



LANTERN OF KNOWLEDGE  
EDUCATIONAL INSTITUTE

# LoK Privacy Notice

February 15

# 2021

Revised by S. Ahmed

		Next Review Date	30/11/2023
<b>Approved By</b>	<b>Position</b>	<b>Date</b>	<b>Sign</b>
Shakil Ahmed	Headteacher	18/02/2021	
Mol. Farooq Suleman	Governor	18/02/2021	

# Lantern of Knowledge School

## 1. Who we are

For the purposes of this policy Lantern of Knowledge School ("The School", "we") refers to any organisation which is part of the Lantern of Knowledge School Community and includes Lantern of Knowledge Educational Institute, Lantern Relief, Jamia Siraj ul Uloom and Lantern of Knowledge Educational Trust.

This notice is designed to conform to the General Data Protection Regulation (EU 2016/679) and the UK General Data Protection Act 2018. We will refer to this as Data Protection Law.

## 2. Who to contact

The School secretary is our person responsible for data protection. He is part of a team of senior managers who oversee how we process your data. If you have a question, issue or wish to change the way we currently use your data please contact the Lantern of Knowledge School GDPR team:

GDPR Team, Lantern of Knowledge School, 30-36 Lindley Road, London E10 6QT,  
info@lanternofknowledge.org.uk, 02085395183.

## 3. What we do with your data

This privacy notice is intended to provide information about how we will use (or "process") personal data about individuals including: its current, former and prospective staff; its current, past and prospective pupils; their parents, carers or guardians (referred to in this document as "parents"); suppliers of goods and services to the School; and any other members of the Lantern of Knowledge Community.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. All members of the Lantern of Knowledge School Community are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This **Privacy Notice** applies alongside any other information we may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice** applies in addition to our other relevant terms, conditions and policies. These include but are not limited to:

- any contract between the School and its staff or the parents of pupils;
- the School's policy on taking, storing and using images of children;
- the School's CCTV (where used);
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use policy.

Anyone who works for, or acts on behalf of, Lantern of Knowledge School (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice and all relevant school policies.

#### 4. Why the School needs to process personal data

The lawful basis for data processing as set out in data protection law include the following:

- Consent
- Contract
- Legal obligation
- Vital interest
- Public Task
- Legitimate interest

We will always seek to process data only when necessary. We will be targeted in and proportionate in our processing to achieve a purpose.

In order to carry out our ordinary duties to members of the Lantern of Knowledge School Community (including staff, pupils, former pupils and parents) we may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of our daily operation.

We will need to carry out some of this activity in order to fulfil our legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

All six basis are equally valid for processing data but we are obliged to inform you of the basis under which we process your data.

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

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests (Building profiles of supporters and targeting communications);
- For the purposes of due diligence, and to confirm the identity of prospective parents/carers or children who may need financial assistance from the school or from other external organisations or individuals who would be willing to contribute.
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils and staff;
- To enable pupils to take part in national or other assessments, and to publish the results

- of public examinations or other achievements of pupils of the School;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT: acceptable use policy;
- To make use of photographic images of pupils, staff and parents in school publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of individuals;
- To enable payments to be made where appropriate to individual service providers.
- For security purposes, including CCTV in accordance with the School's CCTV policy; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;

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 us 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 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 religious beliefs;
- In connection with employment of its staff and volunteers, for example DBS checks, welfare or pension plans;
- To provide suitable food and drink at School or an event while being respectful of religious, cultural and or medical requirements, including allergies.
- To run any of its systems that operate on biometric data, such as for security and other forms of pupil identification; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with our legal obligations and duties of care.

## 5. Types of personal data we process

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information, e.g. about parents who pay fees to the School;
- past, present and prospective pupils' academic, disciplinary, admissions, assessment and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- records of gifts/donations made and any gift aid declarations
- references given or received by the School about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and

- images of pupils, staff and parents (and occasionally other individuals) engaging in school activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images);

## **6. Where we collect information about you from**

We collect information in the following ways:

### **When you give it to us DIRECTLY**

You may give us your information as a prospective, current or former pupil, or member of staff, or parent, or in order to receive information from the School, sign up for one of our events, make a donation, purchase our products or communicate with us. Sometimes when you support us, your information is collected by an organisation working for us (e.g. an online payment company), but we are responsible for your data at all times.

### **When you give it to us INDIRECTLY**

Your information may be shared with us by independent organisations for example fundraising sites like Just Giving or Virgin Money Giving. These independent third parties will only do so when you have indicated that you wish to share your details with the School and with your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

### **When you give permission to OTHER ORGANISATIONS to share or it is available publicly**

We may receive and record information from organisations such as Colleges or individual universities that we use to better understand our former pupils' university choices and to inform careers and university advice given to current pupils.

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our supporters to improve our fundraising methods, products and services.

The information we get from other organisations may depend on your privacy settings on these sites or the responses you give, so you should regularly check them. This information comes from the following sources:

### **Third party organisations**

You may have provided permission for a company or other organisation to share your data with third parties, including charities. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.

### **Social Media**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services. By joining a group in social media, you consent to allowing us to contact you through that platform.

### **Information available publicly**

This may include information found in places such as Companies House and information that has been published in articles/newspapers

### **When we collect it as you use our websites**

Like most websites, we use "cookies" to help us make our sites – and the way you use them –

better. Cookies mean that a website will remember you. They are small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you are using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you are using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

## **CCTV**

Some parts of our school maybe monitored by CCTV. These areas are clearly marked by suitable signage. We use any video and audio recorded to protect our pupils, staff and visitors while they are on site, to deter crime, and to help maintain good order within the School grounds. We retain this information for a period of up to thirty days. Access to CCTV footage is controlled. CCTV footage may be passed onto the Police or other relevant authorities.

## **7. Who helps us process your data**

Occasionally, we will need to share personal information relating to our community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies ( e.g. The Independent Schools Inspectorate, Ofsted, The Charity Commission or the Information Commissioner).
- The Lantern of Knowledge Trust
- Jamia Siraj ul Uloom

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the School medical team and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

However, a certain amount of any Special Educational Needs (SEN) pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the Local Authority Designated Officer (LADO) or police. For further information about this, please view the School's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems providers, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only processed in accordance with our specific directions.



## **8. How we store your data**

We store your data securely on our network and on remotely held secure servers within the EEA. We regularly back up our data to a secure remote server.

Data collected using a third party application will be stored on the third party's server. We only use third parties which comply with all relevant GDPR information.

Physical data is stored securely in offices at School. Access to physical and digitally held data is restricted to appropriate school staff and volunteers.

## **9. How long we keep personal 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. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to seven years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

Specific details of a pupils time at school are stored indefinitely for alumni.

If you have any specific queries about how our retention 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 GDPR team [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk). However, please bear in mind that we will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of that fact in order to fulfil your wishes (called a "suppression record").

## **10. Keeping in touch and supporting the School**

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community such as the alumni.
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School;
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the School's fundraising potential, improve the School's careers programme and improve community reach.
- Should you wish to limit or object to any such use, or would like further information about them, please contact the GDPR Team in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, we are nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

## 11. Your Rights

### Rights of access

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the GDPR Team.

We will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits (which is one month in the case of requests for access to information).

We will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

### Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see Pupil Requests below), or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action).

We are not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

### Pupil requests

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section **Whose Rights?** below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

Pupils at Lantern of Knowledge School are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any



relevant circumstances at home. Younger children, particularly those in their final year, may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

### **Parental requests**

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. We may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case-by-case basis.

### **Consent**

Where we are relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: certain types of uses of images, certain types of marketing and fundraising activity. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

### **Whose rights?**

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the School will assume that pupil consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be

in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's policies and the School rules. Staff are under professional duties to do the same covered under the relevant staff policy. Staff are also required to respect the personal data and privacy of others and comply with all School policies.

## **12. Data Accuracy and Security**

We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

Where possible we use publicly available sources to keep your records up to date; for example, the Post Office's National Change of Address database and information provided to us by other organisations as described above. We regularly contact parents with ways they can update their information and have self-update systems in place for these users.

We really appreciate it if you let us know if your contact details change by contacting us at [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk).

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why we may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this notice and their duties under Data Protection Law and will receive relevant training.

## **13. Direct Marketing**

We will contact you to let you know about activities at the School, news about current and former pupils, and to ask for donations or other support.

Occasionally, we may include information from partner organisations or organisations who support us in these communications. We make it easy for you to tell us how you want us to communicate, in a way that suits you.

If you do not want to hear from us, that is fine. Just let us know when you provide your data or contact us at [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk).

We do not sell personal details to third parties. We do share some information with alumni. We have a statutory duty to share some information when requested with government bodies when requested.

## **14. Photographs**

We use photographs of pupils, parents, staff, alumni, volunteers and other guests at School events for marketing, fundraising and other publicity purposes. We understand there are many valid reasons why you may not wish us to use your photograph or photographs of your children in this way. This is fine, just let us know you would like to opt out of giving your photography

permission by contacting us at [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk).

## **15. Pupil Data**

Pupil data is updated on a regular basis by staff, parents and pupils. Parents and Pupils are regularly invited to update pupil data where necessary.

## **16. Sharing your story**

Some people choose to tell us about their experiences at the School and or share photographs and memorabilia from their time at the School. They may also share stories about their life before or after their time with the School.

If we have the explicit and informed consent of the individual, or their parent or guardian if they are under 18, this information may be made public by us at events, in materials promoting the School or in documents such as The Lantern Times newsletter.

## **17. Your right to know what we know about you, make changes or ask us to stop using your data**

You have a right to ask us to stop processing your personal data, and if it is not necessary for the purpose you provided it to us for (e.g. processing your donation or registering you for an event) we will do so. Contact us on [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk) if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to The GDPR Team, Lantern of Knowledge School, 30-36 Lindley Road, London, E10 6QT. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

If you have any questions, please send these to [info@Lanternofknowledge.org.uk](mailto:info@Lanternofknowledge.org.uk) and for further information see the Information Commissioner's guidance on the ICO Website <https://ico.org.uk/>.

If you believe that we have not complied with this notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the GDPR Team. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving them.

## **18. Building profiles of supporters and targeting communications**

We use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our supporters. Profiling also allows us to target our resources effectively, which supporters consistently tell us is a key priority for them. We do this because it allows us to understand the background of the people who support us and helps us to make appropriate requests to supporters who may be able and willing to give more than they already do. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.

When building a profile we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. In doing this, we may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses, listed Directorships or typical earnings in a given area.

## **19. Changes to this Notice**

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the Lantern of Knowledge Website or by contacting you directly. If you have any questions, comments or suggestions, please let us know by contacting the GDPR Team.

## **20. Legal Underpinning of this Privacy Notice**

Various laws underpin this Privacy Notice and are relevant to Lantern of Knowledge School.

- The Data Protection Act 1998 and related statutory instruments (until 25 May 2018)
- The General Data Protection Regulation (from 25 May 2018)
- The Data Protection Act 2018 and related legislation (from 25 May 2018)
- The Privacy and Electronic Communications Regulations 2011 (PECR) (to continue after 25 May 2018 until replaced by the ePrivacy Regulation)
- The Protection of Freedoms Act 2012 (biometrics and CCTV)

Please note that independent schools are not subject to the specific information provisions (including the parental right to see the pupil record, and Freedom of Information).

## **21. Specific Information (In alphabetical order) Accidents and Incidents**

Lantern of Knowledge School keeps a record of all accident incidents that occur on site or as part of its activities. This is a legal requirement and helps us to monitor the health and safety of Staff, Pupils, and other visitors. Anyone who sustains an injury while on site or working away on School business should complete an accident report.

## **Admissions**

### **a) Agents**

Lantern of Knowledge School may occasionally use agents to assist in the recruitment of pupils. Where Lantern of Knowledge School receives information from an agent, it does so under the terms of the agent's privacy notice. Applicants who apply to Lantern of Knowledge School through an agent should familiarise themselves with their agent's privacy notice.

### **b) Applications & Enquiries**

By completing an enquiry form or by making an enquiry in person, over the phone or by email you consent to your details being used to facilitate the admissions process. You can remove yourself and your family from the admissions process at any time by contacting the admissions team. Data collected during an initial enquiry will be used for a full range of marketing activities, including sending School publications, notification of open days and other recruitment events and the sending of SMS text messages. If you are an alumni your details will be shared with the Lantern of Knowledge Trust, Lantern Relief and Jamia Siraj ul Uloom. Unless you notify us

otherwise, emails, letters and other communications with applicants may be tracked and stored for up to 15 years to ensure that we are better able to tailor our future recruitment processes. While processing your application, information concerning your child's performance at school, including their disciplinary record; school reports and examination results and financial information including information about the payment of fees may be requested from their current and or former schools.

Once a child has been admitted to the School the information on their formal application will form the basis of their pupil record and will be retained indefinitely.

### **c) Archives**

Records considered to be of historic value are retained in Lantern of Knowledge's archive indefinitely.

We share photographs and publications from our archives at events, through Lantern of Knowledge School community websites and through our social media platforms and process such information as a legitimate interest of the School.

Some academic research may be interested in individuals associated with the School. Personal data concerning living individuals, which is not in the public domain, is unavailable to researchers, unless the subject of the information provides written consent.

### **d) Bursaries**

In order to assess applications for bursaries fairly, the School requests information and documentation relating to the financial circumstances of those who have applied for means tested financial assistance. External publically available information may also be sought. All such information is treated as highly confidential and access to this financial information is strictly limited. Means tested assistance is reviewed regularly, and the information provided during the assessment process is stored for up to seven years after the pupil leaves the School. Records of named awards such as Student of the Year are recorded on an alumni record.

### **e) Current and Former Parents and Guardians**

As a current or former parent your data will be used for a full range of activities, including sending School publications, collection of School Fees, promotion of benefits and services available to parents and former parents, notification of alumni events and the sending of SMS text messages. Data will also be used in the School fundraising programmes and related research, which in turn may include wealth screening and analysis. Emails, letters and other communications with the School and alumni may be tracked and stored to ensure that we are better able to tailor our future communications.

The School processes data for guardians in the same way as it processes data held for current parents.

### **f) Current Pupils**

We hold personal data pertaining to children and use it to: support their teaching and learning; monitor and report on their progress; provide appropriate pastoral care; and assess how well we are doing as a school.

This information includes a pupil's contact details, national curriculum assessment results, attendance information and personal characteristics such as ethnic group, any special educational needs and relevant medical information. If enrolling for post 14 qualifications we may be provided with their unique learner number (ULN) by the Learning Records Service and may also obtain from them details of any learning or qualifications undertaken.

#### **g) Activities / Trips / Visits**

Lantern of Knowledge School collects and shares such information as necessary to facilitate pupil trips and visits both as part of its regular curriculum and as part of its co-curriculum programme. For example, it may be necessary to share medical information with staff taking a trip out of School.

#### **h) Display and Storage of Pupils' Work**

As part of the normal operation of the School it is necessary to collect, mark, display and distribute pupils work. For the most part personal information gathered during this process will be purely incidental – for example the name on the top on an essay. Staff must be cautious when arranging for the display or circulation of work that it does not inadvertently share biographical or other personal data.

Grading of work, and the storage of those grades will be collected by staff and shared with other staff as necessary to provide a suitable learning experience for pupils and for monitoring and assessing pupils, staff and our educational programmes. Marks may be shared with external bodies such as Examination Boards and or baseline assessment providers such as GL Assessments.

#### **i) Duke of Edinburgh's Award**

Pupils who are enrolled in the Duke of Edinburgh Award scheme will be asked to submit information to DofE directly or via Leyton Sixth Form College who manage the awards on behalf of the school. This information is not processed by Lantern of Knowledge School. For more information about how the DofE process data please visit <https://www.dofe.org/privacy-policy/> and <http://www.leyton.ac.uk/college-info/gdpr.html>.

#### **j) Medical Records**

When a pupil accepts a place at Lantern of Knowledge School, data relating to the health and medical record of that pupil will be collected. This might include medical records, details of any illnesses, allergies or other medical conditions suffered by the pupil.

Medical Records are Special Category Data, and the School uses this information in order to safeguard and promote the welfare of its pupils, for example the School uses details of any medical conditions so that staff will be able to respond appropriately in the event of a medical emergency. Medical information will be collated by the School's office and through a pupil's tutor. Medical record pertaining to a pupil will be destroyed after the pupil's 25th birthday.

#### **k) Special Educational Needs (SEN)**

When a pupil accepts a place at Lantern of Knowledge School, data relating to any disabilities and or special educational needs of that pupil will be collected. This might include by way of example medical records and or records of SEN assessments. The School will collect this information



through the School's office, Tutors, Teaching Staff and through its SEN teacher.

SEN Data is Special Category Data. Relevant SEN information will be shared with Lantern of Knowledge School Staff where appropriate to ensure that pupils with special educational needs are given the best possible learning, co-curricular and pastoral experience. Relevant information will also be shared externally with appropriate educational bodies for example with an examination or other awarding body. SEN information will also be used to measure the effectiveness of our SEN programme. SEN records pertaining to a pupil will be destroyed after the pupil's 25th birthday.

### **l) Public Examination Results**

It has long been a tradition in the UK for public examination results, such as GCSE, to be shared in the local media, such as on websites and in the local press. These may appear either in order of attainment, or alphabetically. Students or their parents may request not have their results published and should contact [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk) to make such a request. Similarly, winners of School prizes and other notable achievements are celebrated on Honours Boards within the School, and are shared in publications such as The Lantern Times newsletter.

Anonymised academic results may be shared with other organisations to facilitate the compilation of league tables and other metrics including "value added".

### **m) Youth Support Services**

Once a child is aged 13 or over, we are required by law to pass on certain information to providers of youth support services. This is the local authority support service for young people aged 13 to 19 in England. We must provide both the child's name and address, and that of their parents, and any further information relevant to the support services' role. Once a child is 16 years old, they or their parents can request that no information beyond names, address and your date of birth be passed to the support service.

### **n) Debtors**

Lantern of Knowledge School reserves the right to pursue all debtors to the School and organisations within the School Community. In extreme cases, we may work with a debt collection agency. Any actions taken to recover debts will be reasonable and proportionate to the amount owed. If we are unable to contact you using the contact information you have provided we reserve the right to use that data to trace your current contact details to enable the matter to be resolved.

### **o) Due Diligence**

There are a number of occasions where it is prudent for Lantern of Knowledge School to run checks into the background of suppliers, bursary recipients, supporters, parents and alumni. For example if a support pledges a large gift to the School or where the School intends to make a significant purchase from a supplier. Where the School deem it necessary to do so we reserve the right to perform credit checks and other legitimate forms of due diligence processing.

### **p) Email**

By its very nature, all email contains personal data, and Lantern of Knowledge School takes a

number of steps to secure its email systems. By emailing Lantern of Knowledge School the contents of your email, including your email address will be logged and stored on the School's IT systems. Your email address will then be used for future relevant correspondence, unless you request otherwise.

#### **q) Events**

By booking to attend a School, alumni society or School event, you agree that your data can be processed by Lantern of Knowledge School in order to facilitate your attendance at that events and similar future events that we believe may be of interest to you. If you would rather not be informed of future events please do let us know by contacting [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk).

#### **r) Food and Drink**

Where necessary we may collect and store meal preferences and information about allergies and other food related medical conditions for use in events both on and off site and for serving meals at School. As this information may include special category data about medical conditions and or ethnicity and religious beliefs.

#### **s) Gifts**

Records of gifts, including Gift Aid will be kept indefinitely so we can continue to engage with supporters and their families. Donors are asked if they would like their gifts recognised publically and have the option of being able to opt out of doing so.

#### **t) IT**

Use of our WIFI and other networks is monitored. We may record how many times you use a service, where you use it, at what times you use it, the quantity of data traffic and how long each session lasts as well as which sites you access. This information helps us to build a profile of our users for statistical purposes and to improve how we provide our service to you. IT usage that infringes our acceptable use policy may be shared with the relevant staff and or authorities so that appropriate action can be taken.

Most of this data will be aggregated into groups, which means that we will not be able to identify you individually. However to enforce our acceptable use policy we may collect identifying information about you and your devices including IP address, cookies, and or user information.

Our IT systems are backed up offsite, and some of our systems use cloud based storage. Off-site storage of data only happens on secure regulated servers within the UK or EU. Some data is collected using online forms. This data is also stored securely on the cloud.

#### **u) Lettings**

Any individual entering into a contract to let or rent part of Lantern of Knowledge School's facilities agrees to the School processing their data to fulfil the contract. We will also use your data to offer you information about similar opportunities in the future. With your consent we may also use information to promote future events and lettings.

#### **v) Alumni / Former Pupils**

As a former pupil, your data will be used for a full range of alumni activities, including sending

School publications, promotion of benefit and services available to alumni, notification of alumni events and the sending of SMS text messages. Your data will also be used in the School fundraising programmes and related research, which in turn may include wealth screening and analysis. Emails, letters and other communications with the School and alumni society may be tracked and stored, to ensure that we are better able to tailor our future communications.

#### **w) Sales**

To fulfil our obligations to individuals who purchase items of uniform, books or merchandise we will need to process your personal data. This will include payment information, order details, and if delivering an item contact details. When arranging delivery we will need to pass your contact details to a third party delivery company. This data will include geographical address, email and phone number.

#### **x) Scholarships**

Pupil's records will include all scholarships and awards. After leaving records of awards such as Student of the Year are recorded on an alumni's record.

#### **y) Self Employed Staff**

We process personal data relating to self-employed staff at Lantern of Knowledge School. This is for employment purposes and to assist in the running of the School, for example to enable appropriate background checks to be completed.

#### **z) Staff & PGCE Students**

We process personal data relating to those we employ to work at, or otherwise engage to work at, Lantern of Knowledge School. This is for employment purposes to assist in the running of the School and to fulfil our contractual arrangements, for example enabling individuals to be paid and to enable appropriate background checks to be completed.

This personal data includes identifiers such as names and National Insurance numbers and characteristics such as employment contracts and remuneration details, qualifications and absence information. We will not share information about you with third parties without your consent unless the law requires us to.

Where a member of staff and their spouse is required to be resident on School premises we will collect information to enable us to carry out suitable background checks in relation to the spouse.

In addition, we process personal data relating to individuals applying for roles at the School. Information related to unsuccessful applicants is destroyed within 12 months of their application being processed unless their consent has been given to retain the data.

In the case of PGCE students, Lantern of Knowledge School will share any information required by the student's institution as set out in the student's contract with the University.

#### **aa) Suppliers of Goods and Services**

Personal data relating to the suppliers of goods and services who are not corporate bodies is processed to enable the recording of transactions and the payment of monies due to the suppliers. This data will include name, address, telephone email and bank account details.

Where the supplier operates on School premises, it may also be necessary to undertake background checks on the supplier and or their employees.

#### **bb) Training**

Lantern of Knowledge School encourages its staff, students and volunteers to undergo training from time to time. As part of this process it may be necessary to share information such as previous qualifications, driver's licence details or other personal information with training providers and or awarding bodies. Records of such training are stored by The School.

#### **cc) Volunteers**

We are grateful to alumni, parents and other friends of the School who give of their time to support School activities. We necessarily require volunteers to provide information including name, contact details, address and date of birth. Where appropriate may require volunteers to supply further information to enable us to carry out suitable background checks. Volunteers who wish to receive communications from the School will be asked to share relevant data to do so.

#### **dd) Governors**

A special category of volunteer are Governors of the School, who may also be the charity's trustees. We process personal data relating to Governors and prospective Governors of Lantern of Knowledge School. This data will be shared with external bodies including the Charity Commission.

#### **ee) Wealth Screening**

As a fundraising organisation, we undertake in-house research and from time to time engage specialist agencies to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

We may also carry out wealth screening to fast track the research using our trusted third party partners. You will always have the right to opt out of this processing. We may also carry out research using publically available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We also use publicly available sources to carry out due diligence on donors in line with our code of ethical fundraising and to meet money laundering regulations.

This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

If you would prefer us not to use your data in this way, please email us at [info@lanternofknowledge.org.uk](mailto:info@lanternofknowledge.org.uk).