Privacy Notice – Children Missing Education (CME)

London Borough of Havering

Who We Are

London Borough of Havering (LBH) is the Data Controller for the personal information we collect and process for the purposes of fulfilling our statutory duties relating to Children Missing Education (CME). We take the privacy and security of your information seriously.

If you have any questions about how your data is used, you can contact our Data Protection Officer (DPO):

Data Protection Officer
London Borough of Havering
Email: **DPO@havering.gov.uk**
Postal address: Town Hall, Main Road, Romford, RM1 3BB

What Data We Collect

To identify and support children who may be missing education, we may collect and process the following information:

- Child's name, date of birth, gender
- Parent/carer names and contact details
- Home address and previous addresses
- School history, attendance information and previous education placements
- Unique Pupil Number (UPN)
- Special educational needs or disabilities (SEND) information
- Ethnicity and language
- Immigration status (where relevant to education provision)
- Information relating to vulnerabilities or safeguarding concerns
- Information provided by schools, local authorities, or other agencies involved in the child's welfare

Some of this information is required by law to enable us to carry out our statutory duties. If you do not provide information when requested, we may be unable to assess your child's educational status or fulfil our legal responsibilities.

How We Collect Your Data

We receive information directly from parents and carers, schools, other LBH departments, other local authorities, and partner agencies involved in supporting children and families. We do not obtain information from publicly available sources.

Why We Collect Your Data

We use your information to:

- Identify children who may not be receiving suitable education
- Carry out checks to establish a child's educational status
- Support families to secure appropriate education provision
- Track and monitor CME cases
- Make enquiries with schools, local authorities, and partner agencies
- Fulfil our legal duties to safeguard and promote the welfare of children

Lawful Basis for Processing

We process personal data under:

UK GDPR Article 6(1)(e) – Public Task:
Processing is necessary for us to perform our statutory functions in the public interest.

Our statutory duties include:

- **Education Act 1996 – Section 436A** (duty to identify children missing education)
- **Education and Inspections Act 2006**
- **Children Act 2004 – Sections 10 and 11** (duty to safeguard and promote welfare)
- **Working Together to Safeguard Children** (statutory guidance)

Where we process special category data (e.g., health, ethnicity), we rely on:

- **UK GDPR Article 9(2)(g)** – substantial public interest
- **Data Protection Act 2018, Schedule 1, Part 2** – safeguarding of children and individuals at risk

We do not rely on consent for CME processing.

Who We Share Your Data With

We only share information when necessary to fulfil our statutory duties. This may include:

- Schools and academies

- Other LBH departments (Admissions, SEND, Early Help, Social Care)
- Other local authorities
- Police and law enforcement agencies
- NHS services where safeguarding concerns require it
- Youth services and alternative education providers
- Department for Education (DfE)

We do **not** share your information for marketing purposes.
We do **not** transfer your data outside the UK.

How Long We Keep Your Data

We keep CME records in line with our retention schedule. This is typically **up to 27 years from the child's date of birth**, after which the information is securely destroyed.

How We Protect Your Data

We use technical and organisational measures to keep your information secure, including access controls, secure systems, and staff training. Only staff who need access to your information to carry out their duties are permitted to view it.

We do not use automated decision-making or profiling for CME purposes.

Your Rights

Under the UK GDPR, you have the following rights:

- To access your personal data
- To request correction of inaccurate information
- To request deletion of your data (in certain circumstances)
- To restrict or object to processing where applicable
- To request that we transfer your data to another organisation (data portability, where applicable)
- To object to processing carried out under Public Task

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office
Website: www.ico.org.uk
Telephone: 0303 123 1113