

# Data Protection Policy

Holme Slack Community Primary School



Approved by:	Keith Manogue	Date: 17/07/2025
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# Data Protection Policy

This policy applies to all Holme Slack Community Primary School employees (including voluntary, temporary, contract and seconded staff) who capture, create, store, use, share, and dispose of information on behalf of the school. These persons are referred to as 'Users' throughout the policy.

Holme Slack Community Primary School shall be referred to as 'the school' or 'we'.

This policy relates to all electronic and paper-based information.

## Statement of Commitment

To undertake our statutory obligations effectively, deliver services and meet stakeholder expectations, the school collects, uses and retains information, much of which is personal, sensitive or confidential. This may relate to:

- Pupils
- Parents and Guardians
- Governors
- Employees or their families
- Members of the public
- Business partners
- Local authorities or public bodies

We regard the lawful and correct treatment of personal data as vital to maintaining confidence and compliance. The school will ensure full compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and related guidance including:

- Department for Education (DfE) statutory requirements
- Keeping Children Safe in Education (KCSIE) 2024
- Local Authority data management expectations

## Data Protection Principles

Under the UK GDPR, personal data must be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept no longer than necessary
- Processed securely using appropriate technical or organisational measures

## *Lawful Bases for Processing*

These include:

- Consent
- Performance of a contract
- Legal obligation
- Vital interests

- Public task

For special category data (e.g., health, ethnicity), additional lawful bases apply including explicit consent and employment or social protection law.

## **Compliance Measures**

To meet data protection obligations, the school will:

- Raise awareness through training
- Maintain and review this policy annually
- Conduct regular data audits (data mapping)
- Maintain a Risk Register
- Use updated consent forms and ensure audit trails
- Appoint a qualified Data Protection Officer (DPO)
- Publish Privacy Notices in line with UK GDPR requirements
- Enable data subjects to exercise their rights:
  - Right to be informed
  - Right of access (responded to within one month)
  - Right to rectification
  - Right to erasure
  - Right to restrict processing
  - Right to data portability
  - Right to object
  - Rights relating to automated decision-making
- Ensure contracts with third-party processors include data protection clauses
- Implement organisational and technical safeguards
- Conduct Data Protection Impact Assessments (DPIAs) for new systems/projects
- Ensure data transfers outside the UK are compliant
- Report notifiable breaches to the ICO within 72 hours
- Conduct data quality checks regularly

## **Safeguarding and KCSIE Compliance**

In line with KCSIE 2024:

- Personal data processed for safeguarding must be treated as special category data
- Only designated safeguarding leads (DSLs) and authorised staff should access such data
- Sharing safeguarding information must follow the 'need to know' principle

## **DfE and Local Authority Compliance**

The school follows DfE guidance including:

- Data protection toolkit for schools
- IRMS Toolkit for retention and disposal schedules
- Age Appropriate Design Code compliance for online services used by pupils under 13

## **Retention and Disposal**

The school will maintain and follow a documented retention schedule for all personal data, aligned with the IRMS guidance.

## **Data Sharing**

Data sharing will occur only where:

- There is a legal or statutory obligation
- The data subject has provided consent
- It is necessary to protect vital interests or for safeguarding purposes

All external data sharing must be supported by a data sharing agreement.

## **Breach Management**

All suspected breaches will be logged, investigated and, if necessary, reported to the ICO. The school will keep an internal incident log and review lessons learned.

## **Rights of the Individual**

Data subjects have the right to:

- Be informed
- Access their data
- Rectify inaccuracies
- Request erasure (with exceptions)
- Restrict processing
- Data portability
- Object to processing
- Safeguards related to profiling and automated decision-making

Requests must be handled within legal timeframes and documented accordingly.

## **Contact**

### **Data Protection Officer (DPO)**

Email: [sbm@holmeslack.lancs.sch.uk](mailto:sbm@holmeslack.lancs.sch.uk)

Phone: 01772 795257

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