



Imaginarium Privacy Policy

Imaginarium is part of the Education Health & Wellbeing CIC. This privacy policy will explain how our organisation uses the personal data we collect from you. It is intended for parents, children, staff, prospective employees and volunteers.

Topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Who do we share your information with?
- What are your data protection rights?
- How to withdraw consent and lodge complaints
- Changes to our privacy policy
- How to contact us

What data do we collect?

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Bank details and other financial information, e.g. to pay salaries for members of staff;
- Past and present children's attendance records (including information about any special needs),
- Assessment information such as the child's reading book band.
- Where appropriate, information about individuals' health, such as details of any medical conditions or allergies, dietary requirements, medication requirements and contact details for their next of kin and a secondary contact;
- Days and times when the children attend the childcare;
- Images of pupils (and occasionally other individuals) engaging in school activities
- Information received during the recruitment of staff including references, qualifications and employment history;
- Correspondence with pupils, parents, staff contractors and third parties;
- Staff employment records – e.g. training, development review.

How do we collect your data?

Generally, we receive personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as verbal, email or written assessments). However, in some cases personal data may be supplied by third parties (for example, from another member of the school community, another school, another employer or other professionals or authorities working with that individual).

How will we use your data?

In order to carry out its ordinary duties to members of staff, pupils, parents, contractors and some third parties we may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation. Some of this activity we will need to carry out in order to fulfil our legal rights, duties or obligations – including those under a contract with staff, or parents of its pupils. Other uses of personal data will be made in accordance with our legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data.

We expect that the following uses may fall within that category of our (or our community's) "legitimate interests":

To provide effective communication with all parties referenced in this policy;

- To facilitate effective communication within the school via handbooks and shared information management systems;
- To maintain relationships with alumni and the school community, including direct marketing or fundraising activity;
- To keep pupils safe.
- To support pupil learning.
- To provide appropriate pastoral care.
- To assess the quality of our services.

In addition, we may need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where

it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes, or to pastoral staff and organisers of school trips;

- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare or pension plans or union membership;
- To run any of its systems that operate on biometric data, such as for security, time and attendance or;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

How do we store your data?

We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. The files will be kept securely (either electronically or in hard copy). However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. The independent inquiry into child sexual abuse (IICSA) has emphasised the need to keep some types of pupil records indefinitely.

If you have any specific queries about how this policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Chief Operating Officer. However, please bear in mind that the school may have lawful and necessary reasons to hold on to some data.

For more information about how we keep your information safe, please see our Data and Cyber-security Breach Prevention and Management Plan,

We ensure:

- All information held is justifiable, by reference to its purpose;
- Transparency and accountability for what is held;
- Subject access requests can be accommodated properly;
- Data can be amended, deleted or transferred promptly upon any justified request;
- Access is appropriate to the data held (particularly any sensitive data).

Who do we share your information with?

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

We are required to tell Ofsted the ages of the children in our care.

What are your data protection rights?

We would like to make sure you are fully aware of all of your data protection rights. Every party is entitled to the following:

In certain circumstances, you have the following data protection rights:

1. The right to access, update or delete the information we have on you.
2. The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
3. The right to object. You have the right to object to our processing of your Personal Data.
4. The right of restriction. You have the right to request that we restrict the processing of your personal information.
5. The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
6. The right to withdraw consent. You also have the right to withdraw your consent at any time where we relied on your consent to process your personal information.

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the [DPO, James Gardiner](#), at james@ehw-cic.co.uk.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on our website. This privacy policy was last updated October 2022.

How to contact us

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: imaginariumlewes@gmail.com

Call us: 07740474477

Declaration

I, _____, declare that I understand:

- The categories of my personal information Imaginarium collects and uses.
- Imaginarium has a lawful basis for collecting and using my personal information.
- Imaginarium may share my information with the DfE, LA and other stated organisations.
- Imaginarium does not share information about me with anyone without my consent, unless the law and our policies allow them to do so.
- My information is retained in line with Imaginarium’s Records Management Policy.
- My rights to the processing of my personal information.

Name: _____

Signature: _____

Date: _____