



Data Protection & GDRP Policy

Data Protection Policy

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Reviewed By: A Evans & SLT

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Updates and Amendments to Policy

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Section 1

Policy Statement

This policy is intended to provide information about how Avalon School will collect, use or process, store and dispose personal data about individuals including its staff, its current, past and prospective pupils and their parents/carers (referred to as “parents” in this policy).

This information is gathered in order to enable Avalon School to provide education and other associated functions. In addition, there may be legal requirements to collect and use information to ensure that the school complies with its statutory obligations. Data Protection Law gives individuals rights to understand how their data is used and Avalon School encourages all individuals to read this policy and Privacy Notices (Appendix A and B) thereby understand the school’s obligations to its entire community. The Privacy Notices apply in addition to the school’s other relevant terms and conditions and policies.

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 2018 includes the UK’s implementation of the General Data Protection Regulations (GDPR), and other related legislation. It will apply to information regardless of the way it is collected, used or processed, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

Section 2

Definition of Personal Information

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

Section 3

Responsibility for Data Protection

In accordance with the Data Protection Act 2018 schools have a duty to be registered, as Data Controllers, with the Information Commissioner’s Office (ICO) detailing the information held and its use. Avalon Schools ICO registration number is Z9721295. Avalon School also has a duty to issue a Privacy Notices (Appendix A and B) to all pupils/parents and staff, these summarises the information held on individuals, why it is held and the other parties to whom it may be passed on.

The Headteacher is the appointed person who deals with all requests and enquiries concerning the school’s use of individuals personal data and will endeavour to ensure that all personal data is processed in compliance with this policy and all data protection laws and regulations.

Section 4

Why the School Needs to Process Personal Data

In order to carry out its ordinary duties 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 operation. Some of these activities the school needs 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 admission, to confirm the identity of prospective pupils and their parents and retain a record if appropriate for the purposes of future applications;
- To provide education services across the whole curriculum, including peripatetic musical education, physical education 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 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 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;
- 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 Acceptable Use of IT Policy;
- To make use of photographic images of pupils 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 children;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- Where otherwise reasonably necessary for the school's purposes, including 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, biometrics 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 and/or disability of a pupil;

- In connection with employment of its staff, 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;
- 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.

Section 5

Types of Personal Data Processed by Avalon School

This will include by way of example:

- Names, addresses, telephone numbers, email addresses and other contact details; car details (staff and visitors);
- Bank details and other financial information, e.g. about parents who pay fees to the school, and any anti money laundering 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;
- Personnel files, including in connection with academics, employment or safeguarding; where appropriate, information about individuals' health and welfare, 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 staff, pupils and parents past and present; and images 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);

Section 6

How the School Collects Data

Generally, Avalon 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)

Section 7

Who has Access to Personal Data and Wo Avalon School Shares it with

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

- appropriate contractors, such as visiting music tutors, sports coaches etc;
- Professional advisers (e.g. lawyers, insurers, accountants etc);
- Stage 3 complaints panels, which will include independent panel members;

- Government authorities (e.g. HMRC, DfE, CAF/CASS, police or the local authority);
- Appropriate regulatory bodies (DfE, ISI, ISC, ISA, Teaching Regulation Agency)

For the most part, personal data collected by Avalon 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 "special category data", most notably:

- Medical Records

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.

- Pastoral or Safeguarding Files.

However, a certain amount of any SEND 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 LADO or police. For further information about this, please view the school's Safeguarding Policy.

KCSIE also requires that, whenever a child leaves the school to join another school or college, his or her child protection file is promptly provided to the new organisation. The school will retain a copy in accordance with its retention policy for material related to safeguarding matters.

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, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

Section 8

How Long will Personal Data be Kept

Avalon 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 staff and pupil personnel 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 Headteacher. 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").

Section 9

Keeping in Touch and Supporting Avalon School

Avalon 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 by email and by post. Unless the relevant individual objects, the school will:

- Contact parents and/or alumni by post and email in order to promote and raise funds for the school;

Should an individual wish to limit or object to any such use, or would like further information about them, please contact the Headteacher in writing. Individuals have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school is nonetheless likely to retain some personal details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Section 10

An Individual's Right

10.1 Rights of Access

Individuals have various rights under Data Protection Law to access and understand personal data about them held by Avalon 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. Avalon 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).

Any individual wishing to access or amend their personal data or wish 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 Headteacher. Avalon 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 one month in the case of requests for access to information but actually fulfilling more complex requests may take 1-2 months longer).

Avalon School will be better able to respond quickly to smaller, targeted requests for information made during term time. 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).

If an individual considers that the personal data the school holds on them is inaccurate, please contact the school. 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.

10.2 Requests that Cannot be Fulfilled

Individuals should be aware that GDPR rights including the right of access is limited to their 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 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).

Avalon 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 any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training, appointment or employment of any individual.

Part of the Data Protection Laws include the "right to be forgotten". However, Avalon School will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing an Individual's (or their child's) personal data: for example, a legal requirement, or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the school still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits

10.3 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 10.6 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.

10.4 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. 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.

10.5 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: for example use of children's photos for media publication.

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 has been requested).

10.6 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 10.5 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 Acceptable Use of IT (inc photographs) and the school behaviour policy. Staff are under professional duties to do the same and also comply with the staff handbook and staff code of conduct.

Section 11 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 Headteacher of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): 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.

Section 12 Queries and Complaints

Complaints about the above procedures should be made to the Headteacher who will decide whether it is appropriate for the complaint to be dealt with in accordance with the school's complaint procedure. Refer to Complains Policy.

Complaints which are not appropriate to be dealt with through the school's complaint procedure can be dealt with by the Information Commissioner, although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator. Contact details of both will be provided with the disclosure information.

Section 13 Contacts, Links and Resources

Further advice and information can be obtained from the Information Commissioner's Office, www.ico.gov.uk

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

ICO latest guidance on Subject Access Requests (SAR):

<https://ico.org.uk/your-data-matters/schools/pupils-info/>

Department of Education's data retention guidance:

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

Section 14

Reviewer and Governing Body Sign-Off

Avalon School will update this policy and privacy notices from time to time. Any substantial changes that affect an individual's rights will be provided directly to them as far as reasonably practicable. This policy will be given to all staff members who must read.

J Callaway, Headteacher

C Kidd, Chair of Governors



AVALON SCHOOL **Privacy Notice**

General Data Protection Regulation (GDPR)

This Privacy Notice has been written to inform parents, pupils and staff of Avalon School about what we do with your personal information. This Notice may be subject to change as the Data Protection Regulations progresses.

Avalon School is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation. Avalon school is a data controller of personal data about past, current and prospective pupils, their parents and guardians as well as data about past, current and prospective staff and third party contractors.

Avalon School holds personal information relating to our pupils and also receives information about them from their previous school, Local Authority (LA) and/or the Department of Education (DfE).

Personal Data Processed by the School

Avalon School collects and processes data about people to enable us to operate as a school. Information in both paper and digital formats is covered by the DPA and GDPR. This includes:

- personal identifiers and contacts (such as name, unique registration number, contact details and address)
- characteristics (such as ethnicity, language, and religion)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (such as educational psychologist reports)
- medical and administration (such as doctors information, child health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as end of key phase assessment data)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- financial information (such as bank details and bursary forms)

Why we collect and use this information

Your personal data (including sensitive personal data, where appropriate) is processed by the School strictly in accordance of the DPA and GDPR. We collect and use pupil information for the following purposes:

- to support teaching and learning
- to monitor and report on pupil attainment progress
- to analyse and publish examination results
- to provide appropriate pastoral care including medical and other sensitive services
- to assess the quality of our services and overall performance
- to communicate
- to understand your needs and provide a better service
- to collect information for national statutory authorities (such Independent Schools Council (ISC), Independent School Association (ISA) and the Independent Schools Inspectorate)

- to promote the schools and its activities (such as events, performances, open days)
- to assess and admit pupils
- to recruit and look after students and staff
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections
- to monitor email communications or internet access to ensure compliance with the school rules and strictly in accordance with our IT Acceptable Use Policy
- and for other reasonable purposes relating to our operation as a school and employer.

Any personal data that we process about our pupils and parents is done so in accordance with Article 6 and Article 9 of GDPR:

Our legal basis for processing your personal data, in line with Article 6(1)(c) include:

- Education Act 1944, 1996, 2002
- Education and Adoption Act 2016
- Education (Information About Individual Pupils)(England) Regulations 2013
- Education (Pupil Information) (England) Regulations 2005
- Education and Skills Act 2008
- Children Act 1989, 2004
- Children and Families Act 2014
- Equality Act 2010
- Education (Special Educational Needs) Regulations 2001

We also process information in accordance with Article 6(e) and Article 9(2)(g) as part of the official authority vested in us as Data Controller and for reasons of substantial public interest. Such processing, which is not mandatory but is considered to be in our pupils' interests, include:

- School trips
- Extra curricular activities

How we collect pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. When we do process this additional information we will ensure that we ask for your consent to process this.

We collect and process pupil and parents information directly from you via Registration Forms, Safeguarding Booklets etc.

We will also process information received from:

- Department for Education (DfE)
- Wirral Education Authority
- Previous schools attended

How we store pupil data

We hold pupil and parent data securely for the set amount of time in accordance with the data retention requirements by the Department of Education and other statutory bodies. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

Who we share pupil data with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our Local Education Authority - Wirral
- the Department for Education (DfE)
- National Health Service bodies

For more information on information sharing with the DfE (including the National Pupil Database and Census) please go to: <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

We will not share any information about you outside the school without your consent unless we have a lawful basis for doing so.

What rights do you have over your data?

Under GDPR parents and pupils have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact Mrs Callaway (Headteacher) on the address provided below:

Mrs Callaway
Headteacher
Avalon School
Caldy Road
West Kirby
Wirral
CH48 2HE
E: jcallaway@avalon-school.co.uk
T: 0151 625 6993

If we cannot resolve your concerns you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the school has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
E: casework@ico.gsi.gov.uk
T: 03031 231 113



AVALON SCHOOL
Privacy Notice - STAFF
General Data Protection Regulation (GDPR)

This Privacy Notice has been written to inform parents, pupils and staff of Avalon School about what we do with your personal information. This Notice may be subject to change as the Data Protection Regulations progresses.

Avalon School is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation. Avalon school is a data controller of personal data about past, current and prospective pupils, their parents and guardians as well as data about past, current and prospective staff and third party contractors.

Avalon School holds personal information relating to our employees and also receives information about them from their previous employer.

Avalon School workforce includes all those employed to teach, or otherwise engaged to work, either on a paid, contracted or voluntary basis at the school.

Personal Data Processed by the School

Avalon School collects and processes data about people to enable us to operate as a school. Information in both paper and digital formats is covered by the DPA and GDPR. This includes:

- personal identifiers and contacts (such as name, teacher number, national insurance number, address history and proof of identity)
- characteristics (such as gender, age and ethnicity)
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- medical information (such as doctors information, health, allergies, medication and dietary requirements)
- qualifications
- photographic records
- financial information (such as bank details and pension details)

Why we collect and use this information

Your personal data (including sensitive personal data, where appropriate) is processed by the School strictly in accordance of the DPA and GDPR. We collect and use employee information for the following purposes:

- to enable individual to be paid
- to facilitate safe recruitment
- to support effective performance management
- to enable the development of a comprehensive picture of the workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to allow better financial modelling and planning
- to provide appropriate pastoral care and wellbeing of the workforce

Staff Privacy Notice

- to communicate
- to understand your needs and provide a better service
- to collect information for national statutory authorities (such Independent Schools Council (ISC), Independent School Association (ISA) and the Independent Schools Inspectorate)
- to promote the schools and its activities (such as events, performances, open days)
- to keep employees safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections
- to monitor email communications or internet access to ensure compliance with the school rules and strictly in accordance with our IT Acceptable Use Policy
- and for other reasonable purposes relating to our operation as a school and employer.

Any personal data that we process about our pupils and parents is done so in accordance with Article 6 and Article 9 of GDPR:

Our legal basis for processing your personal data, in line with Article 6(1)(c) include:

- Education Act 1944, 1996, 2002
- Education and Adoption Act 2016
- Education (Information About Individual Pupils)(England) Regulations 2013
- Education (Pupil Information) (England) Regulations 2005
- Education and Skills Act 2008
- Children Act 1989, 2004
- Children and Families Act 2014
- Equality Act 2010
- Education (Special Educational Needs) Regulations 2001

We also process information in accordance with Article 6(e) and Article 9(2)(g) as part of the official authority vested in us as Data Controller and for reasons of substantial public interest. Such processing, which is not mandatory but is considered to be in our employee's interests, include:

- CPD records

How we collect employee information

Whilst the majority of employee information you provide to us is mandatory, some of it is provided to us on a voluntary basis. When we do process this additional information we will ensure that we ask for your consent to process this.

We collect and process employee information directly from you via Application Forms, Induction Forms, Annual Contact Details Confirmation Forms etc.

We will also process information received from:

- Department for Education (DfE)
- HMRC
- Pension companies and The Pensions Regulator
- Previous employers

How we store employee data

We hold employee data securely for the set amount of time in accordance with the data retention requirements by the Department of Education and other statutory bodies. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

Who we share employee data with

We routinely share pupil information with:

- the Department for Education (DfE)
- HMRC
- Pension companies and The Pension Regulators
- Independent Schools Association
- Independent Schools Inspectorate
- Independent Schools Council
- employers that employees attend after leaving us

We will not share any information about you outside the school without your consent unless we have a lawful basis for doing so.

What rights do you have over your data?

Under GDPR employees have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact Mrs Callaway (Headteacher) on the address provided below:

Mrs Callaway
Headteacher
Avalon School
Caldy Road
West Kirby
Wirral
CH48 2HE
E: icallaway@avalon-school.co.uk
T: 0151 625 6993

If we cannot resolve your concerns you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the school has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
E: casework@ico.gsi.gov.uk
T: 03031 231 113