

# All Age Disability Privacy Notice

version 1.0

## Changes to this notice

We keep this privacy notice under regular review and we will place any updates on this web page. This Notice was last updated on 27 September 2024.

This privacy notice applies the All Age Disability Service provided by Worcestershire County Council and should be read in addition to Worcestershire County Council's [Full Privacy Notice](#).

The privacy notice will cover:

- [Purpose for processing](#)
- [Personal information collected and lawful basis](#)
- [Who we may share your information with](#)
- [How long we will hold your information](#)
- [Your information rights](#)

## Purpose for processing

The All Age Disability service process personal data in order to provide an integrated and multidisciplinary service for children and young people with Special Educational Needs and/or Disability (SEND). This is delivered either directly or jointly with partners and commissioned private and third sector providers. This includes:

- Autism and Complex Communications Needs
- Educational Psychologist Service
- Early Years Inclusion Team
- Hearing Impairment
- Learning Support Service
- Multi-Sensory Impairment
- SEND Services
- SEND School provision and education health care plans
- Social Care 0 to 16 for those with disabilities
- Social Care 16 to 25 for those with disabilities
- Specialist Short Breaks and Children's Residential Home
- Visual Impairment

## Personal data collected and lawful basis

The service processes personal data which is relevant to individual cases which may include, but is not limited to, the following personal data:

- attainment data
- attendance patterns
- communication and language preferences
- contact information – e.g. telephone numbers / email address
- details of Police involvement
- education setting details
- employment details
- financial details
- gender
- health reports / diagnostic and clinical assessment information
- lifestyle and social circumstances
- maladministration investigations
- National Insurance number or NASS number
- opinions and decisions
- personal details – e.g. name / age / address / and family details
- personal reference numbers
- reasons for support
- records of complaints
- records of moderation and monitoring visit outcomes
- safeguarding reports
- visual images, personal appearance and behaviour

We may also process some special category (sensitive) information, which is relevant to individual cases but may include some but is not limited to:

- biometric information
- offences (including alleged offences), criminal proceedings, outcomes and sentences
- physical or mental health details
- racial or ethnic origin
- religious or other beliefs
- special educational needs and disabilities

The legal bases for processing this personal data are:

- **Consent** (UK GDPR Article 6 (1) (a)) – the individual has given clear consent to process their personal data for a specific purpose
- **Legal obligation** (UK GDPR Article 6 (1) (c)) - processing is necessary to comply with the law outlined in:
  - The Children and Families Act 2014
  - The Special Educational Needs and Disabilities Regulations 2014
  - The Special Educational Needs (Personal Budgets) Regulations 2014
  - The Special Educational Needs and Disability (Detained Persons) Regulations 2015

- SEND Code of Practice 2015
- **Vital Interests** (UK GDPR Article 6 (1) (d)) - processing is necessary to protect someone's life.
- **Public task** (UK GDPR Article 6 (1) (e)) - processing is necessary to perform a task in the public interest

The special category condition for processing is:

- **Employment, social security and social protection** (UK GDPR Article 9 (2) (b)) – processing is necessary for 'Employment, social security and social protection' (condition 1 of Schedule 1 of the DPA 2018)
- **Legal claims or judicial acts** (UK GDPR Article 9 (2) (f))
- **Reasons of substantial public interest** (UK GDPR Article 9 (2) (g)) – processing is necessary for reasons of equality of opportunity or treatment (condition 8 of Schedule 1 of the DPA 2018) and support for individuals with a particular disability or medical condition (condition 16 of Schedule 1 of the DPA 2018)
- **Health or social care** (UK GDPR Article 9 (2) (h)) – processing is necessary for providing you with health and social care support (condition 2 of Schedule 1 of the DPA 2018)
- **Archiving, research and statistics** (UK GDPR Article 9 (2) (j)) – processing is necessary for research (condition 4 of Schedule 1 of the DPA 2018)

## Who we may share your information with

We may need to share the personal information you have given to us or we've collected about you with partner organisations where relevant to the individual and/or their care provision. These include but are not limited to:

- Academy Trusts
- Department for Education (DfE)
- Liquidlogic Ltd.
- Ofsted
- Other Local Authorities
- Other Local Authority Schools
- Other Worcestershire County Council teams
- NHS Services
- Police
- Worcestershire Schools
- Youth Justice Services

Information will only ever be shared when it is strictly necessary to help us provide effective services and you may have the right to refuse. We will not pass it onto any other parties unless required to do so by law or in all reasonable circumstances the disclosure is fair and warranted for the purposes of processing or subject to a data protection exemption.

We have specific data sharing agreements in place with local agencies and sometimes the law requires that we may have to pass your details on to a third party, for example, to prevent crime.

## How long we will hold your information

The standard record retention for an All Age Disability Service client record are:

- 25 years after date of birth where provision is made up to the age of 18
- 31 years after date of birth where provision is made up to the age of 25

More information about our retention periods can be found in our [summary Disposal Schedule](#).

Please note stated retention periods may be subject to any legal holds imposed under the Inquiries Act 2005 that may concern the information and override standard retention periods.

## Your information rights

You are entitled to a copy, or a description, of the personal data we hold that relates to you, subject to lawful restrictions. Please go to our [Make a Data Protection Request webpage](#) to find out how to make a request.

You may be entitled to rectification, restriction, objection, and erasure of your personal information depending on the service and legal basis. Please in the first instance contact [dataprotection@worcestershire.gov.uk](mailto:dataprotection@worcestershire.gov.uk) to exercise these Information Rights or call the main Worcestershire County Council contact telephone number of **01905 765765**.

Please see our overarching Privacy Notice (<http://www.worcestershire.gov.uk/privacy>) for further contact details and if you have a complaint about your information rights.