Woodcroft Primary School
Data Protection Policy

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Co-ordinator responsible for the policy in consultation with the staff and governors:
Data Protection Officer and Headteacher

Reviewed: January 2026
Next Review Date: January 2029

Introduction

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, carers and other indivuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functons. In addition, the school may be required by law to collect, use and share certain information.

Woodcroft Primary School is the Data Controller, of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer, Mrs Zoe King, who may be contacted via the school office or webiste contact page.

The school issues Privacy Notices (also known as Fair Processing Notices) to all pupils, parents, carers 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 indivdiual's rights in respect of their personal 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.

Purpose

This policy sets out how the school data 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.

Woodcroft Primary School collects, processes and uses personal information relating to pupils, staff, parents and carers, Governors and visitors and therefore is a data controller, delegating the responsibility of the data controller to the Data Protection Officer (Mrs Kelly Stewart).

Roles and Responsibilities

The Governing Body has an overall responsibility for ensuring that the school complies with its obligations. The day to day responsibilities are held with the Headteacher and Data Protection Officer. The Headteacher will ensure that all staff are aware of their data protection obligations and oversee any queries related to the storing or processing of personal data.

Staff are responsible for ensuring that they collect and store any personal data in accordance with this policy. Staff must also inform the school of any changes to their personal data, such as change of address.

Data Protection Principles

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

1. **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 if 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 and special category data in the course of school businesses, the school will ensure that these requirements are net where relevant.
2. **Perpose limitiation.** 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.
3. **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 note be collected.
4. **Acuracy.** 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 resonsible for ensuring that updating or records takes place where appropriate.
5. **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.
6. **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.

Personal data shall not be transferred to a country or territory outside the UK and 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.

School's Commitment

Woodcroft Primary 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 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 they 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 EU/EEA without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Retention and Disposal of Personal Data

Woodcroft Primary School will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as approptiate.

Woodcroft Primary 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.

Complaints
Complaints will be dealt with in accordance with Woodcroft Primary School's Complaints Policy. Complaints relating to the handling of persnal information may be referred to the Information Commissioner who can be contacted at Whcliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or at www.ico.gov.uk

Privacy Notices
(full copies of privacy notices are available on the school website)

Pupils, Parents and Carers
We hold personal data about pupils to support teaching and learning, to provide pastoral care and to assess how the school is performing. We may also receive data about pupils from other organisations including, but not limited to, other schools. Local Authorities and the Department of Education, such as (but not restricted to) contact details, results of internal assessment and externally set tests, data on pupil characteristics, exclusion information and details of any medical information.

Staff
We process data relating to those we employ to work at, or otherwise engage to work at Woodcroft Primary School. The purpose of processing this data is to assist in the running of the school, including to:

- Enable individuals to be paid
- Facilitate safe recruitment
- Support the effective performance management of staff
- Improve the management of workforce data across the sector
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Support the work of the School Teachers' Review Body

Staff personal data includes, but is not limited to, information such as:

- Contact details
- National Insurance number
- Salary information
- Qualifications
- Absence data
- Personal characteristics, including ethnic groups
- Medical information

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected. We will not share information about pupils or staff with anyone without consent unless the law and our policies allow us to do so.

Individuals who wish to receive a copy of the information that we hold about them or their child should refer to the relevant sections in this policy. Any member of staff wishing to see a copy of the information about them that the school holds should contact the Headteacher or the Data Protection Officer.

We are required by law, to pass certain information about pupils to specified external bodies, such as our Local Authority and the Department for Education, so that they are able to meet their statutory obligations.

Subject Access Requests

Under the Data Protection Act 1998, pupils have a right to request access to information the school holds on them. This is known as a subject access request. There is a blank Subject Access Request form at the end of this policy (Appendix B)

Subject access requests must be submitted in writing, either by letter or email. Requests should include:

- The pupil's name
- A correspondence address
- A contact number and email address
- Details about the information requested

Woodcroft Primary School will not reveal the following information in response to subject access requests:

- Information that might cause serious harm to the physical or mental health of the pupil or another individual
- Information that would reveal that the child is at risk of abuse, where disclosure of that information would not be in the child's best interests
- Information contained in adoption and parental order records
- Certain information given to a court in proceedings concerning the child

Subject access requests for all or part of the pupil's educational record will be provided within 15 school days. There may be a charge for copying.
If a subject access request does not relate to the educational record the school will respond within 40 calendar days.

Parents and carers have the right of access to their child's educational record, free of charge, within 15 school days of a request. Personal data about a child belongs to that child and not the child's parents or carers. This is the case even where a child is too young to understand the implications of subject access rights.

For a parent to make a subject access request, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

The Information Commissioner's Office, the organisation that upholds information rights, generally regards children aged 12 and above as mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil.

Records

The Data Protection Officer has completeted a Data Mapping document that enables Woodcroft Primary School to understand what data it holds, on what basis and with whom it is shared.

Paper based records and portable electronic devices, such as school laptops, iPads and hard drives that contain personal information are kept secure when not in use. All children and staff records are kept in locked filing cabinets at all times. Class registers are kept in the office when not in use. Staff signing in book is also kept in the office at all times.

Papers containing confidential personal information will not be left on office or classroom desks, on staffroom tables or pinned to noticeboards where there is general access.

Where personal information needs to be taken off site (in either paper or electronic form) this will be carried out in accordance with the school's data mapping document.

Passwords for all school computers, laptops and other electronic devices are at least 8 characters long, ocntaining letters and numbers. Staff and pupils have a duty and are reminded to change their passwords at regular intervals.

Encryption software is used to protect all portable devices and removable media, such as external hard drives and USB devices.

Every member of staff and Governing Body have a school domain email address which is used to communicate with all staff and Governors. No personal details are included in any email that is sent. Other Hampshire County Council staff use a secure emailing software when requesting or sending personal information regarding staff or pupils.
Governors can however, choose to use thier private email address for governing body business. Governors need to consider how secure their personal e-mail is and consider if any other family members have access to this e-mail. Governors should also be aware that if the School receives a Subject Access Request (SAR) then this will include any relevant e-mails sent in their capacity regardless of which e-mail address they were sent from. If a Governor gives permission for the use of their personal email address then it is the responsibility of said Governor, not the email sender to take responsibility for it.

Governors that hold documentation at home should think about how they can keep it secure and only retain information for as long as necessary. All governors' documentation that is held by the Clerk is kept on school site in a locked cupboard. Consideration should be given to keeping the information contained on memory sticks, personal computers, tablets and phones secure e.g. encryption or password protection: do not access the information from these devices in a public place or leave them in a car overnight.

Woodcroft Primary School use SAP for electronically holding staff records and personal information and SIMS for holding pupil educational and personal information, parents, carers and other contact personal information. Target Tracker is used by teaching staff to track and access pupil attainment. Tucasi is also used for communicating to parents via text and for parents to pay for trips etc online.

Staff have access to remote working from home, which enables staff to log on to the school server, SIMS and SAP as well as Target Tracker. This remote access conforms to the UK GDPR regulations.

Staff and Governors who store personal information on their personal devices must follow the same security procedures for school-owned equipment.

Personal information that is no longer required, has become inaccurate or out of date, is disposed of securely following the Hampshire Retention Schedule document for guidance. Woodcroft Primary School use both shedding and confidential waste collection as a means to dispose securely. We subscribe to an SLA with an ICT Company who have the authority to legally dispose of electronic equipment that is no longer required.

Other Information

Training
Our staff and Governors are provided with data protection training as part of their induction process. Data protection also forms part of the schools' continuing professional development, where changes to legislation or the school's processes make it necessary.

The General Data Protection Regulation
Woodcroft Primary School acknowledge that the law is changing on the rights of data subjects and that the General Data Protection Regulation is due to come into force in May 2018.

Monitoring Arrangements
The Headtecher, Data Protection Officer and Governor representative are responsible for monitoring and reviewing this policy. This policy is linked to the Freedom of Information Publication that can be found on the school's website.

Appendix A

Definitions

Term	Definition
Personal Data	Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified
Sensitive Personal Data	Data such as: • Racial or ethnic origin • Political opinions • Religious beliefs, or beliefs of a similar nature • Where a person is a membe of a trade union • Physical health • Mental health • Sexual orientation • Whether a person has committed, or is alleged to have committed, an offence • Criminal convictions
Processing	Obtaining, recording or holding data
Date Subect	The person whose personal data is held or processed
Data Controller	A person or organisation that determines the purposes for which and the manner in which, personal data is processed.

Woodcroft Primary School
Subject Access Request Form (SAR)

Name of submitting person:

Name of individual who's information is being requested:

Name of authorised authority:

Please provide two appropriate identification types at the time of submitting this form, in person. No personal information will be recorded from your proof of identification. We will not release an individual's personal information until we are satisifed who is raising the request is either the intended recipient or a member of a geitimate authorised organisation (Police, Social Worker, Solicitor etc).

Accepted proof of idenfification include:

- Current passport
- Current driving licence
- Utility bill (less than 3 months old)

Please complete the boxes below:

Information Detail Requested	Date Requested	Date Issued

Please note:
Parents, carers or authorities requesting information relating to Children's personal data that we process and store on behalf of our clients will need to submit a Subject Access Request (SAR) form via Woodcroft Primary School direct.
We will seek advice in every case, from the Information Commissioner Office (ICO) prior to releasing requested information relating to children.
Adults submitting a SAR may be required to provide more information relating to the request. I nthese circumstances, we will respond to you within 40 calendar days of submitting this SAR form.
However, if any of the information requested is in the educational record, then Woodcroft Primary School will respond within 15 school days.

Your request may be with held due to a lowful exemption or where the information might cause serious harm to the physical or mental health of the pupil or another individual. It this is the case please see our reasons below. If you are unhappy with the result or information released from this SAP, please contact the Information Commissioners Office to whom we arecommed you seek advice on 0303 123 1113.

ID checked by: ID check date: Released/Declined: Date: