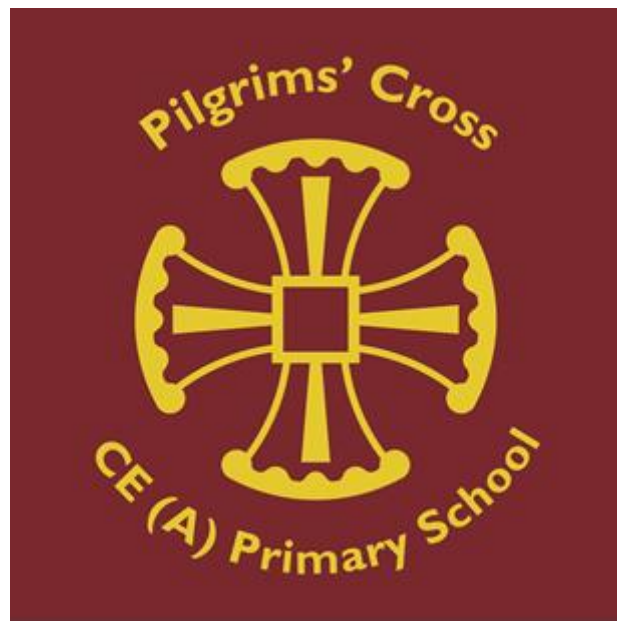


*Learning, to make a difference,
in God's world*

Pilgrims' Cross CE Aided Primary School



Data Protection Policy 2026-2027

Reviewed by	Headteacher and staff	Authorised by	FGB
Last review	May 2026	Review Cycle	Annually

1. Introduction

Pilgrims' Cross CE Aided Primary School is committed to protecting the rights and freedoms of individuals and ensuring that personal data is processed lawfully, fairly, securely and transparently. The school recognises its obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant legislation and guidance issued by the Information Commissioner's Office (ICO).

The school processes personal information relating to pupils, parents, carers, staff, governors, volunteers, contractors and visitors in order to carry out its educational, safeguarding and operational functions.

This policy outlines how the school manages personal data and ensures compliance with data protection legislation.

2. Scope

This policy applies to:

- All staff
- Governors
- Volunteers
- Contractors
- Agency workers
- Any individual processing personal data on behalf of the school

The policy applies to personal data held electronically, on paper or in any other format.

3. Definitions

Personal Data

Any information relating to an identified or identifiable living individual.

Special Category Data

Information requiring additional protection, including:

- Health information
- Ethnicity
- Religious beliefs
- Biometric data
- Genetic data

Processing

Any operation carried out on personal data, including collection, recording, storage, use, sharing, amendment or deletion.

Data Subject

The individual whose personal data is being processed.

4. Data Protection Principles

The school will comply with the seven principles of UK GDPR.

Personal data must be:

1. Lawful, Fair and Transparent

Processed lawfully, fairly and in a transparent manner.

2. Purpose Limitation

Collected for specified, explicit and legitimate purposes.

3. Data Minimisation

Adequate, relevant and limited to what is necessary.

4. Accuracy

Accurate and kept up to date where necessary.

5. Storage Limitation

Retained only for as long as necessary.

6. Integrity and Confidentiality

Protected against unauthorised access, loss, damage or disclosure.

7. Accountability

The school will be able to demonstrate compliance with all data protection obligations.

5. Governance and Responsibilities

Governing Body

The Governing Body has overall responsibility for ensuring appropriate arrangements are in place for compliance with data protection legislation.

The Governing Body will receive assurance regarding:

- Data protection compliance
- Data breaches
- Subject Access Requests
- Cyber security risks
- Staff training
- Data protection audits

Headteacher

The Headteacher is responsible for the operational implementation of this policy and ensuring staff comply with data protection requirements.

Data Protection Officer (DPO)

The school has appointed a Data Protection Officer who provides independent advice, guidance and monitoring of compliance.

The DPO is responsible for:

- Advising on compliance requirements
- Monitoring data protection arrangements
- Supporting data breach investigations
- Advising on Data Protection Impact Assessments (DPIAs)
- Acting as the contact point for the ICO

DPO contact details are published on the school website and within the school's privacy notices.

Staff

All staff are responsible for:

- Protecting personal information
- Following school procedures
- Reporting data breaches immediately
- Completing mandatory data protection training

6. Lawful Processing

The school will only process personal data where there is a lawful basis to do so.

The lawful bases most commonly relied upon include:

- Public Task
- Legal Obligation
- Contract
- Vital Interests
- Consent (where appropriate)

Special category data will only be processed where an additional lawful condition applies.

7. Privacy Notices

The school will provide clear Privacy Notices explaining:

- What information is collected
- Why it is collected
- How it is used
- Who it is shared with
- How long it is retained
- Individual rights

Privacy Notices will be made available to staff, parents, pupils and governors.

8. Individual Rights

Individuals have the right to:

- Be informed
- Access their personal data
- Request rectification
- Request erasure where applicable
- Restrict processing
- Object to processing
- Data portability where applicable
- Not be subject to solely automated decision making

Requests will be handled in accordance with UK GDPR timescales and requirements.

9. Subject Access Requests

The school will respond to Subject Access Requests (SARs) without undue delay and within one calendar month unless an extension is permitted under legislation.

All requests should be referred immediately to the Headteacher and Data Protection Officer.

10. Information Security

The school will implement appropriate technical and organisational measures to protect personal information.

These measures include:

- Secure passwords
- Access controls
- Secure storage systems
- Encryption where appropriate
- Anti-virus protection
- Secure disposal procedures
- Cyber security controls
- Secure backups

Personal information must only be accessed by authorised individuals who require it for legitimate school purposes.

11. Personal Data Breaches

A personal data breach is any incident leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

All actual or suspected breaches must be reported immediately to the Headteacher and DPO.

The school will:

- Investigate all breaches
- Maintain a breach register
- Assess risks to individuals
- Notify the ICO where required
- Inform affected individuals where legally required

Reportable breaches will be notified to the ICO within 72 hours where applicable.

12. Data Sharing

The school will only share personal information where:

- There is a lawful basis to do so
- The sharing is necessary and proportionate
- Appropriate safeguards are in place

Information may be shared with:

- Local Authorities
- Department for Education
- Safeguarding agencies
- Health services
- Educational partners
- Regulatory bodies

The school will maintain records of significant data sharing arrangements.

13. International Transfers

Personal data will not be transferred outside the UK unless appropriate safeguards exist in accordance with UK GDPR requirements.

14. Artificial Intelligence (AI)

The school recognises the increasing use of Artificial Intelligence technologies.

Staff must not input confidential, personal or safeguarding information into AI systems unless:

- Authorised by the school;
- A lawful basis exists;
- Appropriate security safeguards are in place.

Any use of AI involving personal data must comply with this policy and relevant legislation.

15. Records Management and Retention

The school maintains a Records Retention Schedule.

Personal data will:

- Be retained only for as long as necessary;
- Be reviewed regularly;
- Be securely destroyed when no longer required.

Secure disposal methods include:

- Confidential shredding;
- Secure electronic deletion;
- Approved confidential waste services.

16. Training and Awareness

All staff and governors will receive:

- Data protection induction training;
- Regular refresher training;
- Updates on legislative changes;
- Cyber security awareness training.

Training records will be maintained.

17. Monitoring and Assurance

The school will regularly monitor compliance through:

- Internal audits;
- Data protection reviews;
- Cyber security assessments;
- Monitoring of breaches and incidents;
- Governor oversight.
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Findings will be reported to the Governing Body where appropriate.

18. Complaints

Individuals who are dissatisfied with how their personal data has been handled should raise concerns through the school's complaints procedure.

Individuals also have the right to complain directly to:

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Website: www.ico.org.uk

19. Policy Review

This policy will be reviewed annually by the Governing Body or sooner if:

- Legislation changes;
- ICO guidance changes;
- Significant incidents occur;
- School practices change.

The Governing Body will ensure that the policy remains effective, proportionate and compliant with legal requirements.