



PRIVACY NOTICES

February 2026

These Privacy Notices explain how Newcastle School for Boys processes personal data in accordance with the UK GDPR and Data Protection Act 2018. They set out what data we collect, why we collect it, our lawful bases, who we share it with, retention periods, your rights, and how to raise concerns.

1. PUPIL PRIVACY NOTICE

1.1 Data Controller & Contacts

Controller: Newcastle School for Boys.

Designated Data Protection Lead (DPL): Chief Operating Officer -
bursar@newcastleschool.co.uk

ICO Registration Number: Z9521438

You may raise concerns with the Information Commissioner's Office (ICO):
www.ico.org.uk or 0303 123 1113

1.2 What this notice is for

This notice explains how the School collects, uses and shares personal data about pupils, and their rights under the UK GDPR and the Data Protection Act 2018.

1.3 Categories of personal data we process

- Contact and identity details; identifiers; date of birth
- Admissions and assessment information; prior school reports
- Academic records, test/ exam results and reports
- Attendance, behaviour and exclusions
- Pastoral and safeguarding records (including low-level concerns where appropriate)
- SEND and medical information
- Images (including CCTV, still and moving images) per our Images policy
- ICT usage data, logs and filtering

1.4 Why we use this data

- Provide education, monitor progress and plan support (including SEND)
- Deliver pastoral care and fulfil safeguarding duties (including compliance with KCSIE requirements)
- Meet legal obligations (e.g., attendance, census, health & safety)
- Administer examinations, trips and activities
- Ensure safe and appropriate use of IT systems

- Promote achievements and school activity where permitted
- Where we provide online services likely to be accessed by children, we take account of children's higher protection matters including age-appropriate design and transparency

1.5 Our lawful bases

- Public task / public interest (education, safeguarding)
- Legal obligation (e.g., safeguarding, attendance, DfE returns)
- Contract (parent contract)
- Legitimate interests (school management and security)
- Consent (specific, optional uses such as certain images). You may withdraw consent at any time; this will not affect prior lawful processing.

Where we rely on Recognised Legitimate Interests (RLI) under Article 6(1)(ea), these purposes are pre-approved in UK law and do not require a balancing test e.g. safeguarding vulnerable individuals and responding to emergencies. We still ensure that processing is necessary for the stated purpose.

1.6 Special category /criminal data

Processed under substantial public interest (safeguarding), provision of education and welfare, vital interests, or explicit consent where required.

1.7 Where your data comes from

Directly from you or your parents/carers; previous schools; local authorities; health and safeguarding professionals.

1.8 Who we share data with

Exam boards; local authority safeguarding partners; police or other agencies where legally required; health professionals; IT and cloud-service providers acting under contract. Other schools (if references are requested).

In line with Keeping Children Safe in Education (KCSIE), we may record and share safeguarding information even where concerns are not yet substantiated, where this is necessary to protect pupils' welfare or meet legal duties.

1.9 International transfers

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place to protect it in accordance with UK GDPR requirements. These safeguards may include:

- UK adequacy regulations, where the destination country has been formally assessed as providing an adequate level of protection;
- The International Data Transfer Agreement (IDTA) or
- The UK Addendum to the EU Standard Contractual Clauses, where adequacy does not apply;
- Transfer Risk Assessments (TRA) to evaluate any additional risks associated with the transfer; and
- Technical and organisational measures, such as encryption, access controls, data minimisation, and secure transfer protocols.

We apply these safeguards to ensure that personal data continues to benefit from a level of protection essentially equivalent to that provided in the UK.

1.10 How long we keep data

We retain personal data in accordance with statutory requirements, safeguarding obligations, legal limitation periods and the IRMS Retention Schedule. Detailed retention criteria and retention periods are available in our full Retention Schedule.

1.11 Your rights and complaints

You have rights of access, rectification, erasure, restriction, portability and objection (subject to legal limitations, particularly for safeguarding and regulatory duties).

Some rights apply only in certain circumstances. Where we cannot comply with a request (for example due to safeguarding obligations, legal obligations, or statutory exemptions), we will explain the reasons.

If you make an access request, we will carry out reasonable and proportionate searches. If we need clarification, we may stop the clock until you provide the requested information.

If you are unhappy with how we use your data, please contact the DPL. We operate an internal data protection complaints procedure and will respond within the required timeframe. You also have the right to complain to the ICO.

1.12 Automated decision-making

We do not make decisions about you based solely on automated processing. We may use age-appropriate filtering/monitoring to meet safeguarding and network security duties.

1.13 Whether providing data is required

Some information is required by law or necessary to deliver education and safeguarding. Where information is optional, we will make this clear at the point of collection.

2. PARENT / CARER PRIVACY NOTICE

2.1 Data Controller & Contacts

Controller: Newcastle School for Boys
Designated Data Protection Lead (DPL): Chief Operating Officer -
bursar@newcastleschool.co.uk
ICO Registration Number: Z9521438

You may raise concerns with the Information Commissioner's Office (ICO):
www.ico.org.uk or 0303 123 1113

2.2 What this notice is for

This notice explains how the School collects, uses and shares personal data about parent / carers, and their rights under the UK GDPR and the Data Protection Act 2018.

2.3 Categories of personal data we process

- Contact and identity details, parental responsibility and court orders
- Communications with the School
- Financial details where relevant (fees, payments, job title)
- Information relating to safeguarding and site access (including CCTV if relevant)

2.4 Why we use this data

- Communicate about pupil progress, attendance and welfare
- Administer billing, payments and services
- Support safeguarding and pastoral care
- Enable participation in events and activities
- Ensure visitor and site security

2.5 Our lawful bases

Legal obligation; Contract; Public task (education and safeguarding); Legitimate interests (communication and school management); Consent (marketing/optional uses).

You may withdraw consent at any time; this will not affect prior lawful processing.

Where we rely on Recognised Legitimate Interests (RLI) under Article 6(1)(ea), these purposes are pre-approved in UK law and do not require a balancing test e.g. safeguarding vulnerable individuals and responding to emergencies. We still ensure that processing is necessary for the stated purpose.

2.6 Where your data comes from

Directly from you; from your child; from previous schools or agencies where relevant. We may receive personal data from third parties, for example previous schools, local authorities, the police, the Disclosure and Barring Service, health or safeguarding professionals, or publicly available sources (as applicable).

2.7 Who we share data with

Local authorities safeguarding partners; DfE; police and safeguarding partners; IT service providers; financial providers (e.g., banks, card processors).

In line with Keeping Children Safe in Education (KCSIE), we may record and share safeguarding information even where concerns are not yet substantiated, where this is necessary to protect pupils' welfare or meet legal duties.

2.8 International transfers

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place to protect it in accordance with UK GDPR requirements.

These safeguards may include:

- UK adequacy regulations, where the destination country has been formally assessed as providing an adequate level of protection;
- The International Data Transfer Agreement (IDTA) or
- The UK Addendum to the EU Standard Contractual Clauses, where adequacy does not apply;
- Transfer Risk Assessments (TRA) to evaluate any additional risks associated with the transfer; and
- Technical and organisational measures, such as encryption, access controls, data minimisation, and secure transfer protocols.

We apply these safeguards to ensure that personal data continues to benefit from a level of protection essentially equivalent to that provided in the UK.

2.9 How long we keep data

We retain personal data in accordance with statutory requirements, safeguarding obligations, legal limitation periods and the IRMS Retention Schedule. Detailed retention criteria and retention periods are available in our full Retention Schedule.

2.10 Your rights and complaints

You have rights of access, rectification, erasure, restriction, portability and objection (subject to legal limitations, particularly for safeguarding and regulatory duties).

Some rights apply only in certain circumstances. Where we cannot comply with a request (for example due to safeguarding obligations, legal obligations, or statutory exemptions), we will explain the reasons.

If you make an access request, we will carry out reasonable and proportionate searches. If we need clarification, we may stop the clock until you provide the requested information.

If you are unhappy with how we use your data, please contact the DPL. We operate an internal data protection complaints procedure and will respond within the required timeframe. You also have the right to complain to the ICO

2.11 Automated decision-making

We do not make decisions about you based solely on automated processing. We may use appropriate filtering/monitoring of IT systems to meet safeguarding and security duties.

2.12 Whether providing data is required

Some information is mandatory (required by law, contract, or to deliver education/safeguarding). Where information is optional, we will make this clear at the point of collection and explain any consequences of not providing it.

3. STAFF PRIVACY NOTICE

3.1 **Data Controller & Contacts**

Controller: Newcastle School for Boys
Designated Data Protection Lead (DPL): Chief Operating Officer -
bursar@newcastleschool.co.uk
ICO Registration Number: Z9521438

You may raise concerns with the Information Commissioner's Office (ICO):
www.ico.org.uk or 0303 123 1113

3.2 **What this notice is for**

This notice explains how the School collects, uses and shares personal data about Staff, and their rights under the UK GDPR and the Data Protection Act 2018. This notice also applies to individuals not employed by the school but who regularly engage with our pupils e.g. peripatetic teachers / catering staff.

3.3 **Categories of personal data we process**

- Contact and identity details; employment history and qualifications
- Contracts, payroll, tax and pension data
- DBS and safeguarding checks
- Safer recruitment information (references, employment history checks, and pre-employment vetting)
- Performance, training and appraisal data
- Absence and sickness records
- ICT usage logs (monitoring for security/safeguarding)

3.4 **Why we use this data**

Safe recruitment and safeguarding; payroll and benefits; performance and training; legal and regulatory reporting (e.g., HMRC, pensions); IT security and acceptable use.

3.5 **Our lawful bases**

Contract; Legal obligation; Public task (education/safeguarding); Legitimate interests (workforce management); Consent where appropriate.

You may withdraw consent at any time; this will not affect prior lawful processing.

Where we rely on Recognised Legitimate Interests (RLI) under Article 6(1)(ea), these purposes are pre-approved in UK law and do not require a balancing test e.g. safeguarding vulnerable individuals and responding to emergencies. We still ensure that processing is necessary for the stated purpose.

3.6 **Special category/criminal data**

Processed under employment law, safeguarding requirements, public interest and, where necessary, vital interests.

3.7 Where your data comes from

Directly from you; referees; DBS; previous employers; professional bodies.

3.8 Who we share data with

DBS; HMRC; pension and payroll providers; IT service providers; regulators where required.

In line with Keeping Children Safe in Education (KCSIE), we may record and share safeguarding information even where concerns are not yet substantiated, where this is necessary to protect pupils' welfare or meet legal duties.

3.9 International transfers

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place to protect it in accordance with UK GDPR requirements.

These safeguards may include:

- UK adequacy regulations, where the destination country has been formally assessed as providing an adequate level of protection;
- The International Data Transfer Agreement (IDTA) or
- The UK Addendum to the EU Standard Contractual Clauses, where adequacy does not apply;
- Transfer Risk Assessments (TRA) to evaluate any additional risks associated with the transfer; and
- Technical and organisational measures, such as encryption, access controls, data minimisation, and secure transfer protocols.

We apply these safeguards to ensure that personal data continues to benefit from a level of protection essentially equivalent to that provided in the UK.

3.10 How long we keep data

Personnel files typically retained for at least 7 years after employment ends (longer where safeguarding applies). Detailed retention criteria and retention periods are available in our full Retention Schedule.

3.11 Your rights and complaints

You have rights of access, rectification, erasure, restriction, portability and objection (subject to legal limitations, particularly for safeguarding and regulatory duties).

Some rights apply only in certain circumstances. Where we cannot comply with a request (for example due to safeguarding obligations, legal obligations, or statutory exemptions), we will explain the reasons.

If you make an access request, we will carry out reasonable and proportionate searches. If we need clarification, we may stop the clock until you provide the requested information.

If you are unhappy with how we use your data, please contact the DPL. We operate an internal data protection complaints procedure and will respond within the required timeframe. You also have the right to complain to the ICO.

3.12 Automated decision-making

We do not make decisions about you based solely on automated processing. We may use appropriate filtering/monitoring of IT systems to meet safeguarding and security duties.

3.13 Whether providing data is required

Some information is mandatory (required by law, contract, or to deliver education/safeguarding). Where information is optional, we will make this clear at the point of collection and explain any consequences of not providing it.

4. GOVERNORS / PROPRIETORS / VOLUNTEERS PRIVACY NOTICE

4.1 Data Controller & Contacts

Controller: Newcastle School for Boys
Designated Data Protection Lead (DPL): Chief Operating Officer -
bursar@newcastleschool.co.uk
ICO Registration Number: Z9521438

You may raise concerns with the Information Commissioner's Office (ICO):
www.ico.org.uk or 0303 123 1113

4.2 What this notice is for

This notice explains how the School collects, uses and shares personal data about Governors / Proprietors / Volunteers, and their rights under the UK GDPR and the Data Protection Act 2018.

4.3 Categories of personal data we process

- Contact and identity details;
- Qualifications and references
- Employment history (where relevant)
- Declarations of interest
- DBS and safeguarding checks
- ICT usage logs (if applicable).

4.4 Why we use this data

Establish and maintain governance; meet statutory publication/record duties; safe recruitment and safeguarding; provide secure access to systems and site.

4.5 Our lawful bases

Public task (governance/safeguarding); Legal obligation; Legitimate interests (school management and administration); Consent for optional uses.

You may withdraw consent at any time; this will not affect prior lawful processing.

Where we rely on Recognised Legitimate Interests (RLI) under Article 6(1)(ea), these purposes are pre-approved in UK law and do not require a balancing test e.g. safeguarding vulnerable individuals and responding to emergencies. We still ensure that processing is necessary for the stated purpose.

4.6 Where your data comes from

Directly from you; referees; DBS; Companies House or public sources (for trustees where applicable). We may receive personal data from third parties, for example previous schools, local authorities, the police, the Disclosure and Barring Service, health or safeguarding professionals, or publicly available sources (as applicable).

4.7 Who we share data with

DfE/ governance directories where required (e.g. Companies House / Charities Commission); safeguarding agencies; professional advisers; IT service providers.

In line with Keeping Children Safe in Education (KCSIE), we may record and share safeguarding information even where concerns are not yet substantiated, where this is necessary to protect pupils' welfare or meet legal duties.

4.8 International transfers

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place to protect it in accordance with UK GDPR requirements.

These safeguards may include:

- UK adequacy regulations, where the destination country has been formally assessed as providing an adequate level of protection;
- The International Data Transfer Agreement (IDTA) or
- The UK Addendum to the EU Standard Contractual Clauses, where adequacy does not apply;
- Transfer Risk Assessments (TRA) to evaluate any additional risks associated with the transfer; and
- Technical and organisational measures, such as encryption, access controls, data minimisation, and secure transfer protocols.

We apply these safeguards to ensure that personal data continues to benefit from a level of protection essentially equivalent to that provided in the UK.

4.9 How long we keep data

In line with governance and safeguarding requirements. Detailed retention criteria and retention periods are available in our full Retention Schedule.

4.10 Your rights and complaints

You have rights of access, rectification, erasure, restriction, portability and objection (subject to legal limitations, particularly for safeguarding and regulatory duties).

Some rights apply only in certain circumstances. Where we cannot comply with a request (for example due to safeguarding obligations, legal obligations, or statutory exemptions), we will explain the reasons.

If you make an access request, we will carry out reasonable and proportionate searches. If we need clarification, we may stop the clock until you provide the requested information.

If you are unhappy with how we use your data, please contact the DPL. We operate an internal data protection complaints procedure and will respond within the required timeframe. You also have the right to complain to the ICO.

4.11 Automated decision-making

We do not make decisions about you based solely on automated processing. We may use appropriate filtering/monitoring of IT systems to meet safeguarding and security duties.

4.12 Whether providing data is required

Some information is mandatory (required by law, contract, or to deliver education/safeguarding). Where information is optional, we will make this clear at the point of collection and explain any consequences of not providing it.

5. JOB APPLICANT PRIVACY NOTICE

5.1 Data Controller & Contacts

Controller: Newcastle School for Boys
Designated Data Protection Lead (DPL): Chief Operating Officer -
bursar@newcastleschool.co.uk
ICO Registration Number: Z9521438

You may raise concerns with the Information Commissioner's Office (ICO):
www.ico.org.uk or 0303 123 1113

5.2 What this notice is for

This notice explains how the School collects, uses and shares personal data about job applicants, and their rights under the UK GDPR and the Data Protection Act 2018.

5.3 Categories of personal data we process

Application forms, CVs and references; identity and right-to-work documents; qualifications; DBS information (post-offer); equalities information (optional).

5.4 Why we use this data

Assess suitability; carry out safe recruitment; meet legal and safeguarding obligations.

5.5 Our lawful bases

Public task (education/safeguarding); Legal obligation; Contract (pre-contractual steps); Consent for optional equalities monitoring.
You may withdraw consent at any time; this will not affect prior lawful processing.

Where we rely on Recognised Legitimate Interests (RLI) under Article 6(1)(ea), these purposes are pre-approved in UK law and do not require a balancing test e.g. safeguarding vulnerable individuals and responding to emergencies. We still ensure that processing is necessary for the stated purpose.

5.6 Where your data comes from

Directly from you; referees; DBS; public professional registers. We may receive personal data from third parties, for example previous schools, local authorities, the police, the Disclosure and Barring Service, health or safeguarding professionals, or publicly available sources (as applicable).

5.7 Who we share data with

Referees; DBS; recruitment platforms; professional advisers where necessary.

5.8 International transfers

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place to protect it in accordance with UK GDPR requirements. These safeguards may include:

- UK adequacy regulations, where the destination country has been formally assessed as providing an adequate level of protection;
- The International Data Transfer Agreement (IDTA) or
- The UK Addendum to the EU Standard Contractual Clauses, where adequacy does not apply;
- Transfer Risk Assessments (TRA) to evaluate any additional risks associated with the transfer; and
- Technical and organisational measures, such as encryption, access controls, data minimisation, and secure transfer protocols.

We apply these safeguards to ensure that personal data continues to benefit from a level of protection essentially equivalent to that provided in the UK.

5.9 How long we keep data

Unsuccessful applications retained for 6-12 months; successful applications form part of the staff file.

5.10 Your rights and complaints

You have rights of access, rectification, erasure, restriction, portability and objection (subject to legal limitations, particularly for safeguarding and regulatory duties).

Some rights apply only in certain circumstances. Where we cannot comply with a request (for example due to safeguarding obligations, legal obligations, or statutory exemptions), we will explain the reasons.

If you make an access request, we will carry out reasonable and proportionate searches. If we need clarification, we may stop the clock until you provide the requested information.

If you are unhappy with how we use your data, please contact the DPL. We operate an internal data protection complaints procedure and will respond within the required timeframe. You also have the right to complain to the ICO.

5.11 Automated decision-making

We do not make decisions about you based solely on automated processing. We may use appropriate filtering/monitoring of IT systems to meet safeguarding and security duties.

5.12 Whether providing data is required

Some information is mandatory (required by law, contract, or to deliver education/safeguarding). Where information is optional, we will make this clear at the point of collection and explain any consequences of not providing it.

Failure to provide it may prevent us from progressing your application.

6. VISITOR PRIVACY NOTICE

6.1 Data Controller & Contacts

Controller: Newcastle School for Boys
Designated Data Protection Lead (DPL): Chief Operating Officer -
bursar@newcastleschool.co.uk
ICO Registration Number: Z9521438

You may raise concerns with the Information Commissioner's Office (ICO):
www.ico.org.uk or 0303 123 1113

6.2 What this notice is for

This notice explains how the School collects, uses and shares personal data about visitors, and their rights under the UK GDPR and the Data Protection Act 2018.

6.3 Categories of personal data we process

Name and contact details; organisation; vehicle registration; if assistance is required during evacuations, time in/out; CCTV images.

6.4 Why we use this data

Site safety and security; safeguarding pupils and staff; compliance with KCSIE and health & safety law; provision of appropriate access arrangements.

6.5 Our lawful bases

Public task (safeguarding/ site security); Legal obligation; Legitimate interests (safeguarding/ site security).

Where we rely on Recognised Legitimate Interests (RLI) under Article 6(1)(ea), these purposes are pre-approved in UK law and do not require a balancing test e.g. safeguarding vulnerable individuals and responding to emergencies. We still ensure that processing is necessary for the stated purpose.

6.6 Where your data comes from

Directly from you; current employers (safeguarding and site security);
We may also receive personal data from third parties, for example professional bodies (where relevant), or publicly available sources (as applicable).

6.7 Who we share data with

Security providers; police (if required).

6.8 International transfers

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place to protect it in accordance with UK GDPR requirements. These safeguards may include:

- UK adequacy regulations, where the destination country has been formally assessed as providing an adequate level of protection;
- The International Data Transfer Agreement (IDTA) or

- The UK Addendum to the EU Standard Contractual Clauses, where adequacy does not apply;
- Transfer Risk Assessments (TRA) to evaluate any additional risks associated with the transfer; and
- Technical and organisational measures, such as encryption, access controls, data minimisation, and secure transfer protocols.

We apply these safeguards to ensure that personal data continues to benefit from a level of protection essentially equivalent to that provided in the UK.

6.9 How long we keep data

Visitor logs per security policy; CCTV typically retained 30 days unless required for an incident.

6.10 Your rights and complaints

You have rights of access, rectification, erasure, restriction, portability and objection (subject to legal limitations, particularly for safeguarding and regulatory duties).

Some rights apply only in certain circumstances. Where we cannot comply with a request (for example due to safeguarding obligations, legal obligations, or statutory exemptions), we will explain the reasons.

If you make an access request, we will carry out reasonable and proportionate searches. If we need clarification, we may stop the clock until you provide the requested information.

If you are unhappy with how we use your data, please contact the DPL. We operate an internal data protection complaints procedure and will respond within the required timeframe. You also have the right to complain to the ICO.

6.11 Automated decision-making

We do not make decisions about you based solely on automated processing. We may use appropriate filtering/monitoring of IT systems to meet safeguarding and security duties.

6.12 Whether providing data is required

Some visitor information is required in order to comply with safeguarding, site security and health and safety obligations. Failure to provide the required information may result in us being unable to grant access to the school site.

7. PROSPECTIVE PUPILS AND THEIR PARENTS / CARERS PRIVACY NOTICE

7.1 Data Controller & Contacts

Controller: Newcastle School for Boys.

Designated Data Protection Lead (DPL): Chief Operating Officer -
bursar@newcastleschool.co.uk

ICO Registration Number: Z9521438

You may raise concerns with the Information Commissioner's Office (ICO):
www.ico.org.uk or 0303 123 1113

7.2 What this notice is for

This notice explains how the School collects, uses and shares personal data about prospective pupils and their parents / carers, and their rights under the UK GDPR and the Data Protection Act 2018.

7.3 Categories of personal data we process

- Contact and identity details; identifiers; date of birth
- Admissions and assessment information; prior school reports
- Academic records, test/ exam results and reports
- Attendance, behaviour and exclusions
- Pastoral and safeguarding records (including low-level concerns where appropriate)
- SEND and medical information
- Financial details where relevant (fees, payments, job title)
- Images (including CCTV, still and moving images) per our Images policy
- ICT usage data, logs and filtering

7.4 Why we use this data

- Complete the assessment and admissions process.
- Administer billing, payments and services
- Support safeguarding and pastoral care
- Enable participation in events and activities
- Ensure visitor and site security

7.5 Our lawful bases

- Public task / public interest (education, safeguarding)
- Legal obligation (e.g., safeguarding, attendance, DfE returns)
- Contract (parent contract)
- Legitimate interests (school management and security)
- Consent (specific, optional uses such as certain images). You may withdraw consent at any time; this will not affect prior lawful processing.

Where we rely on Recognised Legitimate Interests (RLI) under Article 6(1)(ea), these purposes are pre-approved in UK law and do not require a balancing test e.g.

safeguarding vulnerable individuals, and responding to emergencies. We still ensure that processing is necessary for the stated purpose.

7.6 Special category /criminal data

Processed under substantial public interest (safeguarding), provision of education and welfare, vital interests, or explicit consent where required.

7.7 Where your data comes from

Directly from you or your parents/carers; previous schools; local authorities; health and safeguarding professionals.

7.8 Who we share data with

Local authorities safeguarding partners; DfE; police and safeguarding partners; IT service providers; financial providers (e.g., banks, card processors).

In line with Keeping Children Safe in Education (KCSIE), we may record and share safeguarding information even where concerns are not yet substantiated, where this is necessary to protect pupils' welfare or meet legal duties.

7.9 International transfers

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place to protect it in accordance with UK GDPR requirements.

These safeguards may include:

- UK adequacy regulations, where the destination country has been formally assessed as providing an adequate level of protection;
- The International Data Transfer Agreement (IDTA) or
- The UK Addendum to the EU Standard Contractual Clauses, where adequacy does not apply;
- Transfer Risk Assessments (TRA) to evaluate any additional risks associated with the transfer; and
- Technical and organisational measures, such as encryption, access controls, data minimisation, and secure transfer protocols.

We apply these safeguards to ensure that personal data continues to benefit from a level of protection essentially equivalent to that provided in the UK.

7.10 How long we keep data

We retain personal data in accordance with statutory requirements, safeguarding obligations, legal limitation periods and the IRMS Retention Schedule. Detailed retention criteria and retention periods are available in our full Retention Schedule.

7.11 Your rights and complaints

You have rights of access, rectification, erasure, restriction, portability and objection (subject to legal limitations, particularly for safeguarding and regulatory duties).

Some rights apply only in certain circumstances. Where we cannot comply with a request (for example due to safeguarding obligations, legal obligations, or statutory exemptions), we will explain the reasons.

If you make an access request, we will carry out reasonable and proportionate searches. If we need clarification, we may stop the clock until you provide the requested information.

If you are unhappy with how we use your data, please contact the DPL. We operate an internal data protection complaints procedure and will respond within the required timeframe. You also have the right to complain to the ICO.

7.12 Automated decision-making

We do not make decisions about you based solely on automated processing. We may use age-appropriate filtering/monitoring to meet safeguarding and network security duties.

7.13 Whether providing data is required

Some information is required by law or necessary to deliver education and safeguarding. Where information is optional, we will make this clear at the point of collection.