

Red Hall Primary School

Privacy Procedure



Policy Version Control	
Policy type:	Primary School
Policy prepared by (name and designation):	Mandy Denton Office Manager
Last review date:	May 2023 -MD
	May 2024 - MD
	September 2026 - AJ
Description of changes:	Updated policy – Legislative Framework – UK GDPR, Data Protection Act 2018, Freedom of Information Act 2000
Date of Governing Body approval:	September 2026
Next review date:	September 2027

1. Purpose

Red Hall Primary School is committed to protecting the privacy and security of personal information. This policy explains how the school collects, uses, stores, shares and protects personal data relating to pupils, parents, carers, staff, governors, volunteers and visitors.

The school processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

2. Scope

This policy applies to all personal data processed by the school, whether held electronically or in paper format.

It applies to:

- Pupils
- Parents and carers
- Employees
- Governors
- Volunteers
- Contractors
- Visitors
- Applicants for employment

3. Roles and Responsibilities

Governing Body

The Governing Body has overall responsibility for ensuring that the school complies with data protection legislation.

Headteacher

The Headteacher is responsible for ensuring that appropriate systems and procedures are implemented to protect personal information.

Data Protection Officer (DPO)

The school's Data Protection Officer provides advice and guidance, monitors compliance and acts as the point of contact for the Information Commissioner's Office (ICO).

Staff

All staff are responsible for:

- Following data protection procedures.
- Maintaining confidentiality.
- Reporting data breaches promptly.
- Completing required data protection training.

4. Principles of Data Protection

The school will ensure that personal data is:

- Processed lawfully, fairly and transparently.
- Collected for specified and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
- Kept secure through appropriate technical and organisational measures.
- Processed in a way that demonstrates accountability.

5. Lawful Basis for Processing

The school processes personal data under one or more of the following lawful bases:

- Consent.
- Performance of a contract.
- Compliance with a legal obligation.
- Protection of vital interests.
- Performance of a task carried out in the public interest.
- Legitimate interests where these are not overridden by an individual's rights.

Where special category data is processed, an additional condition under Article 9 UK GDPR will also apply.

6. Privacy Information

The school will provide privacy information explaining:

- What information is collected.
- Why it is collected.
- The lawful basis for processing.
- Who information may be shared with.
- How long data is retained.
- The rights of individuals.
- How to raise concerns or complaints.

Privacy notices will be published on the school website and provided when personal information is collected.

7. Sharing Information

The school may share information with:

- Department for Education (DfE)
- Local Authorities
- NHS and health professionals

- Safeguarding agencies
- Examination and assessment bodies
- Educational support services
- Professional advisers and auditors

Information will only be shared where there is a lawful basis to do so.

8. Data Security

The school will implement appropriate security measures including:

- Secure password controls.
- Access controls based on role.
- Encryption where appropriate.
- Secure disposal of records.
- Staff training.
- Regular monitoring and review of systems.

Any data breach will be investigated and managed in accordance with the school's Data Breach Procedure.

9. Retention of Records

Personal information will be retained in accordance with the school's Records Retention Schedule and statutory requirements.

Records will be securely deleted, destroyed or anonymised when no longer required.

10. Individual Rights

Individuals have the right to:

- Be informed about how their data is used.
- Access their personal information.
- Request correction of inaccurate information.
- Request erasure where applicable.
- Restrict processing in certain circumstances.
- Object to processing.
- Data portability where applicable.
- Not be subject to solely automated decision-making.

Requests should be submitted to the school office or Data Protection Officer.

11. Complaints

If an individual is unhappy with how their personal information has been handled, they should first contact the school.

Individuals also have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: www.ico.org.uk

12. Monitoring and Review

This policy will be reviewed annually, or sooner if legislation, statutory guidance or operational requirements change.