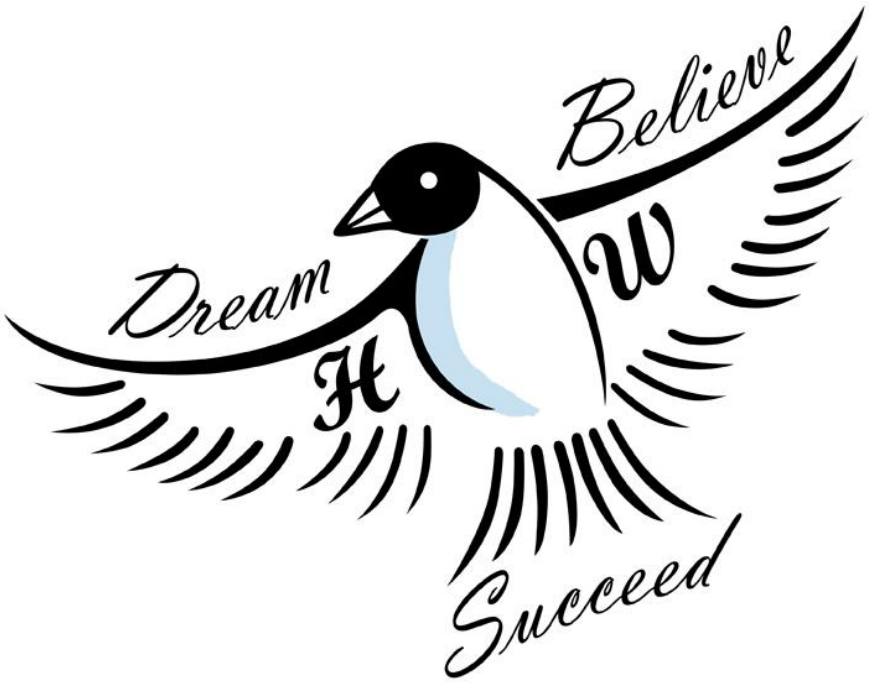


HASELWORTH PRIMARY SCHOOL
DATA PROTECTION POLICY

Policy approved:	**28th September 2026**	**FGB**
Signed:	*N Jones*	**Headteacher**
Signed:	*Dr C Roast*	**Chair of Governors**
Date of next review:	**Autumn 2028**	**Two yearly**
Monitored and evaluated by:	**Data Protection Officer**	**Termly**

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The school collects and uses personal information (referred to in the UK General Data Protection Regulation (UK GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller, of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer, Suzanne Rix, School Business Manager, who may be contacted at 023 92583657.

The school issues Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data.

1. **Purpose**

This policy sets out how the school deals with personal information correctly and securely and in accordance with the UK GDPR, and other related legislation.
This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

2. **What is Personal Information/ data?**

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic,

mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

3. Data Protection Principles

The UK GDPR establishes six principles as well as a number of additional duties that must be complied with at all times:

Transfers outside the UK will only occur where there is:

- an adequacy regulation,
- the International Data Transfer Agreement (IDTA),
- the UK Addendum to the EU SCCs,
- or another lawful safeguard.

4. Lawfulness, fairness and transparency.

Personal data shall be processed lawfully, fairly and in a transparent manner. In order for personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the UK GDPR. These include (amongst other relevant conditions) where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the school.

Where the special categories of personal data are processed, this shall include (amongst other relevant conditions) where processing is necessary for reasons of substantial public interest.

When processing personal data and special category data in the course of school business, the school will ensure that these requirements are met where relevant.

5. Purpose limitation.

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes). The school will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.

6. **Data minimisation**.

Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.

7. **Accuracy.**

Personal data shall be accurate and where necessary, kept up to date; Personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the school of any changes in circumstances to enable records to be updated accordingly. The school will be responsible for ensuring that updating or records takes place where appropriate.

8. **Storage limitation.**

Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The school will not keep personal data for longer than is necessary for the purpose or purposes for which they were collected and will take reasonable steps to destroy or erase from its systems all data which is no longer required.

9. **Integrity and confidentiality**.

Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

10. **Duties**

Personal data shall not be transferred to a country or territory outside the UK and the European Union (EU)/European Economic Area (EEA), unless that country or territory ensures an adequate level of data protection.

Data Controllers have a General Duty of accountability for personal data.

11. Commitment

The school is committed to maintaining the principles and duties in the UK GDPR at all times. Therefore, the school will:

- Inform individuals of the identity and contact details of the data controller.
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this.
- Inform individuals when their information is shared, and why and with whom unless the UK GDPR provides a reason not to do this.
- If the school plans to transfer personal data outside the UK and the EU/EEA the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information.
- Inform individuals of their data subject rights.
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept
- Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected the school shall inform the individual and where necessary seek consent.
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss,

theft and unauthorised disclosure, irrespective of the format in which it is recorded.

- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests).
- Ensure that personal information is not transferred outside the UK and the EU/EEA without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

12. Retention and Disposal of Personal Data

Ensure that when information is destroyed that it is done so appropriately and securely.

The school will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely disposed of records on the school's behalf. If we do, do, we will require the third part to provide sufficient guarantees that it complies with date protection law.

The school maintains a Retention Schedule that is specific and relevant to the specific types of information retained. The schedule outlines the appropriate periods for retention in each case. The school adapts and refers to this document for guidance.

13. Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to the handling of personal information may be referred to the

Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk

14. Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every two years. The policy review will be undertaken by the Data Protection Officer, Head teacher, or nominated representative.

15. Contacts

If you have any enquires in relation to this policy, please contact Suzanne Rix, Data Protection Officer/School Business Manager: 023 92583657, who will also act as the contact point for any queries.