# Data Protection Policy

| **Document History** | |
|---|---|
| Created or reviewed: | Summer 2026 |
| Reviewing officer: | Operations Director |
| Review frequency: | Annually |
| Review date: | Summer 2027 |

| **Version Control** | | | |
|---|---|---|---|
| Version | Date | Notes and amendments | Approval |
| 0.1 | 21/06/2023 | Initial draft | RMD |
| 0.2 | 22/06/2023 | Edits following feedback from Headteacher | RMD |
| 5.0 | 23/06/2023 | Published Copy | RMD |
| 6.0 | 10/04/2026 | Published Copy | RMD |
| 6.1 | 10/06/2026 | Published Copy | RMD |

# Contents

## Introduction and Scope

The Gleddings School Limited is required to process personal information about staff, pupils, parents, guardians, and other individuals we may interact with. We must do this in compliance with data protection and other relevant legislation.

This policy provides a framework for ensuring that we comply with the requirements of the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 (DPA), as well as associated guidance and Codes of Practice issued under the legislation.

This policy including its appendices applies to our entire workforce. This includes employees, governors, contractors, agents and representatives, volunteers and temporary staff working for, or on our behalf of. Individuals who are found to knowingly or recklessly infringe this policy may face disciplinary action.

This is our main information governance policy and applies to all personal data, whether paper or electronic. It should be read alongside the other policies within our information governance policy framework.

## Roles and Responsibilities

Overall responsibility for ensuring that the school meets the statutory requirements of any data protection legislation lies with the Board of Governors. The following roles have day to day responsibility for compliance and provide the necessary assurance to the Board.

**Data Protection Officer (DPO)**
The role of the DPO is to assist the school in monitoring compliance with data protection legislation and advise on data protection issues. We have appointed Veritau as our DPO. Veritau's contact details are:

Schools Data Protection Officer
Veritau
West Offices
Station Rise
York
North Yorkshire
YO1 6GA

schoolsdpo@veritau.co.uk // 01904 554025

The DPO is an advisory role, and its duties include:

- Informing and advising us and our employees about our obligations to comply with UK GDPR, the Data Protection Act 2018, and other data protection and information access laws;
- Monitoring compliance with data protection legislation and other information governance policies;
- Raising awareness of data protection issues; and
- Liaising with the Information Commissioners Office (ICO).

**Senior Information Risk Owner (SIRO)**
The SIRO is a senior member of staff who is ultimately responsible for operational risk. The SIRO will ensure that our information governance policies and procedures

are effective and comply with legislation, promote best practice, and embed a culture of data protection compliance. In our organisation this role lies with the Headteacher.

**Single Point of Contact (SPOC)**
The SPOC is someone at school level who can take operational responsibility for data protection, including communicating with data subjects and the DPO. In our organisation this role lies with the School Manager.

**Information Asset Owner (IAO)**
An IAO is an individual responsible for the security and maintenance of a particular information asset and for ensuring that other staff members use the information safely and responsibly. IAO's are appointed based on sufficient seniority and level of responsibility, and will be documented in our Information Asset Register (IAR).

**All staff**
All staff, including governors, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school are responsible for collecting, storing and processing any personal data in accordance with this policy.

## Data Protection Principles

We will comply with the data protection principles, as defined in Article 5 of the UK GDPR. We will ensure that personal information is:

- Processed lawfully, fairly and in a transparent manner **(Lawfulness, Fairness and Transparency**).
- Collected only for specified, explicit and legitimate purposes (**Purpose Limitation**).
- Adequate, relevant and limited to what is necessary for the purposes for which it is processed (**Data Minimisation**).
- Accurate and where necessary kept up to date (**Accuracy**).
- Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed (**Storage Limitation**).
- Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (**Security, Integrity and Confidentiality**).

We recognise that not only must we comply with the above principles and be able to must also demonstrate our compliance **(Accountability).**

## Lawful Bases

UK GDPR sets out several conditions for lawfully processing personal information. We will usually rely on the lawful basis of public task or legal obligation; however, we may sometimes rely on our legitimate interests. We will only do this where we use data in ways individuals would reasonably expect and where we have a justifiable reason.

When relying on legitimate interests, we will ensure that we provide individuals with clear and transparent information about how personal data will be used, including details of how to opt-out.

We may rely on vital interests as the lawful basis for sharing information in a situation where we believe someone is at risk of serious harm, for example, in a mental health emergency.

We will have an Appropriate Policy Document (APD) in place (see Appendix One) which provides information about our processing of special category (SC) and criminal offence (CO) data and demonstrates how we comply with the requirements of the UK GDPR and DPA.

## Data Subject Rights

Under the UK GDPR, individuals have several rights in relation to the processing of their personal data:

**Right to be informed**
When we collect their data, we will provide individuals with privacy information, normally through a privacy notice made easily accessible to the data subject. Privacy notices will be clear and transparent, regularly reviewed, and include all information required by data protection legislation.

**Right of access**
Individuals have the right to access and receive a copy of the information we hold about them. This is commonly known as a subject access request (SAR). We have in place a SAR procedure which details how we deal with these requests (Appendix Two).

Other rights include the right to rectification, right to erasure, right to restrict processing, right to object, right to data portability and rights related to automated decision-making, including profiling.

Requests exercising these rights can be made to any member of staff. Still, we encourage requests to be made in writing, wherever possible, and forwarded to our SPOC who will acknowledge the request and respond within one calendar month. Advice regarding such requests will be sought from our DPO where necessary.

A record of decisions made in respect of the request will be retained, recording details of the request, whether any information has been changed, and the reasoning for the decision.

## Records of Processing

Under Article 30 of the UK GDPR, we must keep a record of our processing activities. We will do this by developing and maintaining an Information Asset Register (IAR) which will include as a minimum:

- The school's name and contact details,
- The name of the information asset,
- The owner of that asset, known as the Information Asset Owner (IAO),
- The purposes of the processing,
- A description of the categories of individuals and the types of personal data,
- Who has access to the personal data, and who it is shared with,
- The lawful bases for each processing activity,
- The format and location of the personal data,
- Details of any transfers to countries outside of the UK, and the appropriate safeguards,
- The retention periods for each asset,
- A general description of the technical and organisational security measures to protect the information.

We will review the IAR at least annually to ensure it remains accurate and up to date, consulting with the DPO as necessary.

## Privacy by Design and Risk Assessments

We will adopt a privacy by design approach and implement appropriate technical and organisational security measures to demonstrate how we integrate data protection into our processing activities.

We will conduct a data protection impact assessment (DPIA) when undertaking new, high-risk processing, or making significant changes to existing data processing. The DPIA will consider and document the risks associated with a project prior to its implementation, ensuring data protection is embedded by design and default.

The data protection principles will be assessed to identify specific risks. These risks will be evaluated and solutions to mitigate or eliminate these risks will be considered. Where a less privacy-intrusive alternative is available, or the project can go ahead without the use of special category data, we will opt to do this.

## Information Sharing

Sometimes, we must share information with third parties to efficiently fulfil our duty of education provision. Our privacy notices and IAR will document routine and regular information-sharing arrangements.

Any further or ad-hoc sharing of information will only be done so in compliance with legislative requirements, including the ICO's data sharing code of practice. We will only share personal information where we have a lawful basis to do so, ensuring any disclosure is necessary and proportionate. All disclosures will be approved by the relevant staff member and recorded in a disclosure log.

## Contract Management

All third-party contractors who process data on our behalf must be able to provide assurances that they have adequate data protection controls in place. Where personal data is being processed, we will ensure that there is a written contract in place which includes all the mandatory data processing clauses in accordance with Article 28 of the UK GDPR.

We will maintain a record of our data processors, and regularly review the data processing contracts, with support from the DPO, to ensure continued compliance.

Where possible, personal information processed by us is not transferred outside of the European Economic Area (EEA), which the UK government deems to have adequate data protection standards. If personal data is transferred outside the EEA, we will consult with the DPO and take reasonable steps to ensure appropriate safeguards are in place. These safeguards will be recorded in our data processor register.

## Training

We will ensure that appropriate guidance and training on data protection and access to information are given to our workforce, governors, and other authorised users. Training will be delivered as part of the induction process and at least every two years. Refresher training will be carried out as required.

Specialised roles or functions with key data protection responsibilities, such as the SIRO, SPOC and IAOs, will also receive additional training specific to their role.

We will maintain a record of all completed training and ensure that data protection awareness is raised in staff briefings and as standard agenda items in meetings, where appropriate.

## Data Protection Complaints

Data protection complaints relating to a completed SAR will be processed as an internal review request in accordance with Appendix 2.

Any other complaints or concerns about our compliance with data protection legislation or our handling of personal data will be dealt with as a data protection complaint.

Our general data protection complaints procedure is as follows:

- Complaints may be received directly by email, telephone, or in person. Alternatively, individuals may contact our Data Protection Officer.
- We encourage individuals to provide sufficient evidence or supporting information where possible, to allow us to investigate the complaint.
- If necessary, we may request proof of ID (or proof of authority where the complainant is acting on behalf of another person).
- We will acknowledge complaints within 30 days of receipt. This includes weekends and bank holidays.
- We will take steps to respond to complaints without undue delay. This includes making appropriate enquiries and keeping the complainant informed.
- We will inform people of the outcome of their complaints. This includes explaining any steps we have taken to address the complaint.

If an individual remains dissatisfied after we have concluded our internal data protection complaints process, they may complain to the Information Commissioner's Office. Its contact details are below:

The telephone helpline (0303 123 1113) is open Monday to Friday between 9am and 5pm (excluding bank holidays). Alternative methods to report, enquire, register and raise complaints are available on the ICO's website Contact us | ICO.

## Appendix One - Appropriate Policy Document (APD)

### Introduction

The Gleddings School Limited processes special category and criminal conviction data while fulfilling its functions. Schedule 1 of the Data Protection Act 2018 requires data controllers to have an 'appropriate policy document' where certain processing conditions apply for special categories of personal and criminal conviction data. This document will fulfil this requirement.

This will complement our existing records of processing as required by Article 30 of UK General Data Protection Regulation. It will also reinforce our existing retention and security policies, procedures and other documentation regarding special category data.

### Special categories and conditions of processing

We will process the following special categories (SC) of data:

- racial or ethnic origin,
- religious or philosophical beliefs,
- trade union membership,
- health or medical information.

We also process criminal offence (CO) data under Article 10 of UK GDPR, including for pre-employment checks and employee declarations, in accordance with their contractual obligations.

We rely on the following processing conditions under Article 9 of UK GDPR and Schedule 1 of the Data Protection Act 2018 to process special category and criminal convictions data lawfully:

**Article 9(2)(a) – explicit consent**
We will ensure that consent obtained from individuals is clear and specific for one or more outlined purposes. It must be granted through affirmative action and recorded as a requirement for processing. We will also conduct regular reviews of consents to ensure they remain current and valid.

Examples of such processing include asking visitors for health or medical information to aid them in an emergency.

**Article 9(2)(b) – employment, social security or social protection**
We must collect special category data to comply with our legal requirements as an employer and safeguard our pupils.

Examples include carrying out DBS checks on staff to evidence suitability for a role, collecting medical information to make reasonable adjustments at work and monitor staff absence, and keeping records of an employee's trade union membership.

When processing information under Article 9(2)(b), we also require a Schedule 1 condition under the Data Protection Act 2018. The condition we rely on for this processing is **Schedule 1, Part 1, (1) - employment, social security and social protection.**

**Artilce 9(2)(c) – vital interest**

We must share SC data where an individual is physically or legally unable to consent and there is a serious risk to life.

An example is when there is an urgent or emergency situation, and an individual is at risk of harm to themselves or to others, such as in a mental health crisis.

A Schedule 1 condition is not required for processing under Article 9 (2)(c).

**Article 9(2)(g) – reasons of substantial public interest**
Much of our processing of SC data will be done so for the purposes of substantial public interest.

Examples include processing SC data to identify pupils who require additional support, such as special educational needs, processing safeguarding concerns to ensure the safety and wellbeing of pupils, or collecting medical information when monitoring pupil attendance and allergen or dietary requirements.

When processing data under Article 9(2)(g), we also require a Schedule 1 condition under the Data Protection Act 2018. The conditions we rely on for this processing are **Schedule 1, Part 2, (6) – statutory and government purposes; (10) – preventing or detecting unlawful acts; and (18) – safeguarding of children and of individuals at risk.**

## Compliance with Data Protection Principles

We will have several policies and procedures in place to ensure our compliance with the Article 5 Data Protection Principles and meet our accountability obligations:

**Accountability principle**
We will implement appropriate technical and organisational security measures to meet the accountability requirements. These will include:

- The appointment of a Data Protection Officer.
- Taking a data protection by design and default approach to our processing activities, including completing risk assessments.
- Maintaining documentation of our processing activities through an Information Asset Register.
- Adopting and implementing an information governance framework.
- Ensuring we have compliant contracts in place with data processors.
- Implementing appropriate security measures regarding the personal data we process. Our Information Security Policy provides more detail.

**Principle (a): lawfulness, fairness and transparency**
Processing personal data must be lawful, fair and transparent. We will identify an appropriate Article 6 condition and also, where processing SC or CO data, an Article 9 and Schedule 1 condition.

We will consider how processing may affect individuals concerned and provide clear and transparent information about why we process personal data, including our lawful bases, in our privacy notices and this document. All privacy notices will provide details of data subject rights. Our privacy information will be regularly reviewed and updated to reflect our processing accurately.

**Principle (b): purpose limitation**

Organisations can only act in ways and for purposes which they are empowered to do so by law. Personal data is, therefore, only processed to allow us to carry out the necessary functions and services we are required to provide in line with legislation.

We clearly set out our purposes for processing in our privacy notices, policies and procedures, and in our IAR. If we plan to use personal data for a new purpose, other than a legal obligation or function set out in law, we will check that it is compatible with our original purpose, or we will advise individuals of the new purpose.

**Principle (c): data minimisation**
We will only collect the minimum personal data needed for the relevant purposes, ensuring it is necessary and proportionate. Any personal information no longer required, especially with special category data, will be anonymised or erased. Further information can be found in our Records Management Policy.

**Principle (d): accuracy**
When we become aware that personal data is inaccurate or out of dated, we will take reasonable steps to ensure that data is erased or rectified without delay. Where we cannot erase or rectify the data, for example because the lawful basis we rely on to process the data means these rights do not apply, we will document our decision. Where we have shared information with a third party, we will take all reasonable steps to inform them of the inaccuracies and rectification. We will maintain a log of all data rights requests and have appropriate processes for handling such requests.

**Principle (e): storage limitation**
Our Retention Schedule will set out how long we will retain records. Where there is no legislative or best practice guidance, the SIRO will decide how long the information should be retained based on its necessity for legitimate purposes. We will also maintain a Destruction Log, documenting what information was destroyed, the date it was destroyed and why. Further information can be found in our Records Management Policy.

**Principle (f): integrity and confidentiality (security)**
We will employ various technical and organisational security measures to protect the personal and special category data that we process. A full description of security measures can be found in our Information Security Policy.

In the event of a personal data breach the incident will be recorded on a log, investigated, and reported to our Data Protection Officer where necessary. This process is documented in greater detail in our Information Security Policy.

## Appendix Two – Subject Access Request (SAR)

Under the UK GDPR, individuals have the right to make a subject access request (SAR) to any member of our workforce, governor, or contractor or agent working on our behalf. Requests need not be made in writing, but we encourage applicants to do so where possible. Requests should be forwarded to the SPOC who will log and acknowledge them within five working days.

We must be satisfied with the requestor's identity and may have to ask for additional information to verify this, such as:

- valid photo ID, such as driver's licence or passport,
- proof of address, such as a utility bill or council tax letter, or
- confirmation of email address.

Only once we are confident of the requestor's identity and have sufficient information to understand the request will it be considered valid. We will then respond to the request within the statutory timescale of one calendar month.

If the request is considered 'complex', we can apply a discretionary extension of up to two more calendar months. If we wish to apply an extension, we will inform the applicant within the first calendar month of receiving the request.

Requests are considered 'complex' only if we can demonstrate that they meet one or more of the following factors:

- Information is technically difficult to retrieve, or specialist support is required.
- Large volumes of sensitive information where exemptions may need to be applied.
- Clarifying potential issues concerning confidentiality and/or disclosure of sensitive information.
- Needing to obtain specialist legal advice.
- Searching large volumes of unstructured manual records.

Requests involving large volumes of information may add complexity, but volume alone is not considered 'complex.'

If we consider applying exemptions to the requested information before disclosure, we will seek guidance from out DPO. We may also refuse a manifestly unreasonable or excessive request in limited circumstances.

**Internal review**

Data protection complaints related to completed SARs will be processed as internal review requests.

When acknowledging receipt, we will inform you that we are processing your complaint as an internal review request.

An internal review will be handled by an appropriate staff member who was not involved in the original request. They will examine the original request and response and decide whether it was handled appropriately and whether it followed the legislation. The reviewing officer will decide whether to uphold or overturn any exemptions. Where possible, a full response will be provided within one calendar month.

If an individual remains dissatisfied after our investigation, they may appeal to the Information Commissioner's Office. Its contact details are below:

The telephone helpline (0303 123 1113) is open Monday to Friday between 9 a.m. and 5 p.m. (excluding bank holidays). Alternative methods for reporting, enquiring, registering, and raising complaints are available on the ICO's website here.

## Appendix Three - Surveillance Policy

### Introduction

This policy concerns our use of surveillance technology and related processing of personal data. It is written in accordance with data protection and human rights legislation, statutory guidance and relevant codes of practice.

### Definition of surveillance

Surveillance is the close observation or monitoring of people's activities either by physical means, such as surveillance camera system, or by the collection and analysis of personal data, such as monitoring emails, phone calls, and internet browsing.

We will not operate covert surveillance technologies; therefore this policy does not cover the use of such technology.

### Surveillance camera systems

A surveillance camera system, formally called CCTV, includes the cameras and all the related hardware and software transmitting, processing and sotring the captured data. We will operate surveillance camera systems to:

- Protect our buildings and property.
- Protect the safety and wellbeing of pupils, our workforce and visitors.
- Deter and discourage anti-social behaviour such as bullying, theft and vandalism.
- Monitor compliance with our rules, codes of conduct and policies.
- Support the police in the prevention and detection of crime

### E-monitoring

'E-monitoring' or 'digital monitoring' is when an organisation uses software to monitor a user's activity on an electronic device or network. We will deploy e-monitoring software across our network, covering fixed and portable devices (PCs, laptops and tablets).

We operate e-safety monitoring software to:

- Safeguard our pupils and staff.
- Promote wellbeing and early intervention in high-risk incidents.
- Ensure appropriate use of school assets and resources.
- Monitor compliance with our rules and policies.

### Data protection by design and default

Under the UK GDPR, we are required to consider and address privacy implications to data subjects when implementing new data processing systems. This is known as privacy by design. The usual method for assessing privacy risks to individuals is by carrying out a Data Protection Impact Assessment (DPIA).

A DPIA is mandatory for surveillance activities since they are deemed particularly privacy intrusive. We will ensure that DPIAs are completed for any surveillance system and that there are no unmitigated high risks to the rights and freedoms of data subjects. In addition, we will review and update the relevant DPIA if we substantively change our systems.

We are open and transparent about using surveillance technology and identify whether we are a controller or joint controller of the information. Where we use external providers to process the date on our behalf, we will have a written contract meeting the requirements of Article 28 of the UK GDPR. We will only use providers who can ensure they have appropriate measures to safeguard the data.

## Transparency

The use of surveillance camera systems must be visibly signed. Signage will include the purpose of the system, the name of the organisation operating the system and details of who to contact about the system. The signage will be clear and kept unobstructed, so that anyone entering the area knows that they are being recorded.

Users will be made aware of the e-monitoring in relevant policies, newsletters, internal communications, and visual cues such as notifications on computer log-in screens and/or on the browser page when they join the network.

Our privacy notices will include more detailed information about out use of surveillance technologies, including information about date subject rights.

## Access Controls

Surveillance system data will only be accessed to comply with the specified purpose. For example, footage of camera systems intended to prevent and detect crime will only be examined where there is evidence to suggest criminal activity has occurred. Logs of e-monitoring systems intended to safeguard children will only be examined where there is reasonable cause to believe a child is at risk.

Each system will have proportionate access controls and a nominated Information Asset Owner (IAO) who will be responsible for its governance and security. The IAO may authorise other specified staff members to access data on the system routinely or on an ad-hoc basis.

## Ad-hoc requests and disclosures

An individual's request for surveillance data held about them will be treated as a subject access request (SAR). See Appendix Two.

Requests for surveillance data from an official agency, such as the police or insurance providers, will be processed as ad hoc disclosure requests. We will confirm the purpose of the request and the lawful basis for processing the data. We may also require formal documentation in support of the request. If we have any concerns about such requests, we will liaise with our Data Protection Officer (DPO).

## Records of processing and retention

Under Article 30 of the UK GDPR, we have a duty to ensure that all our data processing activities are recorded for accountability purposes. To fulfil this requirement, we maintain an Information Asset Register and ensure that the use of surveillance systems is detailed on it. Any external providers processing surveillance data on our behalf are included in our data processor register.

Surveillance records will only be held as long as necessary to fulfil the specific purpose and will be deleted in line with our retention schedule.

## Reviews

Surveillance systems must be reviewed annually to ensure they remain necessary, proportionate and effective. We will update the DPIAs to reflect changes in system use or data collection type. The relevant IAO is responsible for ensuring reviews are completed, and evidence of this is maintained.

We will use the checklist included in Appendix A of this document to review our surveillance camera systems.

## Appendix A – Surveillance Camera System Checklist

**School Name: The Gleddings School Limited**

| **Name and Description of Surveillance System:** | | |
|---|---|---|
| The system addresses the purpose and requirements (i.e. the cameras record the required information). | **YES** | |
| | **Notes:** cameras are sited and images recorded for security purposes within school premises. | |
| The system is still fit for purpose and produces clear images of adequate resolution. | **YES** | |
| | **Notes:** | |
| Cameras are sited in effective positions to fulfil their task. | **YES** | |
| | **Notes:** | |
| Cameras are positioned so that they avoid capturing the images of persons not visiting the premises and/or neighbouring properties. | **YES** | |
| | **Notes:** No CCTV in classrooms. | |
| Visible signs showing that cameras are in operation. These signs include:<br>▪ Who operates the system,<br>▪ Their contact details,<br>▪ What the purpose of the system. | **YES** | |
| | **Notes:** | |
| Camera recordings are securely stored and access limited. | **YES** | |
| | **Notes:** access only to authorised members of staff. | |
| The system has the capability to fulfil a | **YES** | |

| | | |
|---|---|---|
| request for an individual's own personal information or an ad-hoc disclosure. | **Notes:** We will only share CCTV footage with other agencies where there is a lawful reason to do so | |
| The system has a set retention period and records outside of retention are deleted. | **YES** | |
| | **Notes:** The school will retain this data for 35 days as per the CCTV policy | |
| Authorised users can selectively delete information inside the retention period to fulfil the right to erasure. | | **NO** |
| | **Notes:** The retention period is the minimum period that images are held for. | |
| All operators have been authorised by the Information Asset Owner and have completed mandatory data protection training. | **YES** | |
| | **Notes:** All staff have been trained | |
| The system has been added to the IAR and data processing register. | **YES** | |
| | **Notes:** One system only. | |

| **Checklist completed by:** | **Checklist reviewed and signed by (Information Asset Owner):** |
|---|---|
| Name: Rosalind Denton<br>Job Title: UK Finance Director<br>Date: Spring 2026 | Name: Gini Garside<br>Job Title: School Manager<br>Date: Spring 2026 |