducting 'right to work' checks, ascertaining fitness to work, meeting our obligations under health and safety legislation and the Equality Act 2010) or because processing is necessary for the performance of the contract (such as administering sick pay).

We process criminal records data to comply with our legal obligations to ensure the suitability of employees and other workers to work with children and young people.

We process data in this category in reliance on the condition that processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law in connection with employment.

Personal data processed for the purposes of the legitimate interests of the School

We use other employee data to manage the day-to-day operation of the school, where processing is necessary for the purposes of our legitimate interests. In relying on legitimate interests, we first consider the necessity of processing the data when balanced against the interests, rights and freedoms of the individual. These legitimate interests include to:

- keep records of employee performance and work history, including training and appraisal records, to ensure acceptable standards of conduct are maintained and to manage training and career progression
- manage absence effectively
- manage day-to-day HR administration
- enable the development of a comprehensive picture of the workforce and how it is deployed
- record images of people at the school on CCTV for the purpose of maintaining a safe and secure environment for pupils, staff and visitors, protecting the school buildings and assets, assisting in reducing the fear of crime and for the protection of private property.

Personal data processed with your Consent

There are situations in which we will ask for your consent to process your personal information. In these situations, you are perfectly free to decline to provide your consent, and to withdraw it at any time. An

example of when we may ask for consent is when we would like to use images and information about you to promote the activities of the school in a newsletter.

Collecting and keeping 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 data protection legislation, we will inform you whether you are required to provide certain school information to us or if you have a choice in this.

Storing this information

We process all your personal information on our IT systems some of which are located at the school and some are in “the cloud”. Some of your personal information is printed on paper. We keep these records in locked cabinets or in secure archive facilities. We have put in place technical and operational measures to keep your data secure. All our systems and providers comply with the GDPR.

How long do we keep your information?

Your information is stored in accordance with our data retention schedule, the full version of which is available by [clicking here](#).

In summary we retain most records relating to your employment on your personnel file for six years after employment has ended.

If you are an unsuccessful applicant we will delete your personal information within 6 months of filling the role.

Evidence of your right to work in the UK is retained on your personnel file for two years after employment has ended, in accordance with Home Office recommendations.

Allegations of a child protection nature remain on file until normal retirement age, or 10 years from the date of the allegation, if longer, in accordance with statutory guidance.

Identity documents obtained for the purposes of undertaking a Disclosure and Barring Service check are only retained until the results of the check have been received.

Who we share this information with and why?

Your information will be shared with school staff with an HR or recruitment responsibility and managers within your area of work or department.

We do not share information about our staff with anyone without consent unless the law and our policies allow us to do so.

We will share your data with certain third parties to fulfil legal requirements, obtain or provide necessary information or because the third-party processes data on our behalf. These third parties include:

Your previous employers and referees in order to undertake pre-employment checks

- The Disclosure and Barring Service in order to undertake pre-employment checks and follow-up checks during employment
- Suppliers and consultants that provide us with a service, such as occupational health, HR, IT or legal services
- Trade unions or any other representative acting on your behalf
- The local authority, when necessary to comply with statutory guidance regarding the safeguarding of children and young people
- Ofsted / Independent Schools Inspectorate
- Our accountant, HMRC and pension providers
- Health professionals in the case of accident, injury or illness.

When we appoint third parties to process data on our behalf, the third party is also required to process the data lawfully and fairly and in a manner that ensures appropriate security of the data, using appropriate technical or organisational measures to protect against unauthorised or unlawful processing and accidental loss.

Privacy Statement for our Governors

This privacy statement applies to all governors of Stepping Stones School.

In this privacy statement we refer to “you” and “your” as being a school governor, and “we” and “our” as being Stepping Stones School.

Categories of Personal Data we collect and process about our Governors

The categories of governor personal information that we collect and process include:

- Personal details (such as name, contact details for you, evidence of your identity, register of interests)
- Information from your application form and recruitment process, such as references, qualifications and employment history
- Documents to support an Enhanced Disclosure and Barring Service application including a proof of identity document (such a copy of your passport or driving licence and a proof of address (such as a bank statement, council tax or utility bill)
- Governance details (such as role, start and end dates)
- Attendance record at governor meetings
- Information recorded in governance meetings and related documents
- Data from our IT systems which records your use of the internet and work email account
- Recordings from our CCTV cameras

Why we collect this Personal Data

The personal data collected is essential in order for the school to fulfil its official functions and meet legal requirements.

We collect and use governance information to meet the statutory duties placed upon us.

We keep records of CCTV images for the purpose of maintaining a safe and secure environment for pupils, staff and visitors, protecting the school buildings and assets, assisting in reducing the fear of crime and for the protection of private property.

Our lawful basis for collecting and processing your personal information

Our lawful basis for processing the Personal Information of our governors is primarily Legal Obligation. In the context of processing governors personal data we are required to comply with:

- The Education (Independent School Standards) Regulations 2014
- The Companies Act 2016
- The Charities Act 2011

We may collect images of you on our CCTV cameras when you visit the school as it is in our legitimate interest to do so.

There are situations in which we will ask for your consent to process your personal information. In these situations, you are perfectly free to decline to provide your consent, and to withdraw it at any time. An example of when we may ask for consent is when we would like to use images and information about you to promote the activities of the school in a newsletter.

Collecting and keeping information

We collect information from you both prior to and during your role as a governor from a range of sources, including your application form, correspondence with you, forms you complete prior to and during your time as a governor, from interviews, reference checks and other meetings.

Governance data is essential for the school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

Your personal information may also be included in the minutes of Governance meetings and other documents related to governance of the school.

Storing your Personal Information

We hold your personal information securely in electronic records within our local server, in other IT systems, including email, on our Clerk's PC and on paper in locked cabinets.

How long do we keep your information?

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule please follow this [link](#).

However, in summary the personal information of unsuccessful applications for the role of governor are held for a period of six months from the date of the election or for sitting Governors, the end of their term plus one year.

Who we share your personal information with and why

We share this information with:

- The local authorities we work with (where applicable)
- The Department for Education (where applicable)
- Ofsted
- The school's bank
- Companies House
- The Charities Commission

Certain personal details about you and your attendance at governor meetings will be posted on the school's website.

Privacy Statement for our Contracted Staff

This privacy statement applies to contracted staff that work for Stepping Stones School on a contractual basis such as therapists, IT Support and HR advisors. In addition, it applies to the period in which you may be applying for a position with us (pre-contract period). There may be differences in the personal information we process depending on whether you are an individual contractor or work for an organisation we contract with.

In this privacy statement we refer to “you” and “your” as being a contracted member of staff or potential contracted member of staff, and “we” and “our” as being Stepping Stones School.

Categories of Personal Information collect and process about contract staff

The categories of contracted staff personal information that we collect and process include:

- Personal information (such as name, contact details for you and your emergency contacts, bank account details, national insurance number, evidence of your right to work)
- Information from your application form and recruitment process, such as qualifications and employment history (and, where relevant, subjects taught)
- Information about and from your referees
- Special categories of data (including information about your ethnic origin and health conditions)
- Documents to support an Enhanced Disclosure and Barring Service application including a proof of identity document (such a copy of your passport or driving licence and a proof of address (such as a bank statement, council tax or utility bill)
- Contract information (such as start dates, hours worked, post, roles and payment information)
- Records of accidents and incidents
- Data from our IT systems which records your use of the internet and work email account
- Recordings from our CCTV cameras

We collect information from you both prior to and during your employment from a range of sources, including your application form, correspondence with you, forms you complete prior to and during employment, from employment agencies, from interviews, appraisals and other meetings.

Our lawful basis for collecting and processing your personal information

Personal data processed for the performance of a contract or to comply with legal obligations

We process this information because the processing is necessary for us to enter into an employment (or other work-related) contract with you and for the subsequent performance of that contract, for example to ensure you are paid. “Performance of a contract” is also our lawful basis for processing information during the pre-contract phase of recruitment. We also need to process this information to ensure that we are complying with our legal obligations, such as ensuring that we deduct tax correctly, conduct criminal record checks, maintain a record of accidents and to defend legal claims.

Other processing of special category data and criminal records data

We also process special category data, such as information about health, racial or ethnic origin, to comply with our legal obligations (such as conducting 'right to work' checks, ascertaining fitness to work, meeting our obligations under health and safety legislation and the Equality Act 2010) or because processing is necessary for the performance of the contract.

We process criminal records data to comply with our legal obligations to ensure the suitability of staff and other workers to work with children and young people.

We process data in this category in reliance on the condition that processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law in connection with employment.

Personal data processed for the purposes of the legitimate interests of the School

We use other staff data to manage the day-to-day operation of the school, where processing is necessary for the purposes of our legitimate interests. In relying on legitimate interests, we first consider the necessity of processing the data when balanced against the interests, rights and freedoms of the individual. These legitimate interests include to:

- keep records of contracted staff performance and work history
- manage day-to-day administration
- record images of people at the school on CCTV for the purpose of maintaining a safe and secure environment for pupils, staff and visitors, protecting the school buildings and assets, assisting in reducing the fear of crime and for the protection of private property.

Personal data processed with your Consent

There are situations in which we will ask for your consent to process your personal information. In these situations, you are perfectly free to decline to provide your consent, and to withdraw it at any time.

Examples of when we may ask for consent are:

- When we would like to use images and information about you to promote the activities of the school in a newsletter
- When a contracted staff member wishes to use our WIFI network

Collecting and keeping 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 data protection legislation, we will inform you whether you are required to provide certain school information to us or if you have a choice in this.

Storing this information

We process all your personal information on our IT systems some of which are located at the school and some are in "the cloud". Some of your personal information is printed on paper. We keep these records in

locked cabinets or in secure archive facilities. We have put in place technical and operational measures to keep your data secure. All our systems and providers comply with the GDPR.

How long do we keep your information?

Your information is stored in accordance with our data retention schedule, the full version of which is available by [clicking here](#).

In summary we retain most records relating to your engagement for six years following your engagement with the school. If you are a contracted therapist we may keep your records for up to 25 years in case of a follow up enquiry or investigation regarding one of your student clients.

If you are an unsuccessful applicant we will delete your personal information within 6 months of filling the role.

Evidence of your right to work in the UK is retained on your personnel file for two years after employment has ended, in accordance with Home Office recommendations.

Allegations of a child protection nature remain on file until normal retirement age, or 10 years from the date of the allegation, if longer, in accordance with statutory guidance.

Identity documents obtained for the purposes of undertaking a Disclosure and Barring Service check are only retained until the results of the check have been received.

Who we share this information with and why?

Your information will be shared with school staff with an HR or recruitment responsibility and managers within your area of work or department.

We do not share information about our staff with anyone without consent unless the law and our policies allow us to do so.

We will share your data with certain third parties to fulfil legal requirements, obtain or provide necessary information or because the third party processes data on our behalf. These third parties include:

- Your previous employers and referees in order to undertake pre-employment checks
- The Disclosure and Barring Service in order to undertake pre-employment checks and follow-up checks during employment
- Suppliers and consultants that provide us with a service, such as occupational health, HR or legal services
- Trade unions or any other representative acting on your behalf
- The local authority, when necessary to comply with statutory guidance regarding the safeguarding of children and young people
- Ofsted / Independent Schools Inspectorate
- Our accountant and HMRC
- Health professionals in the case of accident, injury or illness.

When we appoint third parties to process data on our behalf, the third party is also required to process the data lawfully and fairly and in a manner that ensures appropriate security of the data, using appropriate technical or organisational measures to protect against unauthorised or unlawful processing and accidental loss.

Privacy Statement for our School Associates

By school associates we mean non-paid individuals such as volunteers and visitors from recipient schools. This privacy statement explains the personal information we need to collect from you.

In this privacy statement we refer to “you” and “your” as being a school associate, and “we” and “our” as being Stepping Stones School.

Categories of Personal Information collect and process about our School Associates

The categories of personal information we collect and process include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Engagement information (references and other information collected as part of the application process).
- Documents to support an Enhanced Disclosure and Barring Service application including a proof of identity document (such a copy of your passport or driving licence and a proof of address (such as a bank statement, council tax or utility bill)
- Emergency contact information
- Information about your health, including any medical condition
- Images and videos of you for use in publicity information
- Recordings from our CCTV cameras

Why we collect this Personal Information

We process personal information about you to:

- Ensure the safeguarding of the children you may be working with
- Contact you about your volunteering and involvement with the school
- Provide you with any necessary training
- Contact someone in case of emergency
- Comply with our health & safety obligations and enable any reasonable adjustments to be made
- Send you newsletters about the school and its activities
- Include you in stories and articles about the work our volunteers do with the school

Our lawful basis for collecting and processing your personal information

We have to have a good (and lawful reason) for all the personal information we process that is about and relates to you. Our lawful bases of processing the personal information of our volunteers are:

- A legal obligation to conduct reference and DBS checks for all people that work at the school and to ensure we can make reasonable adjustments for those with disabilities
- Consent. Some personal information we will only process with your consent – such as the use of images or videos of you or recording details of your emergency contacts, sending you our newsletter or to use our WiFi network. In these situations, we will ask for your consent on a case-by-case basis.
- Legitimate Interest. It is in our legitimate interest to record images of people at the school on CCTV for the purpose of maintaining a safe and secure environment for pupils, staff and visitors, protecting the school buildings and assets, assisting in reducing the fear of crime and for the protection of private property.

Collecting and keeping information

We collect personal information about our associates through the application and recruitment process (where applicable) and directly from you. We may sometimes collect additional information from third parties, including your referees.

We may also collect personal information (i.e., images of you) from our CCTV cameras

Storing your Personal Information

We process all your personal information on our IT systems some of which are located at the school and some are in “the cloud. We have put in place technical and operational measures to keep your data secure. All our systems and providers comply with the GDPR.

How long do we keep your information?

We keep your personal records on file for a period of 6 years following your engagement with the school.

Who we share this information with and why?

We do not share your information with external organisations except emergency services if required.

Privacy Statement for our Letting Organisations

By letting organisations, we mean those that hire our facilities, such as our swimming pool and halls. This privacy statement explains the personal information we need to collect from you as individuals as opposed to the organisation you represent.

In this privacy statement we refer to “you” and “your” as being a representative of an organisation that hires our facilities from time to time, and “we” and “our” as being Stepping Stones School.

Categories of Personal Information collect and process about our Lettings

The categories of personal information we collect and process include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Reference checking information
- Documents to support an Enhanced Disclosure and Barring Service application including a proof of identity document (such a copy of your passport or driving licence and a proof of address (such as a bank statement, council tax or utility bill))
- Use of our guest WiFi network
- Recordings from our CCTV cameras

Why we collect this Personal Information

We process personal information about you to:

- Administer and manage the bookings of the school facilities
- To ensure compliance with Safeguarding Statutory Regulations
- To ensure compliance with Health and Safety Statutory Requirements
- To ensure compliance with Insurance Regulations
- To process financial transactions necessary for the hire of our facilities

Our lawful basis for collecting and processing your personal information

Our lawful bases of processing the personal information of letting representatives are:

- Legal obligation to comply with health, safety and safeguarding requirements
- Performance of a contract with you and legitimate interests (for running our lettings business, to recover debts due to us, to keep our records updated)
- Your consent where applicable – such as for use of our guest WiFi network

Collecting and keeping information

We collect personal information about our letting representatives through the application and screening process, directly from you. We may sometimes collect additional information from third parties, including your referees.

We may also collect personal information (i.e. images of you) from our CCTV cameras

Storing your Personal Information

We process all your personal information on our IT systems some of which are located at the school and some are in “the cloud. We have put in place technical and operational measures to keep your data secure. All our systems and providers comply with the GDPR.

How long do we keep your information?

We keep your personal records on file for a period of 6 years following your engagement with the school.

Who we share this information with and why?

We do not share your information with external organisations except emergency services and law enforcement agencies if required.