

Abbots Hall Primary Academy

GDPR Policy



Agreed by Governors: November 2024

Next Review Date: November 2025

Version control

Date	Version no.	Key changes from previous version
5/2018	V1	New policy
5/2019	V2	Adding DPO details to the policy and privacy statements
2/2/22	V3	Policy name changed from Data Protection Policy to GDPR policy

Abbots Hall Primary Academy Policy on the Rights for Individuals

The Data Protection Act (DPA 2018) came into force on the 25th May 2018 and brings in to place enhanced rights for individuals which includes:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erase
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Below will explain in more detail the rights listed above and how we will comply with those rights.

1. The right to be informed

What information must be supplied?

The regulations set out the information that we need to supply to you and when we need to supply it.

This policy along with our Privacy Page on our website will detail the following information:

- The name and contact details of the Data Controller
Data Controller - is a name given to an organisation that collects and processes personal information about individuals (e.g. you, your child, staff, members of the general public etc.), many organisations are called Data Controllers.

For the purposes of the information held by the school - Abbots Hall Primary Academy (AHPA) are the Data Controller. The full contact details of the school are available on our website: www.abbots-hall.co.uk

- Name and contact details of our Data Protection Officer – Lee Henley – Strategic Lead – Information Governance, Thurrock Council (01375 652500)
- The reason why we hold personal information, what we do with it and what legal reason we have for doing so
- The types of personal information that we hold and use
- The types of organisations we might share the information with
- Where we transfer the information to and if this is outside of the UK
(Do not be alarmed, we do not share any information outside of the UK but if we did we would need to list this on our privacy notice)
- How long we keep your information and why we keep it for that length of time
- What rights you have to gain access your personal information and how to do this
- If you have given us your permission to process your personal information, we will detail how you can remove this if you change your mind
- How you can complain to a supervisory body if you are not happy with how we have dealt with your request
- If you do make a decision to withdraw your permission for us to process your information we will explain to you how this will affect the services we supply to you, or we will explain what we cannot stop processing and why
- If we process your personal information using automated means (using a computer without any human input), we will explain this to you fully
(Please be advised we do not process personal information using automated means but if we did we would need to list this on our privacy notice)

2. Right of Access

What information are you entitled to under the regulations?

Under the regulations, you will have the right to obtain:

- confirmation that your personal information is being processed;

- access to your personal information; and
- other supplementary information – which is the information detailed within our privacy notice on our website www.abbots-hall.co.uk/privacy

How you can access the personal information we hold about you?

When you make a request to us for access to the personal information we hold about you, it is called a Subject Access Request (SAR). You can do this by completing the attached form and supplying at least one form of photographic identification.

In the request you must detail exactly what you would like access to or you can state that you wish to access everything held about you. Most personal information held can be supplied to you, there are some circumstances where the information will not be supplied and this is usually when an exemption applies, these are explained in more detail later on in the policy.

If you are a parent /guardian of a child you can request access to their personal information too as long as you have Parental Rights for the child. Most parents will have parental rights for their child/children unless this has been removed from them by the Local Authority or a Court.

Is there a fee for accessing personal information?

The personal information will be provided free of charge. However, we can charge a 'reasonable fee' if we feel that a request is manifestly unfounded or excessive, particularly if it is repetitive.

We may also charge a reasonable fee if you request further copies of the same personal information at a later date.

How long will it take?

The personal information held will be provided to you as soon as possible and at the latest within one month of receiving it (this is dependent on when the request is received and taking into consideration dates when the school is closed for holidays).

Any requests that are complex or large in volume may take longer and we will aim to supply them within 3 months. We will keep you informed of our progress and if the original one month cannot be met we will advise you of an estimated date of when it will be ready.

Can we refuse your request?

Yes, below are some examples:

- If your request might cause serious harm to the physical or mental health of the pupil or another individual
- Where the individual is at risk of abuse and the disclosed information would not be in their best interests or could compromise statutory investigations
- If your request is manifestly unfounded, excessive or repetitive
- If you are requesting personal information of a child and you do not have parental rights
- If you cannot provide appropriate identification

If we make the decision to refuse your request, we will explain to you why we have made this decision.

If you are unhappy with our decision to refuse your request you can complain to the Information Commissioners Office (who is the appropriate regulatory body), the address is below:

Wycliffe House,
Water Lane,
Wilmslow SK9 5AF
Telephone: 03031231113
www.ico.org.uk

How will the information be provided?

Once we have checked your identity (and in the case of a child that you have parental rights) we will contact you about how you wish to receive the personal information held. If you request the information by email we will provide the information to you in a commonly used electronic format.

What will not be supply?

- We will not provide to you any personal information that contains Legal Advice to or from our solicitors (this is covered by a Legal Professional Privilege exemption).
- We will not provide to you personal information that has been provided to us by the police, or another organisation i.e. A Local Authority, this information can be accessed by making a Subject Access Request direct to the organisation who owns the personal information.
- We will not provide copies of confidential references we have written (i.e. employment references).
- We will not provide personal information to you if we feel that it will cause serious harm to your physical or mental health of that of someone else (this decision will be made based on our professional opinion).
- personal information that consists of educational records or relates to social work.

3. The right to rectification

When should personal information be rectified (changed)?

You have the right to have personal information that we hold about you changed if it is wrong or incomplete.

If we have shared the personal information with another organisation will we notify them that it needs to be updated where necessary.

How long will it take before you change or update my personal information?

We will make the necessary changes within one month (again this is dependent on school opening times).

Any requests that are complicated may take longer and we will aim to make the necessary changes within 3 months. We will keep you informed of our progress and if the original one month cannot be met we will advise you of an estimated date of when it will be complete.

When will the personal information not be changed or updated?

We will not make any changes the personal information we hold if we believe it is factual. If you are able to provide evidence that the facts are incorrect then we will make the necessary changes.

If the personal information held is an opinion of a professional person then this will not be changed. In these circumstances, we will make a note on the record that you have raised your concern and that you disagree with the record.

If you are unhappy about our decision you can complain to the Information Commissioners Office (the details have been supplied earlier in the policy).

4. The right to erasure

When does the right to erasure apply?

The right to erasure is also known as the 'right to be forgotten'. This is not an absolute right. You have a right to request that we erase the personal information that we hold on you and the right to ask that we stop using your personal information in specific circumstances, which includes:

- Where the personal information we hold is no longer necessary in relation to the purpose for which it was originally collected or being used
- When you withdraw your consent
- When you object to the processing and there is no overriding legitimate interest for us to continuing the processing
- The personal information was unlawfully processed (i.e. otherwise in breach of the regulations)
- The personal information has to be erased in order to comply with a legal obligation

- The personal information is processed in relation to the offer of information society services to a child

If we have disclosed your personal information to another organisation, we will inform them about the request for erasure of the personal information, unless it is impossible or involves disproportionate effort to do so.

Can you refuse to comply with a request for erasure?

Yes we can refuse to comply with a request for erasure if the personal information is being used for any of the following reasons:

- to exercise the right of freedom of expression and information
- to comply with a legal obligation for the performance of a public interest task or exercise of official authority
- for public health purposes in the public interest
- archiving purposes in the public interest, scientific research, historical research or statistical purposes; or
- the exercise or defense of a legal claim

5. Right to restrict processing

What is processing?

Any action we take with your personal information from the moment it is collected to the moment it is destroyed is an act of processing, i.e. reading, filling, copying, emailing, posting, sharing etc.

When does the right to restrict processing apply?

You have a right to 'block' or put restrictions on the processing of your personal information in certain circumstances.

If you have requested that we restrict our processing, we are permitted to store the personal information, but not to further process it.

We can keep just enough information about you to make sure that the restriction is respected in future.

We are required to restrict the processing of your personal information in the following circumstances:

- When you advise us that the accuracy of the personal information we hold is wrong, we will restrict our processing until we have checked the accuracy of the information.
- When you have objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether our legitimate grounds override your request.
- When processing is unlawful and the individual opposes erasure and requests restriction instead.
- If we no longer need your personal information but you require the information to establish, exercise or defend a legal claim.

If we have disclosed your personal information to another organisation, we will inform them about the restriction on the processing of your personal information, unless it is impossible or involves disproportionate effort to do so.

We will advise you if or when we decide to lift a restriction on processing.

6. The right to portability

What is portability?

Data portability refers to the ability to move, copy or transfer your personal information easily from one IT environment to another in a safe and secure way, without hindrance to usability. i.e. from one bank to another if you wish to change your account holder.

The right to data portability allows you to obtain and reuse your personal information for your own purposes across different services.

When does the right to data portability apply?

The right to data portability only applies:

- to personal information you have provided to us
- where the processing is based on your consent or for the performance of a contract that you have agreed to; and
- when processing is carried out by automated means

How will we provide your information?

We will provide your personal information in a structured, commonly used and machine readable form. Open formats include CSV files. Machine readable means that the information is structured so that software can extract specific elements of the information. This enables other organisations to use the information with ease.

We will provide the personal information free of charge. If requested we will also transmit the personal information directly to another organisation if this is technically feasible.

If the personal information concerns more than one person(s), we must consider whether providing the information would prejudice the rights of any other person(s).

How long will it take?

We will comply with the request within one month (again this is dependent on school opening times).

Any requests that are complicated or if we receive numerous requests at one time it may take longer and we will aim to make the necessary changes within 3 months. We will keep you informed of our progress and if the original one month cannot be met we will advise you of an estimated date of when it will be complete.

If we are not able to carry out your request we will explain to you the reasons for this. If you are unhappy about our decision you can complain to the Information Commissioners Office (the details have been supplied earlier in the policy).

7. The right to object

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

You must have an objection on “grounds relating to your particular situation”.

We will stop processing your personal information unless:

- we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defense of a legal claim.

Processing for direct marketing

If we are processing your personal information for direct marketing purposes and you object we will stop the processing as soon as possible following receipt of your objection.

Processing for research purposes

If we are processing your personal information for research purposes and you wish to object you must confirm the “grounds relating to your particular situation” in order to exercise this right.

If we are conducting research where the processing of personal information is necessary for the performance of a public interest task, we are not required to comply with an objection to the processing.

How do I comply with the right to object if my processing activities fall into any of the above categories and are carried out online?

If you have an objection to our processing on any of the above categories there will be an online option to notify the school of your objection at www.abbots-hall.co.uk/privacy

Profiling

The regulations has provisions on:

- automated decision-making (making a decision solely by automated means without any human involvement); and
- profiling (automated processing of personal information to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

The regulations apply to all automated decision-making and profiling.

We are permitted to only carry out this type of decision-making where the decision is:

- necessary for the entry into or performance of a contract; or
- authorised by Union or Member state law applicable to the controller; or
- based on your explicit consent.

We must identify to you whether any of your processing falls under Article 22 and, if so, make sure that we:

- give you information about the processing;
- introduce simple ways for you to request human intervention or challenge a decision;
- carry out regular checks to make sure that our systems are working as intended.

What else do we need to consider?

Profiling and automated decision-making is considered to be high-risk. The DPA 2018 requires us to carry out a Data Protection Impact Assessment (DPIA) to show that we have identified and assessed what those risks are and how we will address them.

Subject Access Request Form

1. Who is making this request (please enter your details below in this section):

Title: _____ First Name(s): _____ Surname: _____

Previous Name(s): _____

Home Address: _____

Phone Numbers: _____ Date of Birth: _____

Are you wishing to access your own personal information? Yes / No

If Yes, please move to section 3 of the form.

If No, please complete section 2 of the form.

2. Subjects details (This is the person whose personal information you wish to access, this might be your child/grandchild's information, please enter their details in this section):

Title: _____ First Name(s): _____ Surname: _____

Previous Name(s): _____

Home Address: _____

Phone Numbers: _____ Date of Birth: _____

3. Requested Information (What information do you wish to have copies of? Please list them below):

4. Relationship:

Please confirm your relationship to the Subject of this request?

i.e. Mother/Daughter, Father/Son, Grandparent/Grandson etc

5. Proof of Identity

Which form of photographic identity will you be providing?

6. Releasing the information:

How would you like to receive the information? Please select By email / paper copy

7. Consent:

I understand that in making this request to Abbots Hall Primary Academy they will hold the details of my request and will use the details I have provided. The details I have provided are accurate.

Signature: _____ Date: _____

OFFICE USE ONLY

Date received: _____ Taken by: _____

Digital continuity statement

The purpose and requirements for keeping personal information

Abbots Hall Primary Academy is committed to the protection and security of all information it is required to keep – in some cases this may be beyond a pupil's, staff members or governor's tenancy at the school. In light of this, Abbots Hall Primary Academy is required to keep a digital continuity statement pertaining to computerised information that must be kept for six or more years.

Should the school fail to retain this information, legal action may result in financial penalisation and/or negative press; it is for this reason that the school will retain relevant information for as long as it is required.

The information assets to be covered by the statement

The school understands the sensitivity of some information it is required to keep and ensures measures are in place to secure this information, in accordance with the school's Data Protection (DPA 2018) Policy and the DPA 2018.

To ensure the safety of the information and records, Abbots Hall Primary Academy will not store any personal information on flash drives (memory sticks). Abbots Hall Primary Academy understands the importance and sensitivity of some personal information and sees the use of flash drives as inappropriate due to the fact they can be easy to corrupt, lose or steal. Personal information will be stored on password protected external hard drives.

The individuals responsible for the preservation of personal information

Retention will be overseen by the following personnel:

- Person responsible for the digital continuity strategy, e.g. the headteacher
- Information asset owners

Should the any of the above personnel change, appropriate updates will be made to this and other affected policies and correspondence.

The appropriate supported file formats for long-term preservation, and when they need to be transferred

As agreed with the Computing coordinator, Microsoft Word documents will be converted into PDF files, to ensure the longevity of their accessibility – file formats should be converted as soon as possible, or within six months, to ensure their compatibility. Further specifications of file conversion are listed below:

Type of file	To be converted to
Microsoft Word document	PDF
Microsoft PowerPoint document	PDF
Microsoft Excel document	PDF
Images	JPEG
Videos and film, including CCTV	MOV/MP4

The retention of all software specification information and licence information

If it is not possible for the information created by an unsupported computer system to be converted to the supported file formats, the system itself should be 'mothballed' to preserve the files it has stored. If this is the case with any information, Abbots Hall Primary Academy will list the complete system specification for the software that has been used and any licence information which will allow the system to be retained in its entirety.

Personal information will be stored on password protected external hard drives, which will be kept in a locked filing cabinet – only the information asset owners and the Headteacher will have knowledge of these passwords

How access to the information asset is to be managed in accordance with the DPA 2018

To ensure the information is relevant to the school, and that recent files have been correctly converted, information asset owners will undertake regular archive checks of the information stored – timeframes are listed in the table below. In accordance with principle five of the DPA 2018, personal information should be “kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal information are processed”. Abbots Hall Primary Academy is committed to ensuring all personal information is checked regularly to ensure its relevance.

Timeframe	Type of check
Biannually	Relevance check
Annually	Compatibility check and, if required, back-up files created
At the end of the data’s lifecycle (at least every six years)	Check to ensure data is securely disposed of

DPA 2018 privacy notice for pupils

You go to school at Abbots Hall Primary Academy. To help the school teach you what you need to learn and to keep you safe the teachers need to keep some important information about you.

The sort of information they have to hold is:

- Your name – so they know which child is which
- Your address – so they can send letters home to your parents
- Your home telephone number – so they can call home if there is an emergency or to check why you are not in school if they are worried about you
- Your birthday – so they can make sure you are in the right class for your age
- Your parents or carers names – so they make sure they speak to the right adults about you for example on parents evening

Other information the teachers will need know is whether you are taking any medicine – so that they can keep you safe in school. The teachers will make sure the medication has your name on it and is only given to you when it's needed.

The school have to let you know what important information we hold about you and tell you how we will keep your important information safe. We won't share your important information with anyone else unless we have to.

When we hold your important information in school we might use it in many different ways. We might add it to the computers used in the office, we print it out for the class teacher, we might share it with other important organisations.

If you ever want to see the information we have about you, you can ask your class teacher, or you can ask your parent/carer to ask for you. It might take quite a while for us to get you your information it could be up to 1 month (about 30 days).

If once you have seen what important personal information we hold about you and you think we have got something wrong, you can ask us to change it and put it right. We will always try to keep the information we have about you safe.

Lee Henley – Strategic Lead – Information Governance, Thurrock Council is the data protection officer. Their role is to oversee and monitor how the school manage and process your information. If you have any worries or concerns about how your personal information is being used please contact this individual on **01375 652500**.

DPA 2018 privacy notice for pupils and their families

What information do we collect and why?

Abbots Hall Primary Academy collect and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and/or the Department for Education (DfE).

We collect and use personal information in order to meet legal requirements and legitimate interests set out in the DPA 2018 and UK law, including those in relation to the following:

- Article 6 and Article 9 of the DPA 2018
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

This information will include;

- their contact details
- national curriculum assessment results,
- attendance information,
- pastoral information,
- any exclusion information,
- where they go after they leave us,
- personal characteristics such as their ethnic group,
- any special educational needs,
- relevant medical information,
- CCTV systems to monitor and collect visual images for security and the prevention of crime.

Why we collect and use this information

We use this personal information to;

- safeguard pupils
- support our pupils' learning
- monitor and report on their progress
- provide appropriate pastoral care; and
- assess the quality of our service
- to comply with the law regarding personal information

Collecting 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. In order to comply with the Data Protection Regulations, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Statutory Data collection requirements:

We are required, by law, to pass certain information about our pupils to our local authority (LA) and the Department for Education (DfE).

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- our local authority
- the Department for Education (DfE)

We hold personal pupil information for the duration of the time children are with us and we hold assessment information for a further 7 years. We will not give information about our pupils to anyone without your consent unless the law and our policies allow us to do so.

The National Pupil Database (NDP)

The NDP is owned and managed by the DfE and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013. To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

Personal Information shared by the DfE

DfE may also share pupil level personal information that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the Data Protection Act 1998.

Decisions on whether DfE releases this personal information to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the information, the purpose for which it is required, the level and sensitivity of information requested and the arrangements in place to store and handle the information. To be granted access to pupil level information, requestors must comply with strict terms and conditions covering the confidentiality and handling of information, security arrangements and retention and use of the information.

For more information on how this sharing process works, please visit: <https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information on which third party organisations (and for which project) pupil level information has been provided to, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- Thurrock LA <https://www.thurrock.gov.uk/school-data-protection-and-your-privacy/data-we-collect>; and
- DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Requesting access to your personal information

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, please contact us via the school office.

You also have the right to:

- object to processing of personal information that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal information rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal information, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

DPA 2018 privacy notice for the school workforce

Who processes your information?

The school is the data controller of the personal information you provide to us. This means they determine the purposes for which, and the manner in which, any personal information relating to staff is to be processed. A representative of the school, Mrs James, can be contacted on 01375 673188 or admin@abbotshall.thurrock.sch.uk

Lee Henley – Strategic Lead – Information Governance, Thurrock Council is the data protection officer. Their role is to oversee and monitor the school's processing practices. This individual can be contacted on 01375 652500.

Where necessary, third parties may be responsible for processing staff members' personal information. Where this is required, the school places data protection requirements on third party processors to ensure the personal information is processed in line staff members' privacy rights.

Why do we need your information?

Abbots Hall Primary Academy has the legal right and a legitimate interest to collect and process personal information relating to those we employ to work at the school, or those otherwise contracted to work at the school. We process personal information in order to meet the safeguarding requirements set out in UK employment and childcare law, including those in relation to the following:

- Academy Funding Agreement
- Academy's legal framework
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009
- Keeping Children Safe in Education 2018

Staff members' personal information is also processed to assist in the running of the school, and to enable individuals to be paid.

If staff members fail to provide their personal information, there may be significant consequences. This includes the following:

- Failure to complete statutory checks will lead to termination of the employment contract;
- Failure to provide the school with ample proof of a right to work in the UK will prevent employment at name of school. Employees found to be working illegally could face prosecution by law enforcement officers.
- Without personal details (including your bank details and billing address) the school will not be able to pay salaries;
- Failure to provide accurate tax codes and/or national insurance numbers could lead to issues of delayed payments or an employee paying too much tax.

For which purposes are your personal information processed?

In accordance with the above, staff members' personal information is used for the following reasons:

- Contractual requirements
- Employment checks, e.g. right to work in the UK
- Salary requirements

Which personal information is collected?

The personal information the school will collect from the school workforce includes the following:

- Names
- National insurance numbers
- Characteristics such as ethnic group
- Employment contracts
- Remuneration details
- Qualifications
- Absence information

[NB. The above list is exhaustive]

The collection of personal information will benefit both the DfE and LA by:

- Improving the management of workforce information across the sector.
- Enabling the development of a comprehensive picture of the workforce and how it is deployed.
- Informing the development of recruitment and retention policies.
- Allowing better financial modelling and planning.
- Enabling ethnicity and disability monitoring.
- Supporting the work of the school teachers' review body.

Will your personal information be sought from third parties?

Staff members' personal information is only sought from the subject themselves. No third parties will be contacted to obtain staff members' personal information without their consent.

Staff members' personal information may be obtained and processed from third parties where the law requires the school to do so, e.g. medical records from a GP. The categories of information obtained and processed from third parties include:

- Teacher reference numbers
- Payroll information
- HR information

Where information is obtained from third parties, the personal information originates from the following sources:

- List 99 Checks
- DBS Certificate
- Records relating to appointments
- Evidence to work in the UK
- Previous Child Protection allegation (proven/unproven)
- Disciplinary outcomes

How is your information shared?

Abbots Hall Primary Academy will not share your personal information with any third parties without your consent, unless the law allows us to do so.

We are required, by law, to pass on some personal information to our LA and the DfE. This includes the following:

- Teacher reference numbers
- Payroll information
- HR information
- List 99 Checks
- DBS Certificate

How long is your information retained for?

Staff members' personal information is retained in line with Abbots Hall Primary Academy's Records Management Policy.

Personal information may be retained for the following periods depending on the nature of the information. Information will only be retained for as long as is necessary to fulfil the purposes for which it was processed, and will not be retained indefinitely.

If you require further information regarding retention of your information, and the periods for which it is held for, please download our [Records Management Policy](#).

What are your rights?

As the data subject, you have specific rights to the processing of your personal information.

You have a legal right to:

- Request access to the personal information that Abbots Hall Primary Academy holds.
- Request that your personal information is amended.
- Request that your personal information is erased.
- Request that the processing of your personal information is restricted.

Where the processing of your personal information is based on your explicit consent, you have the right to withdraw this consent at any time. This will not affect any personal information that has been processed prior to withdrawing consent.

Staff members also have the right to lodge a complaint with the Information Commissioner's Office (ICO) in relation to how Abbots Hall Primary Academy processes their personal information.

How can you find out more information?

If you require further information about how we and/or the DfE store and use your personal information, please visit our website, [school website link](#), the Gov.UK [website](#), or download our [DPA 2018 Data Protection Policy](#) and [Records Management Policy](#).

Declaration

I, name of staff member, declare that I understand:

- Abbots Hall Primary Academy has a legal and legitimate interest to collect and process my personal information in order to meet statutory and contractual requirements.
- There may be significant consequences if I fail to provide the personal information Abbots Hall Primary Academy requires.
- Abbots Hall Primary Academy may share my personal information with the DfE, and subsequently the LA.
- Abbots Hall Primary Academy will not share my personal information to any other third parties without my consent, unless the law requires the school to do so.
- The nature and personal categories of this information, and where the personal information originates from, where my information is obtained from third parties.
- My personal information is retained in line with Abbots Hall Primary Academy's Records Management Policy.
- My rights to the processing of my personal information.

Name of staff member: _____

Signature of staff member: _____

Date: _____

DPA 2018 privacy notice for third parties

Who processes your information?

The school is the data controller, and they control any personal information that is provided. This means they determine the purposes for, and the manner, in which any personal information relating to third parties is processed.

Lee Henley – Strategic Lead – Information Governance, Thurrock Council is the data protection officer (DPO). Their role is to oversee and monitor the school's data processing practices. This individual can be contacted on **01375 652500** if you have any queries pertaining to how the school processes personal information.

Where necessary, third parties may be responsible for processing any personal information you provide. Where this is required, the school places data protection requirements on third-party processors to ensure personal information is processed in line with your privacy rights – the school is bound to the same requirements as third parties to ensure the security of personal information.

Why do we need your information?

Abbots Hall Primary Academy has the legal right and a legitimate interest to collect and process personal information relating to those contracted to work at the school. The school processes personal information in order to meet the statutory safeguarding requirements set out in UK employment and childcare law, including those in relation to the following:

- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009
- Keeping Children Safe in Education 2018

Third parties' personal information is also processed to assist in the running of the school, and to enable individuals and organisations to be paid.

If third parties fail to provide their personal information, there may be significant consequences. This includes the following:

- Failure to provide the school with ample proof of a right to work in the UK will prevent hire at name of school.
- Third party companies or individuals found to be working illegally could face prosecution by law enforcement officers.
- Failure to provide accurate tax codes and/or national insurance numbers could lead to issues of delayed payments.

For which purposes are your personal information processed?

In accordance with the above, third parties' personal information is used for the following reasons:

- Contractual requirements
- Employment checks, e.g. right to work in the UK
- Salary requirements

What information is collected?

The personal information the school will collect from third parties' includes the following:

- Name of organisation
- Contact information of organisation
- Name of point-of-contact
- Contractual agreements
- Remuneration details

The collection of personal information from third parties will benefit the school by:

- Improving the management of third-party information.
- Enabling the development of a comprehensive picture of the third parties used and how they are deployed.
- Informing the development of contracts and retention policies.
- Allowing better internal financial modelling and planning.

Will your personal information be sought from third parties?

Third parties' personal information is only sought from the data subject. No third parties will be contacted to obtain third parties' personal information without the data subject's consent.

Personal information may be obtained and processed from other third parties where the law requires the school to do so, e.g. payment information. The categories of information obtained and processed from third parties include:

- References
- Proof of ID

Where information is obtained from third parties, the personal information originates from the following sources:

- List 99 Checks
- DBS Certificate
- Records relating to appointments/references
- Evidence to work in the UK
- Previous Child Protection allegation (proven/unproven)

How is your information shared?

Abbots Hall Primary Academy will not share your personal information with any other third parties without your consent, unless the law allows us to do so.

How long is your information retained for?

Third party personal information is retained in line with the school's Records Management Policy.

Personal information may be retained for the different periods of time depending on the nature of the information. Information will only be retained for as long as is necessary to fulfil the purposes for which it was processed, and will not be retained indefinitely if there is no such need for it to be.

If you require further information regarding retention of information, and the periods for which your personal information is held for, please download our Records Management Policy from the school website or contact our DPO for a copy.

What are your rights?

As the data subject, you have specific rights to the processing of your information.

You have a legal right to:

- Request access to the personal information that Abbots Hall Primary Academy holds.
- Request that your personal information is amended.
- Request that your personal information is erased.
- Request that the processing of your information is restricted.
- Request to obtain and reuse your personal information for your own purposes across different services
- Object to your consent being obtained
- Request that your personal information is collected using automated processing

Where the processing of your information is based on your explicit consent, you have the right to withdraw this at any time. This will not affect any personal information that has been processed prior to withdrawing consent. You can withdraw consent by initially informing your immediate line manager.

Third parties also have the right to lodge a complaint with the ICO in relation to how Abbots Hall Primary Academy processes their personal information. If a third party wishes to make a complaint to the ICO, they can do so on the ICO's website or they can call their helpline on 0303 123 1113.

How can you find out more information?

If you require further information about how we store and use your personal information, please visit our website, www.abbots-hall.co.uk/privacy. You will also be able to download our DPA 2018 Data Protection Policy and Records Management Policy from here as well. These policies are available in printed form upon request by contacting our DPO.

Declaration

I, **name of person-of-contact for third parties**, declare that I understand:

- Abbots Hall Primary Academy has a legal and legitimate interest to collect and process my personal information in order to meet statutory and contractual requirements.
- There may be significant consequences if I fail to provide the personal information Abbots Hall Primary Academy requires.
- Abbots Hall Primary Academy will not share my information to any other third parties without my consent, unless the law requires the school to do so.
- The nature and personal categories of this information, and where the personal information originates from, where my information is obtained from third parties.
- My information is retained in line with Abbots Hall Primary Academy's Records Management Policy.
- My rights to the processing of my personal information.

Name of company: _____

Name of person-of-contact: _____

Signature of person-of-contact: _____

Date: _____

DPA 2018 privacy notice for Volunteers

Who processes your information?

When a volunteer begins work at the school, regardless of the time they'll spend at the school, there are certain processes the school needs to follow, e.g. to ensure the volunteer has passed all the relevant checks. This privacy notice informs volunteers how the school intends to collect, use, process and store their information.

The school is the data controller of the personal information you provide to us. This means they determine the purposes for which, and the manner in which, any personal information relating to any volunteer is to be processed. A representative of the school, Miss Fishleigh, can be contacted on 01375 673188 or email admin@abbotshall.thurrock.sch.uk

Lee Henley – Strategic Lead – Information Governance, Thurrock Council is the data protection officer (DPO). Their role is to oversee and monitor the school's data processing practices. This individual can be contacted on **01375 652500** if you have any queries pertaining to how the school processes information.

Where necessary, third parties may be responsible for processing volunteers' personal information. Where this is required, the school places data protection requirements on third party processors to ensure information is processed in line with volunteers' privacy rights.

Why do we need your information?

Abbots Hall Primary Academy has the legal right and a legitimate interest to collect and process personal information relating to volunteers we employ to work at the school. We process personal information in order to meet the safeguarding requirements set out in UK employment and childcare law, including those in relation to the following:

- Academy Funding Agreement
- Academy's legal framework
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009
- Keeping Children Safe in Education 2018
- Working Together to Safeguard Children 2015

Volunteers will have their personal information processed to assist in the running of the school and, where necessary, enable individuals to be paid expenses, e.g. for travel (where necessary).

If volunteers fail to provide their personal information, there may be significant consequences, including, but not limited to:

- Failure to complete statutory checks will lead to termination of the voluntary position;
- Failure to pass a full DBS check will prevent volunteers from undertaking work at this school.
- Volunteers found to be working illegally could face prosecution by law enforcement officers
- Failure to provide the school with the relevant information may compromise your cover under the school's insurance policy.

For which purposes are your personal information processed?

In accordance with the above, personal information pertaining to volunteers is used for the following reasons:

- To ensure volunteers can be covered by the school's public liability insurance
- Adding information, e.g. DBS checks, to the Single Central Record
- Expense requirements

What information is collected?

The personal information the school will collect from volunteers includes the following:

- Name
- Phone number
- Address
- Relevant volunteering or employment history
- References
- Remuneration details, where necessary
- Any relevant qualifications, e.g. relating to safeguarding

- Employment checks, e.g. right to work in the UK and DBS checks

The collection of personal information will benefit the LA by:

- Informing the development of the school's Staff and Volunteer Handbook.
- Allowing better financial modelling and planning.
- Enabling ethnicity and disability monitoring.

Will your personal information be sought from third parties?

Personal information is only sought from the data subject. No third parties will be contacted to obtain personal information pertaining to volunteers without the data subject's consent.

Volunteers' personal information may be obtained and processed from third parties where the law requires the school to do so, e.g. for the purpose of DBS checks. The categories of information obtained and processed from third parties include:

- References
- Proof of ID

Where information is obtained from third parties, the personal information originates from the following sources:

- List 99 Checks
- DBS Certificate
- Records relating to appointments/references
- Evidence to work in the UK
- Previous Child Protection allegation (proven/unproven)

How is your information shared?

Abbots Hall Primary Academy will not share your personal information with any third parties without your consent, unless the law allows us to do so.

How long is your information retained for?

Personal information is retained in line with Abbots Hall Primary Academy's Records Management Policy.

Personal information may be retained for varying periods of time depending on the nature of the information; you will be informed on how long your information will be obtained by the school. Information will only be retained for as long as is necessary to fulfil the purposes for which it was processed and will not be retained indefinitely if there is no such reason for it to be.

Once your information has served its purpose, it will be disposed of in line with the procedure outlined in the school's Records Management Policy.

If you require further information regarding the retention of information, and the periods for which your personal information is held for, please download our DPA 2018 Compliant Records Management Policy from the school website or contact our DPO for a copy.

What are your rights?

As the data subject, you have specific rights to the processing of your information.

You have a legal right to:

- Request access to the personal information that Abbots Hall Primary Academy holds.
- Request that your personal information is amended.
- Request that your personal information is erased.
- Request that the processing of your information is restricted.
- Request to obtain and reuse your personal information for your own purposes across different services.
- Object to your consent being obtained.
- Request that your personal information is collected using automated processing.

Where the processing of your information is based on your explicit consent, you have the right to withdraw this consent at any time. This will not affect any personal information that has been processed prior to withdrawing consent. You can withdraw consent by informing Miss May.

You also have the right to lodge a complaint with the ICO in relation to how Abbots Hall Primary Academy processes your personal information. If you wish to make a complaint to the ICO, you can do so on the ICO's website or call their helpline on 0303 123 1113.

How can you find out more information?

If you require further information about how we store and use your personal information, please visit our website, [http://www.abbots-hall.co.uk/DPA 2018-privacy-notices](http://www.abbots-hall.co.uk/DPA%202018-privacy-notices), where you can download our Data Protection DPA 2018 Policy and Records Management Policy.

Declaration

I, name of volunteer, declare that I understand:

- Abbots Hall Primary Academy has a legal and legitimate interest to collect and process my personal information in order to meet statutory and contractual requirements.
- There may be significant consequences if I fail to provide the personal information Abbots Hall Primary Academy requires.
- Abbots Hall Primary Academy may share my information with the LA.
- Abbots Hall Primary Academy will not share my information to any other third parties without my consent, unless the law requires the school to do so.
- The nature and personal categories of this information, and where the personal information originates from, where my information is obtained from third parties.
- My information is retained in line with Abbots Hall Primary Academy's Records Management Policy.
- My rights to the processing of my personal information.

Name of volunteer:

Signature of volunteer:

Date:
