

Avon House School

Data Protection Policy



Prepared: Summer 2025

To be reviewed: Summer 2026

Review date:	Summer 2025	August 2024	August 2022	August 2021	August 2020
Reviewed by:	ZM	ZM	NB	NB	NB

Data Protection Policy – 2024/25

1. Introduction

Avon House Preparatory School ("the School") is committed to ensuring the protection of all personal information provided by staff, pupils, parents, governors, visitors, contractors and others who come into contact with the School. This policy outlines how we collect, use, store and share personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Responsibilities

All members of the School community have a responsibility to handle personal data in accordance with this policy. The School is the data controller for the purposes of the UK GDPR.

The Data Protection Officer (DPO) is responsible for overseeing the School's compliance with data protection law. The DPO is the Bursar and can be contacted via [insert email address or contact method].

3. Data Protection Principles

We process personal data in accordance with the following principles:

1. **Lawfulness, fairness and transparency:** Data is processed lawfully, fairly and in a transparent manner.
2. **Purpose limitation:** Data is collected for specified, explicit and legitimate purposes.
3. **Data minimisation:** Data is adequate, relevant and limited to what is necessary.
4. **Accuracy:** Data is accurate and kept up to date.
5. **Storage limitation:** Data is kept in a form which permits identification of individuals for no longer than is necessary.
6. **Integrity and confidentiality:** Data is processed securely to ensure appropriate protection.

4. Lawful Basis for Processing Personal Data

We process personal data under one or more of the following lawful bases:

- The data subject has given consent.
- Processing is necessary for the performance of a contract.
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary to protect the vital interests of the data subject or another individual.
- Processing is necessary for the performance of a task carried out in the public interest.
- Processing is necessary for the legitimate interests of the School or a third party, unless overridden by the rights of the data subject.

5. Collecting Personal Data

We collect personal data directly from individuals or from third parties (e.g., local authorities, previous schools, health professionals). This may include:

- Name, address, date of birth
- Contact details
- Academic records
- Health and medical information
- Attendance and behavioural records
- CCTV footage

6. Use of Personal Data

We use personal data for purposes such as:

- Providing education and pastoral care
- Administering admissions and enrolment
- Managing safeguarding and health & safety
- Communicating with parents and carers
- Meeting legal and regulatory obligations

7. Sharing Personal Data

We share data where necessary with:

- Other schools or educational institutions
- Local authorities and regulatory bodies
- The Department for Education (DfE)
- School service providers (e.g., IT, catering, transport)
- Health and social care professionals
- External exam boards

We ensure data is only shared when lawful and necessary. We have agreements in place with data processors to ensure data is handled securely.

8. Security and Storage of Personal Data

We take appropriate technical and organisational measures to protect personal data from loss, misuse, unauthorised access or disclosure. Access to data is restricted to authorised personnel.

Personal data is stored securely, whether electronically or in physical files, and is retained in accordance with the School's Data Retention Schedule and relevant legal timeframes. Once data is no longer needed, it is securely deleted or anonymised.

9. International Data Transfers

Where personal data is transferred outside the UK, we ensure adequate safeguards are in place in accordance with UK GDPR requirements. This may include reliance on adequacy regulations, standard contractual clauses or other approved mechanisms.

10. CCTV

The School uses CCTV for safety, security and monitoring purposes. We do not require consent to use CCTV as it is processed under our legitimate interests to ensure the safety

and security of pupils, staff and visitors. CCTV footage may be disclosed in line with our Data Protection and Safeguarding policies.

11. Subject Access Requests

Individuals have the right to request access to their personal data. Requests should be made in writing to the Head Teacher and include:

- Name and contact details
- Relationship to the School (e.g., pupil, parent, staff member)
- Details of the information requested

The School may require proof of identity before disclosing personal data to ensure requests are legitimate and to protect the rights of individuals. We will respond within one month of receiving a valid request.

12. Other Individual Rights

Under data protection law, individuals also have the following rights:

- To request correction of inaccurate data
- To request erasure of personal data (“right to be forgotten”) in certain circumstances
- To restrict processing
- To object to processing where applicable
- To data portability (in certain limited circumstances)

13. Data Breaches

We have put in place procedures to deal with any suspected personal data breach. In the event of a breach, we will assess the risk to individuals and notify the Information Commissioner’s Office (ICO) within 72 hours if the breach is likely to result in a risk to individuals’ rights and freedoms. Their contact details are available at www.ico.org.uk.

14. Training and Awareness

Staff receive regular training on data protection principles and how to handle data securely. Awareness is also raised among pupils, parents and other stakeholders where appropriate.

15. Complaints and Concerns

If you have any concerns about the way your personal data is being used, please contact the DPO. If you are not satisfied with the School’s response, you have the right to lodge a complaint with the Information Commissioner’s Office at www.ico.org.uk.

16. Review and Monitoring

This policy will be reviewed annually and updated as required to reflect changes in legislation, guidance or practice.