



PHOENIX BAY

PRIVACY POLICY

Policy Number	V1
Date Created	July 2021
Owner	Principal
Next Review Date	July 2022

Document History

Version	Comments/amendments	Name	Date
1.0	Issue	Ross Banks	July 2021

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1. Introduction

This privacy notice explains how we collect, store and use personal data about students. We, Phoenix Bay are the 'data controller' for the purposes of data protection law. Our data protection officer is Jacqui Sloane, Chief Operations Officer (COO).

Phoenix Bay is an independent therapeutic day school in the South West. We are an all-through school that supports young people aged 5-16 who do not find it easy to fit into an existing mainstream educational provision. Working closely with families, it is our intention that every student achieves their full potential in both academic and personal development.

We are passionate about providing the appropriate support, care, nurture, and educational strategies that will allow these amazing young people to succeed in reaching for their dreams. Our aim is to help students achieve the skills and talents they need to flourish and have successful life chances.

2. The personal data we collect and hold

We hold personal data about students, their parents or carers to support teaching and learning, to provide pastoral care and to assess how the school is performing. We may also receive data about students from other organisations including, but not limited to, other schools, local authorities, health care providers and the Department for Education.

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents, National Insurance number.
- Results of internal assessments
- Student and curricular records
- Characteristics, such as ethnic background, Early Years Pupil Premium, 30 hours eligibility or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs and videos

Why we use this data

We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services (including monitoring staff performance)
- Comply with the law regarding data sharing

Our legal basis for using this data

We collect and use personal data on the basis of performing a public task (educating children).

On some occasions we may ask for consent to process data when its use is optional. On those occasions consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Collecting this information

We collect / obtain data from students, parents, carers, teachers and other professionals where relevant (e.g. G.P, hospital, social workers etc.)

How we store this data

We keep personal information about students while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. We will only retain the data we collect for as long as is necessary. This would be to satisfy the purpose for which it has been collected in accordance with our data retention policy. Please contact us if you would like further details on this policy.

The security of data and information is important to us. This is why we follow a range of security policies and procedures to control and safeguard access to and use of your personal information. This includes both physical and technical security and integrity of all data.

Processing Images off site

On evenings and weekends, staff sometimes work at home on formative assessment that contributes to Learning and Teaching, planning and documentation on the walls in school. This is made safe by storing images/files on encrypted laptops or memory sticks that are password protected.

Data sharing

We do not share any of this data with any other organisation without your permission, except where the law requires it. We are required to provide student data to central government through the Department for Education and the Education Funding Agency. Where it is necessary to protect a child, the school will also share data with the Local Authority Children's Social Services, medical professional and/or the Police.

We do not transfer personal data to countries outside the European Economic Area.

3. Parents and students' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them. This includes access to their child's educational record. This should be made in writing or by e-mail, (please see the contact section below), and Phoenix Bay will respond within a 15 school days timescale.

Parents/Carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 16), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, we will:

- Give you a copy of the information in an intelligible form
- Give you a description of the data we hold
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If we cannot provide information to you, we will give you a description of the information we hold and the reason why it cannot be disclosed to you at the time of your request.

Other rights

- Individuals have rights regarding how their personal data is used and kept safe, including the right to:
 - Object to the use of personal data if it would cause, or is causing, damage or distress
 - Prevent it being used to send direct marketing
 - Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
 - In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
 - Claim compensation for damages caused by a breach of the data protection regulations
 - To exercise any of these rights, please contact our data protection officer.

5. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

Report a concern online at <https://ico.org.uk/concerns/>

Call 0303 123 1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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Document Title	Privacy Policy
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Privacy Policy v1

Privacy Policy

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Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer

Privacy Policy

This privacy policy applies between you, the User of this Website and, the owner and provider of this Website. takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: www.spbridge.co.uk

Please read this privacy policy carefully.

1. Definitions and interpretation

In this privacy policy, the following definitions are used:

Data	Collectively all information that you submit to via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
Data Protection Laws	Any applicable law relating to the processing of personal data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK
GDPR	The General Data Protection Regulation (EU)
Us	A company incorporated in England with registered number 13453092
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
User or you	Any third party that accesses the website and is not either (i) employed by, and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to and accessing the website in connection with the provision of such services
Website	the website that you are currently using, www.spbridge.co.uk , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

- the singular includes the plural and vice versa.
- references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy.
- a reference to a person includes firms, companies, government entities, trusts and partnerships.
- "including" is understood to mean "including without limitation".
- reference to any statutory provision includes any modification or amendment of it.
- the headings and sub-headings do not form part of this privacy policy.

2. Scope of this privacy policy

3. This privacy policy applies only to the actions of and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, is the "data controller". This means that determines the purposes for which, and the manner in which, your Data is processed.

Data collected

5. We may collect the following Data, which includes personal Data, from you:
 - a. name.
 - b. contact Information such as email addresses and telephone numbers.
 - c. IP address (automatically collected);in each case, in accordance with this privacy policy.

How we collect Data

6. We collect Data in the following ways:
 - a. data is given to us by you; and
 - b. data is collected automatically.

Data that is given to us by you

7.

will collect your Data in a number of ways, for example:

1. when you contact us through the Website, by telephone, post, e-mail or through any other means.
2. when you elect to receive marketing communications from us.
3. when you use our services.

in each case, in accordance with this privacy policy.

Data that is collected automatically

8. To the extent that you access the Website, we will collect your Data automatically, for example:

1. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
2. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

Our use of Data

9. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

a. internal record keeping.

b. improvement of our products / services.

in each case, in accordance with this privacy policy.

10. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

Who we share Data with?

11.

We may share your Data with the following groups of people for the following reasons:

1. any of our group companies or affiliates - to ensure the proper administration of your website and business.
2. our employees, agents and/or professional advisors - to obtain advice from professional advisers.

in each case, in accordance with this privacy policy.

Keeping Data secure

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13. 14.

We will use technical and organisational measures to safeguard your Data, for example:

- a. access to your account is controlled by a password and a username that is unique to you.
- b. we store your Data on secure servers.

Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: enquiries@spbridge.co.uk.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems,

please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data retention

15. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.

16. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

17.

You have the following rights in relation to your Data:

a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information, we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

2. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
3. **Right to erase** - the right to request that we delete or remove your Data from our systems.
4. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.

e. **Right to data portability** - the right to request that we move, copy or transfer your Data.

f. **Right to object** - the right to object to our use of your Data including where we use it for our

legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: enquiries@spbridge.co.uk.

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

18. 19.

20.

Links to other websites

21. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

22.

23. 24.

may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of .Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Cookies

This Website may place and access certain Cookies on your computer. uses Cookies to improve your experience of using the Website. has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

This Website may place the following Cookies:

1. Introduction

The term EAL is used when referring to students whose main language at home is a language other than English. This policy sets out the school's aims, objectives, and strategies with regard to the needs and skills of EAL students.

Aims

- To welcome and value the cultural, linguistic and educational experiences that students with EAL bring to the School.

- To implement schoolwide strategies to ensure that EAL students are supported in accessing the curriculum
- To help EAL students to become confident and fluent in English in order to be able to fulfil their academic potential.

Objectives

- To be able to assess the skills and needs of students with EAL and to give appropriate provision throughout the school
- To equip school staff with the knowledge, skills and resources to be able to support and monitor students with EAL
- To monitor students' progress systematically and use the data in decisions about classroom management and curriculum planning.
- To maintain students' self-esteem and confidence by acknowledging and giving status to their skills in their own languages

2. School/ Class Ethos

- Recognise the child's mother tongue; boost the child's self-esteem. Remember he/she has the potential to become a bi-lingual adult
- Classrooms need to be socially and intellectually inclusive, valuing cultural differences and fostering a range of individual identities
- Identify the student's strengths
- Acknowledge the time it takes to become fluent in an additional language, with a good command of the range of language needed for academic success

3. Teaching and Learning

- Assess the student's competence in English in relation to the NC standards and expectations as soon as possible
- Show differentiated work for EAL students in planning
- Have high expectations; expect students to contribute and give you more than one word answers
- Monitor progress carefully and ensure that EAL students are set appropriate and challenging learning objectives
- Recognise that EAL students need more time to process answers
- Allow students to use their mother tongue to explore concepts
- Give newly arrived young children time to absorb English (there is a recognised "silent period" when children are beginning to understand more English than they used to – this will pass if their self-confidence is maintained)
- Group children to ensure that EAL students hear good models of English
- Use collaborative learning techniques

4. School staff responsibilities

To obtain, collate and distribute information on new students with EAL. This includes;

- Language spoken at home.
- Information from the previous school with regards to level of English studied/used.
- Details of curriculum at previous school

5. Principal

To ensure that:

All involved in teaching EAL learners liaise regularly

- Parents and staff are aware of the school's policy on students with EAL
- Relevant information on student's with EAL reaches all staff
- Training in planning, teaching and assessing EAL learners is available to staff
- Challenging targets for students learning EAL are set and met The effectiveness of the teaching of students with EAL is monitored and data is monitored
- Oversee initial assessment of students' standard of English
- Give guidance and support in using the assessment to set targets and plan appropriate work (complete an individual learning plan for each student)
- Provide advice to teachers and support staff on classroom strategies
- Monitor standards of teaching and learning of students with EAL
- Liaise with the Multi-Cultural Service
- Liaise with parents/guardians
- Support the student's language development both in class and by withdrawal (for 1-1 work) as appropriate
- Report to the Headteacher on the effectiveness of the above and the progress of students.

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