



Data Protection Policy

Little Ealing Primary School

Author of policy	Caroline Hodges
Policy owned by	Resources Committee
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RENEWAL DATE	October 2025

LITTLE EALING PRIMARY SCHOOL DATA PROTECTION POLICY

CONTACT

If you would like to discuss anything in this policy, in the first instance please contact the School lead below:

Position	Name	Email	Phone
School Lead	Caroline Hodges	caroline.hodges@leps.org.uk	0208 567 2135
Data Protection Officer	Darrell Smith	darrell.smith@turniton.co.uk	01844 390940

AIMS

Little Ealing Primary School aims to ensure that all data collected about staff, students, parents and visitors is collected, stored, and processed in accordance with the General Data Protection Regulation (GDPR). This policy applies to all data, regardless of whether it is in paper or electronic format.

LEGISLATION & GUIDANCE

This policy meets the requirements of the General Data Protection Regulation (GDPR), and is based on guidance published by the Information Commissioner's Office and model privacy notices published by the Department for Education.

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: • Contact details • Racial or ethnic origin • Political opinions • Religious beliefs, or beliefs of a similar nature • Where a person is a member of a trade union • Physical and mental health • Sexual orientation • Whether a person has committed, or is alleged to have committed an offence • Criminal convictions
Processing	Obtaining, recording, storing, altering or destruction data
Data subject	This living individual whose personal data is held or processed
Data controller	A person or organisation that determines the purpose for which and the way personal data is processed
Data processor	A person, other than an employee of the data controller, who processes the data on behalf of the data controller

THE DATA CONTROLLER

Little Ealing Primary School processes personal information relating to students, staff, parents, students' emergency contacts and visitors, and therefore, is a data controller. We are registered as a data controller with the Information Commissioner's Office and renew this registration annually.

DATA PROTECTION PRINCIPLES

The GDPR is based on the following data protection principles or rules for good data handling:

- Data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate, and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

ROLES & RESPONSIBILITIES

The Governing Body is responsible for ensuring that Little Ealing Primary School complies with its obligations under the GDPR.

Day-to-day responsibilities rest with the Headteacher. 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 a change of address.

Data breach reporting is mandatory under the GDPR and all staff are aware of their obligation to report data breaches without delay.

PRIVACY / FAIR PROCESSING NOTICE

Pupils & Parents

We hold personal data about pupils to support teaching and learning, to provide pastoral care and to assess how the school is performing. We also receive data about pupils from other organisations including, but not limited to, other schools, Local Authorities, the Department for Education and the National Health Service.

This data includes, but is not restricted to:

- Contact details
- Results of internal assessment and externally set tests
- Data on student characteristics, such as ethnic group or Special Educational Needs and Disabilities
- Exclusion information
- Details of any medical conditions

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 do not hold any biometric data for pupils.

We will not share information about pupils 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 / their child should refer to Subject Access Requests or Parental Requests to see the Education Record sections of this policy.

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 can meet their statutory obligations.

Staff

We process data relating to those we employ to work at, or otherwise engage to work at Little Ealing 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 safer recruitment practice
- Support the effective performance management of staff
- Improve the management of workforce data across the education sector
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable monitoring of people with, and without, Protected Characteristics under the Equality Act
- Support the work of the School Teachers' Review Body

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

- Contact details, next of kin
- National Insurance numbers
- Salary information
- Qualifications
- Absence data
- Personal characteristics / protected characteristics
- Medical information
- Outcomes of any disciplinary procedures

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 do not hold any biometric data for staff.

We will not share information about staff with third parties without consent unless the law allows us to. This may include advisers such as our Occupational Health and our Human Resources advisers. We are required, by law, to pass certain information about staff to specified external bodies, such as our Local Authority and the Department for Education, so that they can meet their statutory obligations.

Any staff member wishing to see a copy of information about them that the school holds should contact the Headteacher.

SUBJECT ACCESS REQUESTS

Under the GDPR, staff, students and parents/carers have a right to request access to information the school holds about them. This is known as a Subject Access Request.

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

- The subjects name
- A correspondence address
- A contact number and email address
- Details about the information requested

We 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 subject 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 student's educational record will be provided within 15 school days.

We reserve the right to charge for requests which are deemed to be excessive.

PARENTAL REQUESTS TO SEE THE EDUCATIONAL RECORD

Parents of pupils at Little Ealing Primary School do not have an automatic right to access their child's educational record. We will decide on a case-by-case basis whether to grant such requests, and we will bear in mind guidance issued from time to time from the Information Commissioner's Office (the organisation that upholds information 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 of pupils at our school may be granted without the express permission of the pupil.

If parents ask for copies of information, they will be required to pay the cost of making the copies.

DATA ACCURACY

Data held will be as accurate and up to date as reasonably possible. If a data subject informs the school of a change of circumstances his / her computer records will be updated as soon as is practicable.

Data Collection Sheets for pupils will be provided to data subjects so they can check its accuracy and make any amendments annually, during the Autumn term.

For staff data collection sheets will be issued every 12 months.

Where a data subject challenges the accuracy of his / her data the school will immediately mark the record as potentially inaccurate or "challenged". In the case of any dispute, we shall try to resolve the issue informally, but if this proves impossible, disputes will be referred to the Governing Body under the formal Complaints Procedure.

Storage of Records

- Paper-based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept under lock and key when not in use.
- Papers containing confidential personal information should not be left in office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access.
- Where personal information needs to be taken off site (in paper or electronic form), staff must sign in and out from the school office. Staff must adhere to school policies and procedures when taking data off site.
- Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, online resources, laptops and other electronic devices.
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices. Encryption, anonymization and pseudonymisation will be used to protect the data.
- Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures for school-owned equipment.
- Governors are required to use school email addresses and use cloud storage for sharing information and data.
- GDPR compliant cloud storage will be used for all online data storage.

DISPOSAL OF RECORDS

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely according to our Data Destruction Policy.

We will cross-shred paper-based records and override electronic files.

TRAINING

Our staff and governors are provided with data protection training as part of their induction process and this is refreshed annually.

Data protection will also form part of the continuing professional development, where changes to legislation or school processes make it necessary to keep staff up-to-date.

MONITORING ARRANGEMENTS

The Headteacher is responsible for monitoring and reviewing this policy.

Our Data Protection Officer checks that we comply with this policy by, among other things, reviewing school records at least annually or more frequently if required.

This document will be reviewed annually. At every review, the policy will be shared with the Governing Body.

LINKS WITH OTHER POLICIES

This Data Protection Policy is linked to:

- The Remote Working Policy
- The Freedom of Information Publication Scheme
- Privacy Notice (pupil & parents)
- Privacy Notice (staff)
- Records Management Policy
- Use of Email Policy
- Data Destruction Policy
- Record Retention Policy
- Subject Access Request Policy

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