

The Federation of Winklebury Infant and Junior Schools

**Willoughby Way, Basingstoke RG23 8AF
Website: <https://www.winkleburyfederation.co.uk/>
Telephone: 01256 323244**

Headteacher: Mrs K Bartlett



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Data Protection Policy

Date policy produced/reviewed: 03.07.26

Policy produced/reviewed by: Headteacher

Ratified by the governing body: 13.07.26

Signed:

Position:

Date of next review: Jul 28

Data Protection Policy

The school collects and uses personal information (referred to in the UK General Data Protection Regulation (UK GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller, of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer, who may be contacted at dpo@winklebury-jun.hants.sch.uk or dpo@winklebury-inf.hnts.sch.uk.

The school issues Privacy Notices to all pupils, parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data.

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the UK GDPR, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

What is Personal Information/ data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The UK GDPR establishes six principles as well as a number of additional duties that must be complied with at all times:

1. Lawfulness, fairness and transparency.

Personal data shall be processed lawfully, fairly and in a transparent manner. In order for personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the UK GDPR. These include (amongst other relevant conditions) where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the school.

Where the special categories of personal data are processed, this shall include (amongst other relevant conditions) where processing is necessary for reasons of substantial public interest.

When processing personal data and special category data in the course of school business, the school will ensure that these requirements are met where relevant.

2. Purpose limitation.

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes). The school will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.

3. Data minimisation

Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.

3. Accuracy

Personal data shall be accurate and, where necessary, kept up to date. Personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the school of any changes in circumstances to enable records to be updated accordingly. The school will be responsible for ensuring that updating of records takes place where appropriate.

4. Storage limitation

Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The school will not keep personal data for longer than is necessary for the purpose or purposes for which they were collected and will take reasonable steps to destroy or erase from its systems all data which is no longer required.

5. Integrity and confidentiality

Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Duties

Personal data shall not be transferred to a country or territory outside the UK unless that country or territory ensures an adequate level of data protection.

Data Controllers have a General Duty of accountability for personal data.

Commitment

The school is committed to maintaining the principles and duties in the UK GDPR at all times. Therefore the school will:

- Inform individuals of the identity and contact details of the data controller.
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this.
- Inform individuals when their information is shared, and why and with whom unless the UK GDPR provides a reason not to do this.
- If the school plans to transfer personal data outside the UK, the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information.
- Inform individuals of their data subject rights.
- Inform individuals that the individual may withdraw consent (where relevant) and that, if consent is withdrawn, the school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept.
- Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected, the school shall inform the individual and where necessary seek consent.
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that, when information is destroyed, it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests).
- Ensure that personal information is not transferred outside the UK without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Retention and Disposal of Personal Data

The school will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as appropriate.

The school maintains a Retention Schedule that is specific and relevant to the specific types of information retained. The schedule outlines the appropriate periods for retention in each case.

Data Protection Complaints

Complaints relating to the handling of personal information will be handled by the Headteacher.

Data protection complaints can be submitted by email to dpo@winklebury-jun.hants.sch.uk or dpo@winklebury-inf.hants.sch.uk. The school's Data Protection Officer, who have been trained to recognise data protection complaints, will log the data protection complaint, acknowledge the complaint within 10 working days and provide a substantive response to the complaint within 30 days, beginning from the day of receipt.

When a data protection complaint is received, the school will, without undue delay, take appropriate steps to respond and inform the complainant of the outcome. The school will also review the complaint for any learning or actions the school can take to improve. If the school identifies areas for improvement, it will keep track of how this learning or actions are implemented.

The school will aim to resolve data protection complaints, however, if individuals are not happy with the school's response, then they may raise their concern with the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at <https://ico.org.uk/make-a-complaint/>.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by the Data Protection Officer, Headteacher or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Mrs Wood in the School Office who will also act as the contact point for any queries.