

**CFBL - Privacy Notice**  
**Applicable to all Members of the School Community (Past and Present)**

Authorised by:	The Board of Governors of CFBL
Date:	WR 15 November 2022
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## WHO WE ARE

The Collège Français Bilingue de Londres ("CFBL" or "the School") is a limited company (Company n°02804123) and charity (Charity n°1027932). Our registered address is 87 Holmes Road, London NW5 3AX. We are accredited by the French Ministry for Education, and are a partnership school of the Agency for French Education Abroad (AEFE). We are also registered as an independent school with the Department for Education.

We are the data controller for the purpose of the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018, and supporting legislation.

## WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School will use (or "**process**") personal data about individuals including: its staff; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "**parents**"). Collectively, we refer to these individuals in this Privacy Notice as the School's community.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils 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 the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and its staff or the parents of pupils;
- any policies or notices applicable to staff concerning the handling of personal data, including CFBL's Privacy Notice for Staff & Governors;
- the School's policy on Taking, Storing and Using images of Children;
- the School's CCTV policy;
- the School's document retention policy;
- the School's safeguarding and health and safety policies, including as to how concerns or incidents are reported or recorded; and
- the School's IT policies, including its E-Safety policy and Use of Telephone Email Systems and Internet for Staff policy.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors also referred to as trustees, and service providers) should also be aware of the Privacy Notice for Staff & Governors which provides further information about how personal data about those individuals will be used when processed in connection with their professional relations with the School. In the event of any conflict or inconsistency between this Privacy Notice Applicable to all Members of the School Community (Past and Present) and CFBL's Privacy Notice for Staff & Governors, the Privacy Notice for Staff & Governors will take precedence.

A privacy notice addressed to pupils over the age of 13 is annexed to this Privacy Notice. Once pupils reach the age of 13, and in accordance with Data Protection Law, they are considered sufficiently mature to give their consent or make a request themselves (see section **Whose Rights?** below). For this purpose, the School will treat all 4eme and 3eme pupils as being over the age of 13. In the event of any conflict or inconsistency between this Privacy Notice and CFBL Privacy Notice for Pupils, this Privacy Notice will take precedence.

## **RESPONSIBILITY FOR DATA PROTECTION**

The School has appointed a Data and Systems Manager who will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and UK data protection laws.

The Data and Systems Manager can be contacted at [dataprotection@cfbl.org.uk](mailto:dataprotection@cfbl.org.uk).

## **WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA**

In order to carry out its ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operations.

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

Other uses of personal data will be made in accordance with the School's 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.

The School expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- For the purposes of pupil's admission (and to confirm the identity, nationality and source of funds of prospective pupils and their parents);
- To provide education services whether on site or remotely (via Zoom, Google classroom or such other tools/platforms as the School may decide), including 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;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities (including French 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;

- 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 policies;
- To make use of photographic images/voice recordings/videos of pupils in School publications and communications in accordance with the School's policy on Taking, Storing and Using images of Children;
- For security purposes, including CCTV in accordance with the School's CCTV policy;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the School's purposes, including without limitation to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, trade union membership 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 will 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 or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff, volunteers and governors, for example DBS checks, welfare, union membership or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duty of care.

Finally, some data processing will be carried out by the School based on consent, for example **marketing and communication activities** and the use of personal data such as photographic images/videos/voice recordings of pupils, alumni and staff on the School website and on the School's social media channels, in accordance with the School's policy on Taking, Storing and Using images of Children. Consent may be withdrawn at any time, by contacting the Marketing Admissions & Communications Manager at [communication@cfbl.org.uk](mailto:communication@cfbl.org.uk).

#### **TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL**

This will include by way of example:

- names, addresses, date of birth, telephone numbers, e-mail addresses and other contact details of pupils and their parents;
- nationality/right to stay in the UK of pupils;
- previous/next schools attended by pupils and higher education provider attended by former pupils;
- parents' employers name;
- bank details and other financial information, e.g. about parents who pay fees to the School, and any anti money laundering/sanctions information we are required to collect by law;

- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health and welfare (including safeguarding information received from a previous school), and contact details for their next of kin;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents past and present; and
- images/voice recordings/videos of pupils (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 of Children).

## HOW THE SCHOOL COLLECTS DATA

Generally, the School receives 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 email or written assessments).

However in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual) or collected from publicly available resources.

## WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

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). Occasionally the School will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- other professionals (such as the school psychologist and speech therapist, CFBL Clubs' providers, sports national leagues, debt collection agencies);
- the School's caterer;
- government authorities (e.g. HMRC, DfE, police, the local authority, social care, CAHMS ...);
- appropriate regulatory bodies such as AEFÉ, OFSTED, the Charity Commission, Companies House, the Information Commissioner ...;
- management information systems used at CFBL (in particular WCBS, Factos, Pronote and Aymer) or such other third parties processing data on our behalf;
- the AEFÉ and AEFÉ schools in England and appropriate French government authorities (e.g. the MEN inspectorate, the French Embassy Cultural Services or Security Services or the French Consulate social services);
- when a complaint is raised and in accordance with the School Complaints Policy; and
- schools in the UK or abroad to be attended by current or former pupils.

Particularly strict rules of access apply in the context of:

- medical records;
- pastoral, learning support or safeguarding files.

**Medical data:** The school needs to process such information to comply with statutory duties and to keep pupils and others safe, but the school will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for school trips or for catering purposes. Express consent will be sought where appropriate.

However, a certain amount of any 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. The School uses Pronote, a secure software application which is used to record behavioural issues, sanctions and special educational needs.

**Safeguarding data:** 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, concerns on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO, social services or police. For further information about this, please view the School's Child Protection Policy.

Finally, in accordance with UK data protection laws, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems and platforms, payroll providers, video conferencing providers, management information systems, freelance contractors or cloud storage providers. This is subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

## **TRANSFERS ABROAD**

In order to undertake international trips, the School will on occasion transfer personal data outside the European Economic Area (EEA). In addition, some of the School's processing activity carried out by third parties, for example webhosting and video conferencing, takes place outside the EEA. The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, the School will implement appropriate measures to ensure that personal data remains protected and secure in accordance with applicable data protection laws.

## **HOW LONG WE KEEP PERSONAL DATA**

The School 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 pupil personal files is up to 7 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.

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 Data and Systems Manager at [dataprotection@cfbl.org.uk](mailto:dataprotection@cfbl.org.uk). However, please bear in mind that the School 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 the fact in order to fulfil your wishes (called a "suppression record").

## **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 events of interest, including by sending updates and newsletters, by email and by post. The School will also use the contact details of (former) parents, alumni and other members of the School community to develop its own strategy.

Following an initial contact, any subsequent data processing for these purposes will be based on consent. Consent may be withdrawn at any time, by contacting the Marketing Admissions & Communications Manager at [communication@cfbl.org.uk](mailto:communication@cfbl.org.uk). However, the School is 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).

## **YOUR RIGHTS**

Individuals have various rights under UK data protection laws to access and understand personal data about their own personal data held and processed by the School, and in some cases ask for it to be erased or amended or have it transferred elsewhere, 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 Data and Systems Manager ([dataprotection@cfbl.org.uk](mailto:dataprotection@cfbl.org.uk)).

The School 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 generally one month, but actually fulfilling more complex or multiple requests e.g. those involving third party information, may take 1-2 months longer).

- Rights of access, etc.

The School 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 UK data protection law allows it).

If you consider that the personal data we hold on you is inaccurate, please let us know. However, the School will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

- Requests that cannot be fulfilled

You should be aware that your rights under UK data protection laws (including the right of access) are limited to your own personal data, and certain data is exempt. Exempted data will include, for example and without limitation: information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further 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); information which sharing could endanger your child; or information which cannot be shared due to an ongoing police investigation.

The School is also 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 their ordinary publication, nor share any confidential reference held by the School that was (or will be) given for the purposes of the education, training, appointment 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 proportionate legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Requests by or on behalf of pupils

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). The School will consider that all 4eme and 3eme pupils have sufficient maturity for this purpose. A pupil of any age may ask a parent or other representative to make a subject access request on their 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. Requests not considered in the child's best interests may sometimes be refused.

Pupils aged 13 and above 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.

### Parental requests, etc.

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. The School 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, court orders, or pastoral issues.

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 the School is 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 use of photographic images/videos/voice recordings on our website and on social media platforms for marketing and communication purposes.

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, either alongside or in place of parental 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 pupils' 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 E-Safety policy and the School Rules. Staff are under professional duties to do the same covered under the relevant staff policy.

## **DATA ACCURACY AND SECURITY**

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

Individuals must please notify the Admissions Officer on [admissions@cfbl.org.uk](mailto:admissions@cfbl.org.uk) of any significant changes to important information, such as contact details, held about them. Staff members are requested to update their details directly on the platform providing payroll (e.g. Access or such other platform that may replace Access) or pension services, and inform HR accordingly. If the information concerned is not on said platform, please contact [a.koumba@cfbl.org.uk](mailto:a.koumba@cfbl.org.uk).

An individual has the right to request that any out-of-date, irrelevant, inaccurate or misleading information about them is erased or corrected (subject to certain exemptions and limitations under applicable data protection laws): please see above for details of why the School 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 policy and their duties under Data Protection Law and receive relevant training.

### **THIS POLICY**

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

### **QUERIES AND COMPLAINTS**

Any comments or queries on this policy should be directed to Data and Systems Manager at [dataprotection@cfbl.org.uk](mailto:dataprotection@cfbl.org.uk).

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints / grievance procedure and should also notify the Data and Systems Manager. 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 the regulator. The ICO can be contacted at <https://ico.org.uk/global/contact-us/>

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Last review by management: November 2022



## CFBL's Privacy Notice for Pupils

Authorised by:	The Board of Governors of CFBL
Date:	WR 15 November 2022
Review Date:	A least <u>annually</u> November 2023 and/or following any updates to national and local guidance and procedures
Circulation:	Governors/all staff/volunteers, automatically Staff: on Staff shared drive > Policies + School website Parents/pupils > on request/School Website

### WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to let you know how CFBL (also called the "School" in this document) is going to use your personal data. "Personal data" means information that relates to a person. We are providing you with this information because the law gives people rights to understand how their personal data is used. By "used", we mean how personal information about you is collected, held and shared.

Under the law, children who are 13 and older are considered mature enough to make certain decisions and requests about their data. CFBL has decided to treat all pupils in 3eme and 4eme as being over the age of 13, even if you aren't actually 13 yet.

CFBL's Privacy Notice Applicable to all Members of the School Community can be found on our website and complements this notice. In the event of any conflict or inconsistency between this Privacy Notice for Pupils and CFBL's Privacy Notice Applicable to all Members of the School Community, CFBL's Privacy Notice Applicable to all Members of the School Community will take precedence.

### RESPONSIBILITY FOR DATA PROTECTION

The person responsible for data protection at the school is the Data and Systems Manager, and you can contact them by emailing [dataprotection@cfbl.org.uk](mailto:dataprotection@cfbl.org.uk).

### WHAT KINDS OF PUPIL DATA

The categories of pupil information that CFBL collects, holds and shares include:

- Personal information (such as your name, your date of birth and your address, which school you are coming from or leaving to);
- Information about you and your family's circumstances to safeguard your welfare and provide appropriate pastoral care;
- Characteristics (such as what languages you speak and your nationality);
- Admissions and attendance information, for example the reasons for your absences;
- Academic and disciplinary records, including references;
- Other relevant information provided by previous educational establishments and/or other professionals or organisations working with you;
- Correspondence with and concerning staff, students and parents past and present;
- Information about your health and any special needs; and
- Images and recordings of you during school activities, at school functions and performances (such as photographs, CCTV, videos, voice recordings)

## WHY THE SCHOOL NEEDS TO PROCESS YOUR PERSONAL DATA

We collect and use this information to:

- allow or support your learning;
- allow or support extra-curricular activities;
- monitor and report your progress;
- ensure your welfare, safety and security;
- give and receive information and references about you, including relating to outstanding fees or payment history, to/from any education provider that you attended or where it is proposed you attend;
- assess the quality of and adjust our services;
- communicate about CFBL and proceed with our marketing activities;
- maintain the relationship with our school community including after you leave our School;
- enable you to take part in national or other assessments, and publish the results of public examinations or other achievements of pupils of CFBL;
- carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- comply with the law; and
- where otherwise reasonably necessary for our School's purposes, including to obtain appropriate professional advice and insurance for our School.

**Special Category Personal Data:** In addition, CFBL will on occasion need to process special category personal data (concerning health, ethnicity, religion, sexual life or criminal records information), to:

- safeguard your 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 medical conditions or other relevant information where it is in your interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- provide educational services in the context of any special educational needs that you have;
- provide moral education respectful of all beliefs;
- as part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; 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.

## THE LAWFUL BASIS ON WHICH CFBL USES THIS DATA

A lot of pupil data is used in order to comply with other laws, for example about keeping a register of pupils. Other data is used for the purpose of allowing you to make the best of your time at School. CFBL will therefore have what is called a "legitimate interest" for processing the information. Finally, in some cases, CFBL uses the data only with your agreement (called "consent"), for example when putting a photograph, a soundtrack, a piece of work or a video of you on the School's website. If you give your consent, you are always allowed to change your mind later. To withdraw your consent at CFBL, you have to email [communication@cfbl.org.uk](mailto:communication@cfbl.org.uk).

## HOW CFBL COLLECTS DATA AND WHO HAS ACCESS TO IT

CFBL receives most of the data from you and your parents or carers. In some cases, data comes from someone else such as another school. For the most part, data collected by CFBL remains within the School. Some data will be shared with your parents or carers.

Occasionally, CFBL needs to share the data with other organisations CFBL works with, such as professional advisers (for example the lawyers, insurers, accountants, school psychologist, speech therapist ...) or service providers (Clubs providers, travel agencies, ...), regulatory and government bodies (such as the DfE, the police or the local authority), the AEFÉ or support service providers (for example IT software providers/platforms and video conferencing platforms, the School's caterer).

Finally, sometimes data has to be transferred abroad, for example for a school trip.

CFBL keeps data only for so long as it is necessary to keep for a legitimate reason. The exact time data is kept depends on the nature of the information being kept.

## **YOUR RIGHTS**

Under the law, you have the right to request access to information about you held by CFBL; however please be aware that CFBL is not obliged to provide certain data.

To make a request for your personal information, contact [dataprotection@cfbl.org.uk](mailto:dataprotection@cfbl.org.uk).

You also have the right to:

- object to processing of your personal data
- prevent processing for the purpose of direct marketing
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;

If you have a concern about the way CFBL uses your personal data, we request that you raise your concern with us first by emailing [dataprotection@cfbl.org.uk](mailto:dataprotection@cfbl.org.uk) . Alternatively, you have the right to contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

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Last review by management: November 2022