

DATA PROTECTION (GDPR) POLICY

OVERVIEW

St. Mary's R.C. Primary School is committed to protecting the personal data of pupils, parents, carers, staff, governors, visitors and other individuals whose personal data is processed by the school.

The school will comply with the requirements of the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, as amended by the **Data (Use and Access) Act 2025**, where applicable.

The school will ensure that personal data is collected, processed, stored, accessed, shared and disposed of fairly, lawfully, securely and transparently.

This policy should be read alongside the school's other relevant policies and procedures relating to information security, safeguarding, records management, retention and disposal, confidentiality and information sharing.

INTENT

The purpose of this policy is to ensure that:

1. The school understands and meets its responsibilities under the **UK GDPR and Data Protection Act 2018**.
2. Personal data is processed lawfully, fairly and transparently and only for specified, explicit and legitimate purposes.
3. The school only collects personal data that is **adequate, relevant and limited to what is necessary** for the purposes for which it is processed.
4. Personal data is accurate and, where necessary, kept up to date.
5. Personal data is not retained for longer than is necessary, in accordance with the school's retention arrangements.
6. Personal data is protected against unauthorised or unlawful processing and against accidental loss, destruction or damage.
7. Individuals understand their rights in relation to their personal data and are able to exercise those rights in accordance with the law.
8. Appropriate privacy information is provided to individuals explaining how and why their personal data is processed.

9. Where consent is used as the lawful basis for processing, it is obtained, recorded and managed in accordance with the requirements of the UK GDPR.
10. The school maintains appropriate records of its personal-data processing activities and reviews its data-processing arrangements regularly.
11. Data protection considerations are incorporated into the design and implementation of new systems, processes and services where appropriate.
12. Staff and governors understand their responsibilities for protecting personal data and receive appropriate guidance and training.

IMPLEMENTATION

1. **Lawful processing**

The school will identify and document an appropriate lawful basis for processing personal data before processing takes place. These may include legal obligation, public task, legitimate interests where applicable, contractual necessity, vital interests or consent, as appropriate.

2. **Special category data**

Where the school processes special category personal data, an appropriate condition under the UK GDPR and Data Protection Act 2018 will also be identified and applied.

3. **Children's data**

The school recognises that children require particular care when their personal data is processed. Information provided to children about the use of their personal data will be presented in a clear and age-appropriate manner where appropriate.

4. **Consent**

Consent will only be used where it is an appropriate lawful basis for processing. Where consent is relied upon, it will be freely given, specific, informed and unambiguous, and records of consent will be maintained. Consent will not be used where another lawful basis is more appropriate.

5. **Privacy information**

The school will provide appropriate privacy information to individuals explaining what personal data is collected, why it is collected, how it is used and other information required by data-protection legislation.

6. **Individual rights**

The school will respect the rights of individuals in relation to their personal data, including the right of access and other applicable data-subject rights. Requests will be dealt with within the statutory requirements.

7. **Data accuracy**

Reasonable steps will be taken to ensure that personal data held by the school is accurate and kept up to date where necessary.

8. **Data minimisation**

The school will only collect and process personal data that is necessary and relevant for the identified purpose.

9. **Data sharing**

Personal data will only be shared where there is a lawful basis for doing so and appropriate safeguards are in place. Information may be shared with other organisations where required or permitted by law.

10. **Data protection by design**

Data protection principles will be considered when introducing new systems, technologies, processes or services involving personal data. Where processing is likely to result in a high risk to individuals, the school will consider whether a **Data Protection Impact Assessment (DPIA)** is required.

11. **Data breaches**

The school will maintain procedures for identifying, managing and responding to personal data breaches. Where a breach is likely to result in a risk to individuals' rights and freedoms, it will be reported to the **Information Commissioner's Office (ICO)** within the required statutory timeframe.

12. **Data Protection Officer**

The school will have access to an appropriately appointed **Data Protection Officer (DPO)** where required by law. The DPO will provide advice and guidance on the school's data-protection responsibilities and monitor compliance as appropriate.

13. **Records and documentation**

The school will maintain appropriate records to demonstrate compliance with data-protection legislation and will review its data-processing arrangements periodically.

14. **Staff responsibilities**

All staff and governors who have access to personal data are responsible for handling it appropriately and maintaining confidentiality. Appropriate training and guidance will be provided.

15. **Data retention and disposal**

Personal data will be retained only for as long as necessary and will be securely disposed of when it is no longer required, in accordance with the school's retention arrangements.

IMPACT

St. Mary's R.C. Primary School will ensure that personal data is processed in accordance with the principles of the **UK GDPR**.

Personal data will 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 where necessary;**
- **Kept only for as long as necessary;** and
- **Processed securely**, with appropriate measures in place to protect it against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The school will take a proportionate and responsible approach to data protection and will regularly review its practices to ensure continued compliance with current data-protection legislation and guidance.

Review

Policy reviewed: September 2026

Next review: September 2029

Responsibility: Headteacher / Data Protection Officer

Legislation: UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025