



CRADLEY CE PRIMARY SCHOOL

Cradley Primary School

Data Protection Policy

Vision Statement: Enriching Lives

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<u>Dates</u>			
Written			
Reviewed	Autumn 25		
Amended			
Next Review	Autumn 26		



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1. Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents, and visitors is collected, stored, and processed in accordance with the Data Protection Act 2018, UK GDPR, and relevant statutory safeguarding guidance. This policy applies to all data, whether in paper or electronic format.

2. Legislation and Guidance

This policy complies with:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Keeping Children Safe in Education 2025 (Statutory Safeguarding Guidance)
- ICO guidance for organisations
- DfE Data Protection guidance for schools
- Education (Pupil Information) (England) Regulations 2005

3. Definitions

Personal Data: Information relating to an identified or identifiable person.

Sensitive Personal Data: Includes special category data such as racial or ethnic origin, health data, religious beliefs, etc.

Data Controller: The school, which determines the purposes and means of processing personal data.

Data Processor: A person or organisation processing data on behalf of the controller.

4. The Data Controller

The school is the data controller and delegates responsibility to the Headteacher and Chair of Governors. The school is registered annually with the ICO.

5. Data Protection Principles

We comply with the principles of UK GDPR and the Data Protection Act 2018:

- Process data lawfully, fairly, and transparently.
- Collect data for specified, explicit, and legitimate purposes.
- Ensure data minimisation and accuracy.
- Retain data only as long as necessary.
- Secure data against unauthorised or unlawful processing.
- Ensure data subjects' rights are respected.



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- Do not transfer data outside the UK unless adequate safeguards are in place.

6. Roles and Responsibilities

Governing Board: Strategic responsibility for compliance and safeguarding arrangements.

Headteacher: Day-to-day responsibility for data protection compliance and staff awareness.

Staff: Responsible for handling personal data in accordance with this policy and reporting any breaches.

7. Privacy/Fair Processing Notice

We collect and process personal data to support teaching, learning, pastoral care, safeguarding, and school management. Data includes contact details, assessment results, medical and safeguarding information, and staff employment details. Data is retained only as long as necessary and shared only when legally permitted or required.

8. Subject Access Requests (SARs)

- Pupils and parents have the right to request access to personal data held by the school.
- Requests must be made in writing and will be responded to within one calendar month (UK GDPR standard).
- Certain information may be withheld if disclosure could cause harm or breach confidentiality.
- Fees will not normally be charged unless requests are manifestly unfounded or excessive.

9. Parental Requests to See Educational Records

- Parents have a right to access their child's educational records free of charge within 15 school days.
- Personal data belongs to the child, and parental requests may require consent from the child where they are deemed mature enough (usually age 12+).

10. Storage of Records

- All personal data is stored securely, with paper records locked and electronic data encrypted and password protected.
- Personal information is not left unattended or accessible to unauthorised persons.
- Staff must sign out any personal data taken off-site and ensure secure disposal after use.

11. Disposal of Records

- Personal data no longer required is securely disposed of by shredding paper records and overwriting electronic files.
- Disposal may be outsourced to certified companies for electronic data.



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12. Training

- All staff and governors receive data protection training at induction and ongoing updates as needed.
- Training includes understanding data protection responsibilities, safeguarding, and reporting breaches.

13. Data Breach Management

- Any data breach must be reported immediately to the Headteacher or Data Protection Officer.
- The school will follow ICO guidelines on breach management, including notification to affected individuals and the ICO if required.

14. Monitoring Arrangements

- The Headteacher and Governors will review this policy annually or when legislation changes.
- Compliance checks will be conducted termly by the School Business Manager.
- Policy updates will be shared with the governing board.

15. Links with Other Policies

- Safeguarding Policy
- Staff Code of Conduct
- ICT and Acceptable Use Policy
- Records Management Policy
- Freedom of Information Publication Scheme

Sources:

- Keeping Children Safe in Education 2025 (DfE, July 2025)
- Data Protection Act 2018 & UK GDPR
- ICO Guidance for Organisations
- DfE Data Protection Guidance for Schools (latest)