



**Online Learning Privacy and Cookie Policy
2026 - 2027**

Version	4.0
Document authors (name)	Melissa McBride
Policy Owner	Sophia High School - Vanessa Temple

Audience	
Target	Parents / Students
Policy Location	Website / School Drive

Version control	
Implementation date	1 August 2020
Reviewed and updated	4th August 2023
Reviewed and updated	1st August 2024
Reviewed and updated	August 2025
Reviewed and updated	August 2026
Next Review date	August 2027

Online Learning Privacy Policy

INTRODUCTION

Sophia High School is committed to protecting the privacy and security of personal information. This notice explains how the school collects, uses, and discloses personal information about students and their families.

We are committed to protecting and respecting your and your child's privacy. Sophia is an edtech company which is the parent group of Sophia High School. In this privacy notice, references to "**we**", "**us**", "**our**", or "**Sophia**" is a reference to Sophia High School, the school which your child is attending, may be attending or has attended.

This privacy notice sets out the basis on which any personal data we collect from you or your child, or that you provide to us, is handled by us. We also have a privacy policy for our pupils, this is available on our website.

Please read the following carefully to understand our views and practices regarding your and your child's personal data and how we will treat it.

We comply with all applicable data protection laws and regulations ("**Data Protection Legislation**"), which may include the General Data Protection Regulation 2016/679, the Data Protection Act 2018, and the Data Use and Access Act (DUAA) 2025. The Data Protection Legislation continues to change in the UK, following the UK's exit from the European Union and we continue to update our practices in light of these changes. For the purposes of the Data Protection Legislation, we are the data controller and our School Support Centre at Sophia Technologies, The Engine Room, Battersea Power Station, 18 Power Station Road, London, UK, SW11 8HZ

Overview:

Read in conjunction with our Privacy Notices for Parents and Students, this notice explains how the school collects, uses, and shares information about you during online learning.

USES MADE OF THE INFORMATION

To ensure that educational content is presented in the most effective manner, and our pupils' online experience is as appropriate as possible, delivery of educational services via our DLP will involve the processing of personal data, including in the following contexts:

- pupils participating in live, online, interactive lessons and tutorials with other pupils and teachers;
- pupils participating in live video calls and tutorials with other pupils and teachers; online chat services;
- one-on-one sessions between teachers and pupils in specific cases for example for SEN, or for IGCSE/A Level tuition;
- pupil to pupil interaction;
- peer review: teachers reviewing other teachers' lessons for quality assurance;
- recordings of the remote classes being made by the School and stored on the DLP ("Recordings"); and

- recordings being shared between SHS and quality advisory teams such as OFSTED and CIS.
- recordings prepared to share with partner schools or authorities for the purpose of CPD.

Recordings, transcripts and other educational content must not be used to harass, intimidate, ridicule, impersonate or otherwise target members of staff, students or other members of the school community. Unauthorised sharing, manipulation or misuse of recordings may result in disciplinary, safeguarding or legal action.

BASIS OF PROCESSING

The School's processing of personal data via the DLP is necessary for its legitimate interests, which in this context includes the following purposes:

- to deliver educational services to our pupils and to monitor pupils' progress and educational needs;
- to promote and fulfil the objects and interests of the School and ensure its efficient management and administration; and
- to safeguard our children's welfare and provide appropriate pastoral care whilst they are taking part in the DLP.

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

Supervision of Breakout Rooms and Collaborative Online Learning

Breakout rooms are an integral part of the school's delivery model, enabling paired and small-group collaborative work in line with the pedagogy of the Online Learning Policy. The school's approach to safeguarding within breakout rooms **follows the principles of Keeping Children Safe in Education: supervision that is reasonable, proportionate and appropriate to the setting, rather than continuous surveillance of every pupil interaction — the same standard that applies to group work, corridors and shared spaces in a physical school.**

The following controls apply whenever breakout rooms are in use:

1. The class teacher retains host control of the whole session at all times, remains present in the lesson throughout, and moves between breakout rooms on an unannounced basis, as a teacher would circulate between groups in a physical classroom.
2. Breakout groups are kept deliberately small, consistent with the school's small-group model.
3. Every pupil retains an immediate exit at all times: any pupil may leave a breakout room and return to the main room, or leave the lesson entirely, at any moment. Pupils learn from home, with a parent or carer contactable as set out in the Online Learning Policy.
4. All pupils are taught, and sign an age-appropriate Digital Safety Agreement committing to, the expectation that they report immediately to an adult anything that makes them uncomfortable, in a breakout room or anywhere else online. The school's behaviour and anti-bullying expectations apply in breakout rooms exactly as they do in the main classroom and in a physical school.
5. Concerns raised about conduct in breakout rooms — by a pupil, parent or member of staff — are followed up promptly under the school's Safeguarding and Child Protection Policy and Behaviour Policy, and grouping arrangements may be adjusted while any concern is looked into.

6. Structured weekly parent contact provides a regular, reliable route through which concerns about peer interactions are surfaced and acted upon.

The school keeps this model under review as part of its annual policy cycle and its ongoing risk assessment of remote learning.

THIRD-PARTY SOFTWARE PLATFORMS

We use third party software platforms including, but not limited to, Google, Athena facilitate our DLP; please also read the privacy notices, and applicable terms and conditions, provided by any such third parties. The third party notices will set out the data collection, use, and retention for the service they are providing. This notice only sets out how the School uses personal data for its DLP.

HOW LONG WE KEEP PERSONAL INFORMATION

The Recordings shall be retained by the School for so long as the DLP is maintained by the School and thereafter in accordance with the School's Retention Policy.

DATA RETENTION — STUDENT RECORDS

How Long We Keep Student Information

We retain student data in accordance with education legislation, data protection law, and safeguarding requirements.

Key Retention Periods:

- Student records and safeguarding files: Date of birth + 25 years
- Attendance records: 3 years after the pupil leaves
- Financial records: 6 years from the end of the relevant financial year
- Digital learning materials: Duration of education plus 6 years
- General communications: 1–2 years, unless linked to a safeguarding or complaints matter, in which case the relevant longer period applies

Legal Basis

These periods are required by education legislation, UK GDPR, and safeguarding guidance, to support ongoing education, legal obligations, and child welfare.

Your Rights

Under the Data Use and Access Act (DUAA) 2025, you can request access to your child's records during these retention periods. We conduct reasonable and proportionate searches when responding to requests.

For full details, contact our Data Protection Officer at dataprotection@sophiahigh.school

DATA PROTECTION COMPLAINTS

If you have concerns about how we handle your personal data, we are here to help resolve them quickly and fairly.

Enhanced Complaints Process Under the Data Use and Access Act (DUAA) 2025, we provide accessible complaints procedures specifically for data protection matters. We will acknowledge your complaint within 30 days and respond without undue delay.

Submit a Complaint Use our [online complaints form](#) to raise any data protection concerns. The form is designed to capture the information we need to investigate your complaint thoroughly.

Your Rights You retain the right to contact the Information Commissioner's Office (ICO) at any time about data protection matters, whether or not you use our internal complaints procedure first.

Contact the ICO:

- Website: ico.org.uk
- Telephone: 0303 123 1113

Alternative Methods If you prefer not to use the online form, you may also submit data protection complaints by email to dataprotection@sophiahigh.school or by post to:

Sophia High School,
Office 315,
The Engine Room,
Battersea Power Station,
London,
SW11 8DZ

REASONABLE and PROPORTIONATE SHARING OF INFORMATION

When required to share information (via a Subject Access Request), we are required by law to share what is reasonable and proportionate. Transcripts only of video recordings will be shared.

QUESTIONS

If you have any questions about this supplementary privacy notice, please contact the School's DPC.

CHANGES TO THIS POLICY

The School reserves the right to update this supplementary notice at any time. You will be notified of any material change.

Contact Information

Data Protection Officer

Fernando Darcie dataprotection@sophiahigh.school