

Data Protection Policy

Effective from: September 2025

Authorised by: Mary Fysh; Principal, Sarah Tapp; Head and Martin Ayres; Chair of Advisory Body

Introduction & Scope

This policy explains how **The Avenue Pre-Preparatory School and Nursery** collects, uses, shares, and protects personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It applies to all personal data of current, past and prospective pupils, their parents/carers/guardians (“parents”), staff, Advisory Body, volunteers, and contractors.

This policy supplements other school policies (e.g. Acceptable Use, Safeguarding, Photography and Images, CCTV) and reflects the Department for Education’s latest guidance (Feb 2023). It applies in addition to the school’s terms and conditions.

2. Data Protection Governance

- **Data Controller:** The school (registered at The Avenue Pre-Preparatory School and Nursery) acts as the Data Controller and is registered with the Information Commissioner’s Office (ICO), Registration Number: Z9595877.
- **Data Protection Officer (DPO):** The School Administrator is appointed as DPO. All data-protection queries, especially those about compliance, rights, or individuals’ data should be directed to the DPO.
- This policy is overseen annually by the senior leadership team and DPO, and forms part of mandatory staff, governor, and volunteer training.

3. Personal Data We Process

Personal data held by the school may include:

- **Identification & Contact Details:** Names, DOB, addresses, phone numbers, emails.
- **School Records:** Admissions, attendance, behaviour, reports, SEN, often including sensitive health information.

- **Financial Data:** Fee payments, bank details, gift aid forms, invoices.
- **Information from Third Parties:** References, educational psychologist reports, medical professionals, and statutory bodies.
- **Images & CCTV:** Photographs and recordings in line with safeguarding and photography policies.
- **Sensitive Personal Data:** Health, religion, ethnicity, criminal convictions, processed only when lawful and, where required, with explicit consent or under statutory duty.

4. How We Lawfully Use Your Data

Personal data is processed only when there is a valid legal basis, such as:

1. **Contractual necessity** – to fulfil obligations under school contracts.
2. **Legal duty** – meeting statutory duties (e.g. admissions, safeguarding).
3. **Public task** – complying with legal and regulatory requirements.
4. **Legitimate interests** – for internal administration, fundraising, or research (subject to balancing tests).
5. **Consent** – for activities like photography, marketing, or sharing personal details outside statutory business.

We process data for:

- Admissions, identity verification, safeguarding, and pupil welfare.
- Delivering education, assessments, SEN support, extracurriculars.
- Communication with parents, awarding bodies, exam boards, and regulatory authorities.
- Publishing exam results and school achievements (with consent where required).
- Marketing, fundraising, and maintaining alumni relations.
- Health, safety, and emergency handling.
- IT and network security in line with our Acceptable Use Policy.

5. Sharing & International Transfers

We may share personal data with:

- Local Authorities, regulators (e.g., Haringey, ISI), healthcare professionals, third-party service providers (e.g. school-trip organisers), examination bodies, finance processors, alumni associations, and fundraising platforms.
- Data transfers outside the UK are permitted only if protected by official mechanisms (e.g., adequacy decisions, Standard Contractual Clauses, Derogations).

6. Retention & Disposal

- Data is stored only as long as necessary for its purpose (e.g., academic records retained until pupil reaches age 25+).
- Imaging, medical files, financial documents, and references follow legal and departmental retention guidance.
- Secure disposal, cross action shredding for physical records, secure deletion for digital data.

7. Rights of Individuals

Under UK GDPR, individuals have rights to:

- **Access** – request a copy of their personal data.
- **Rectification** – correct inaccuracies.
- **Erasure** – request deletion (“right to be forgotten”), subject to exemptions.
- **Restriction** – limit processing in certain circumstances.
- **Portability** – receive data in a structured, machine-readable format.
- **Object** – especially to direct marketing or processing based on legitimate interests.
- **Withdraw consent** – free at any time without affecting earlier processing.

Requests:

- Must be made in writing to the DPO.
- The school will respond within one month (extendable by two months for complex cases).
- A fee of £10 may apply to access requests for parents or former pupils (under UK GDPR).

For pupils under 12, requests are usually made by parents. Pupils aged 12+ may make their own requests if deemed mature to understand the implications.

8. Pupil & Parent Expectations

- Parents are asked to consent to photos, videos, and sharing of their children’s data.
- Sensitive/confidential communications (e.g., pastoral concerns) are kept private unless safeguarding concerns are overridden due to welfare duty.
- Pupils must not share other people's data online. Breaches are subject to disciplinary policy.

9. Data Accuracy & Security

- The school takes reasonable steps to ensure data is accurate, up to date, and relevant.
- Individuals (or parents) must update data via the school office.

- Technical and organisational measures are in place, encryption, secure access, staff training, password policies, audits.
- All staff sign data-protection agreements and receive regular refresher training.

10. Raising Concerns & Complaints

- Queries or concerns can be directed to the DPO in writing (contact via The Company Secretary, The Avenue Pre-Preparatory School and Nursery).
- Unresolved complaints can be escalated via the school's complaints procedure.
- Individuals also have the right to lodge a complaint with the ICO (www.ico.org.uk).

11. Related Policies

This policy should be read in conjunction with:

- Privacy Notices for Pupils, Parents, Staff
- Photography and Images Policy
- Acceptable Use & IT Security Policy
- Safeguarding and Child Protection Policy
- CCTV Policy