



The Fernwood School

"High Achievement with Care & Discipline for All"

Data Protection Policy

This policy will be monitored regularly and evaluated so that it remains responsive to current issues. This will be co-ordinated by the Data Protection Lead.

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Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents and carers, trustees, visitors and other individuals is collected, stored and processed in accordance with UK data protection law.

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Legislation and Guidance

This policy meets the requirements of the:

-  UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#)
-  [Data Protection Act 2018 \(DPA 2018\)](#)

It is based on guidance published by the Information Commissioner's Office (ICO) on the [UK GDPR](#) and guidance from the Department for Education (DfE) on [Generative artificial intelligence in education](#).

It also reflects the ICO's [guidance](#) for the use of surveillance cameras and personal information. In addition, this policy complies with our funding agreement and articles of association.

Definitions

Term	Definition
Personal data	Any information relating to an identified, or identifiable, living individual. This may include the individual's:  Name (including initials)  Identification number  Location data  Online identifier, such as a username It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.
Special categories of personal data	Personal data which is more sensitive and so needs more protection, including information about an individual's:  Racial or ethnic origin  Political opinions  Religious or philosophical beliefs  Trade union membership  Genetics  Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes  Health – physical or mental  Sex life or sexual orientation
Processing	Anything done to personal data, such as collecting, recording, organising, structuring,

	storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
Data subject	The identified or identifiable individual whose personal data is held or processed.
Data controller	A person or organisation that determines the purposes and the means of processing of personal data.
Data processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
Personal data breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

The Data Controller

The Fernwood Academy Trust processes personal data relating to parents, pupils, staff, trustees, visitors and others, and therefore is a data controller.

The Trust is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

Roles and Responsibilities

This policy applies to all staff employed by The Fernwood Academy Trust, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

Board of Trustees

The board of trustees has overall responsibility for ensuring that our Trust complies with all relevant data protection obligations.

Head Teacher

The head teacher acts as the representative of the data controller on a day-to-day basis. The head teacher is responsible for overseeing the implementation of this policy and developing related policies and guidelines where applicable.

Data Protection Officer

The data protection officer (DPO) is responsible for monitoring our compliance with data protection law.

The DPO is also the first point of contact for individuals whose data the Trust processes, and for the ICO.

Our DPO is Invicta Law Ltd and is contactable via:

DPO@invicta.law

Alternatively, our DPO can be contacted via the correspondence address:

Data Protection Leads

The Data Protection Leads provide support to the DPO in investigating breaches and assist in the monitoring of the Trust's compliance for the data protection law. The data protection leads will also provide an annual report of their activities directly to the board of trustees and, where relevant, report to the board their advice and recommendations on school data protection issues.

All Staff

Staff are responsible for:

-  Collecting, storing and processing any personal data in accordance with this policy
-  Informing the school of any changes to their personal data, such as a change of address
-  In the first instance contacting the data protection leads in the following circumstances:
 -  With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 -  If they have any concerns that this policy is not being followed
 -  If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 -  If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the UK
 -  If there has been a data breach
 -  Whenever they are engaging in a new activity that may affect the privacy rights of individuals
 -  If they need help with any contracts or sharing personal data with third parties
 -  If staff members are unsatisfied with the response from the data protection leads or have further concerns regarding data protection compliance they should contact the DPO

Data Protection Principles

The GDPR is based on data protection principles that our Trust must comply with. The principles say that personal data must be:

-  Processed lawfully, fairly and in a transparent manner
-  Collected for specified, explicit and legitimate purposes
-  Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
-  Accurate and, where necessary, kept up to date
-  Kept for no longer than is necessary for the purposes for which it is processed
-  Processed in a way that ensures it is appropriately secure

This policy sets out how the Trust aims to comply with these principles.

Collecting Personal Data

Lawfulness, Fairness and Transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- ✎ The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked the school to take specific steps before entering into a contract
- ✎ The data needs to be processed so that the school can **comply with a legal obligation**
- ✎ The data needs to be processed to ensure the **vital interests** of the individual or another person i.e. to protect someone's life
- ✎ The data needs to be processed so that the school, as a public authority, can **perform a task in the public interest or exercise its official authority**
- ✎ The data needs to be processed for the **legitimate interests** of the school (where the processing is not for any tasks the school performs as a public authority) or a third party, provided the individual's rights and freedoms are not overridden
- ✎ The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**

For special categories of personal data, we will also meet one of the special category conditions for processing under data protection law:

- ✎ The individual (or their parent/carer when appropriate in the case of a pupil) has given **explicit consent**
- ✎ The data needs to be processed to perform or exercise obligations or rights in relation to **employment, social security or social protection law**
- ✎ The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent
- ✎ The data has already been made **manifestly public** by the individual
- ✎ The data needs to be processed for the establishment, exercise or defence of **legal claims**
- ✎ The data needs to be processed for reasons of **substantial public interest** as defined in legislation
- ✎ The data needs to be processed for **health or social care purposes**, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- ✎ The data needs to be processed for **public health reasons**, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- ✎ The data needs to be processed for **archiving purposes**, scientific or historical research purposes, or statistical purposes, and the processing is in the public interest

For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:

- ✎ The individual (or their parent/carer when appropriate in the case of a pupil) has given **consent**

- 👤 The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent
- 👤 The data has already been made **manifestly public** by the individual
- 👤 The data needs to be processed for or in connection with legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of **legal rights**
- 👤 The data needs to be processed for reasons of **substantial public interest** as defined in legislation

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

We will always consider the fairness of our data processing. We will ensure we do not handle personal data in ways that individuals would not reasonably expect, or use personal data in ways which have unjustified adverse effects on them.

Limitation, Minimisation and Accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs.

We will keep data accurate and, where necessary, up-to-date. Inaccurate data will be rectified or erased when appropriate.

In addition, when staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the school's record retention schedule.

Sharing Personal Data

We will not normally share personal data with anyone else without consent, but there are certain circumstances where we may be required to do so. These include, but are not limited to, situations where:

- 👤 There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- 👤 We need to liaise with other agencies – we will seek consent as necessary before doing this
- 👤 Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:
 - 👤 Only appoint suppliers or contractors that can provide sufficient guarantees that they comply with UK data protection law
 - 👤 Establish a contract with the supplier or contractor to ensure the fair and lawful processing of any personal data we share
 - 👤 Only share data that the supplier or contractor needs to carry out their service

We will also share personal data with law enforcement and government bodies where we are legally required to do so.

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

Where we transfer personal data internationally, we will do so in accordance with data protection law.

Safeguarding

The school understands that the UK GDPR does not prevent or limit the sharing of information for the purposes of keeping children safe.

The school will ensure that staff have due regard to their ability to share personal information for safeguarding purposes, and that fears about sharing information must not be allowed to obstruct the need to safeguard and protect pupils. The board of trustees will ensure that staff are:

-  Confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
-  Aware that information can be shared without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a pupil in a timely manner.

The school will ensure that information pertinent to identify, assess and respond to risks or concerns about the safety of a child is shared with the relevant individuals or agencies proactively and as soon as is reasonably possible. Where there is doubt over whether safeguarding information is to be shared, especially with other agencies, the Designated Safeguarding Lead (DSL) will ensure that they record the following information:

-  Whether data was shared
-  What data was shared
-  With whom data was shared
-  For what reason data was shared
-  Where a decision has been made not to seek consent from the data subject or their parent
-  The reason that consent has not been sought, where appropriate

The school will aim to gain consent to share information where appropriate; however, staff will not endeavour to gain consent if to do so would place a child at risk. The school will manage all instances of data sharing for the purposes of keeping a child safe in line with the Child Protection and Safeguarding Policy.

Pupils' personal data will not be provided where the serious harm test is met. Where there is doubt, the school will seek independent legal advice.

Subject Access Requests and Other Rights of Individuals

Subject Access Requests

Individuals have a right to make a 'subject access request' to gain access to personal information that the Trust holds about them. This includes:

-  Confirmation that their personal data is being processed
-  Access to a copy of the data
-  The purposes of the data processing
-  The categories of personal data concerned

- 🔒 Who the data has been, or will be, shared with
- 🔒 How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- 🔒 Where relevant, the existence of the right to request rectification, erasure or restriction, or to object to such processing
- 🔒 The right to lodge a complaint with the ICO or another supervisory authority
- 🔒 The source of the data, if not the individual
- 🔒 Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual
- 🔒 The safeguards provided if the data is being transferred internationally

Subject access requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing and include:

- 🔒 Name of individual
- 🔒 Correspondence address
- 🔒 Contact number and email address
- 🔒 Details of the information requested

If staff receive a subject access request they must immediately forward it to the DPO.

Children and Subject Access Requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may not be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

Responding to Subject Access Requests

When responding to requests, we:

- 🔒 May ask the individual to provide 2 forms of identification
- 🔒 May contact the individual via phone to confirm the request was made
- 🔒 Will respond without delay and within 1 month of receipt of the request (or receipt of the additional information needed to confirm identity, where relevant)
- 🔒 Will provide the information free of charge
- 🔒 May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary

We may not disclose information for a variety of reasons, such as if it:

- 🔒 Might cause serious harm to the physical or mental health of the pupil or another individual
- 🔒 Would reveal that the child is being or has been abused, or is at risk of abuse, where the disclosure of that information would not be in the child's best interests

- ✎ Would include another person's personal data that we can't reasonably anonymise, and we don't have the other person's consent and it would be unreasonable to proceed without it
- ✎ Is part of certain sensitive documents, such as those related to crime, immigration, legal proceedings or legal professional privilege, management forecasts, negotiations, confidential references, or exam scripts

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee to cover administrative costs. We will take into account whether the request is repetitive in nature when making this decision.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO or they can seek to enforce their subject access right through the courts.

Other Data Protection Rights of the Individual

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see section 7), individuals also have the right to:

- ✎ Withdraw their consent to processing at any time
- ✎ Ask us to rectify, erase or restrict processing of their personal data (in certain circumstances)
- ✎ Prevent use of their personal data for direct marketing
- ✎ Object to processing which has been justified on the basis of public interest, official authority or legitimate interests
- ✎ Challenge decisions based solely on automated decision making or profiling (i.e. making decisions or evaluating certain things about an individual based on their personal data with no human involvement)
- ✎ Be notified of a data breach (in certain circumstances)
- ✎ Make a complaint to the ICO
- ✎ Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

Biometric Recognition Systems

Where we use pupils' biometric data as part of a biometric recognition system (for example, pupils use finger prints to receive school dinners instead of paying with cash), we will comply with the requirements of the [Protection of Freedoms Act 2012](#).

Parents/carers will be notified before any biometric recognition system is put in place or before their child first takes part in it. The Trust will get written consent from at least one parent or carer before we take any biometric data from their child and first process it.

Parents/carers and pupils have the right to choose not to use the school's biometric system(s). We will provide alternative means of accessing the relevant services for those pupils. For example, pupils can pay for school dinners in cash at each transaction if they wish.

Parents/carers and pupils can withdraw consent, at any time, and we will make sure that any relevant data already captured is deleted.

As required by law, if a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, we will not process that data irrespective of any consent given by the pupil's parent(s)/carer(s).

CCTV

We use CCTV in various locations around the school site to ensure it remains safe. We will follow the [ICO's guidance](#) for the use of CCTV, and comply with data protection principles.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use. CCTV cameras will only be located where their use is justified and will not be positioned in a way that intrudes unreasonably on privacy.

The school recognises that photographs, video recordings and CCTV footage of identifiable individuals will usually constitute personal data and will therefore be processed in accordance with UK data protection law and the data protection principles.

The school will use photography, video and CCTV only where there is a clear and lawful basis for doing so, and will ensure that such use is necessary, proportionate and transparent. Further detail on the operation, management and review of surveillance systems is set out in the CCTV Policy.

Any enquiries about the CCTV system should be directed to the Head Teacher.

Photographs and Videos

As part of our school activities, we may take photographs and record images of individuals within our school.

We will obtain written consent from parents/carers, or pupils aged 18 and over, for photographs and videos to be taken of pupils for communication, marketing and promotional materials.

Where we need parental consent, we will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Where we don't need parental consent, we will clearly explain to the pupil how the photograph and/or video will be used.

Any photographs and videos taken by parents/carers at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos with other pupils are not shared publicly on social media for safeguarding reasons, unless all the relevant parents/carers (or pupils where appropriate) have agreed to this.

Where the school takes photographs and videos, uses may include:

-  Within school on notice boards and in school magazines, brochures, newsletters, etc.
-  Outside of school by external agencies such as the school photographer, newspapers, campaigns
-  Online on our school website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

Artificial Intelligence (AI)

The school recognises that generative AI technologies involve the processing of extensive datasets and may pose increased risks to data privacy and security.

Generative AI tools used by the school will comply with data protection legislation and the school will ensure that providers meet the DfE's 'Generative AI: product safety standards'.

To protect data when using generative AI tools, staff members and pupils will:

-  Seek advice from the DPO or Data leads as appropriate
-  Check the type of tool being used is approved by the school
-  Understand how the tool uses personal data and whether this adheres to this policy
-  Acknowledge or reference the use of generative AI in their work in line with the Trust's AI policy
-  Fact-check results to make sure the information is accurate

Staff and pupils must not input personal, identifiable, or sensitive data into generative AI platforms unless the system has been formally assessed, and explicit approval has been granted following a full Data Protection Impact Assessment (DPIA).

If personal data is entered into an AI tool, the person doing this will first check with the DPO or data lead that it is safe and appropriate to do so. To avoid a data breach, personal data will be protected within the tool and not used to further train the AI.

Use of generative AI tools must comply with the school's AI policy. Individuals must not rely solely on AI-generated outputs without appropriate human oversight and validation.

Any incidents, breaches, or concerns arising from the use of AI tools must be reported immediately to the DPO and will be investigated in line with the school's data breach procedures.

Further detail on the use of generative AI tools are outlined in the school's AI Policy.

Use of Personal Data in Automated Decision Making and Profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Data Protection by Design and Default

We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

-  Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge

- 🔒 Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law
- 🔒 Completing privacy impact assessments where the Trust's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process)
- 🔒 Integrating data protection into internal documents including this policy, any related policies and privacy notices
- 🔒 Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance
- 🔒 Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
- 🔒 Appropriate safeguards being put in place if we transfer any personal data outside of the UK, where different data protection laws may apply
- 🔒 Maintaining records of our processing activities, including:
 - 🔒 For the benefit of data subjects, making available the name and contact details of our school and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)
 - 🔒 For all personal data that we hold, maintaining an internal record of the type of data, type of data subject, how and why we are using the data, any third-party recipients, any transfers outside of the EEA and the safeguards for those, retention periods and how we are keeping the data secure

Data Protection Impact Assessments (DPIAs)

DPIAs will be used in certain circumstances to identify the most effective method of complying with the school's data protection obligations and meeting individuals' expectations of privacy.

DPIAs will allow the school to identify and resolve problems at an early stage, thus reducing associated costs and preventing damage from being caused to the school's reputation which might otherwise occur. A DPIA will be conducted when using new technologies or when the processing is likely to result in a high risk to the rights and freedoms of individuals, and will be used for more than one project, where necessary.

High risk processing includes, but is not limited to, the following:

- 🔒 Systematic and extensive processing activities, such as profiling
- 🔒 Large scale processing of special categories of data or personal data which is in relation to criminal convictions or offences
- 🔒 The use of CCTV

The school will ensure that all DPIAs include the following information:

- 🔒 A description of the processing operations and the purposes
- 🔒 An assessment of the necessity and proportionality of the processing in relation to the purpose
- 🔒 An outline of the risks to individuals
- 🔒 The measures implemented in order to address risk

DPIAs will be conducted prior to the implementation of any generative AI tools where the processing of personal data is involved, particularly if the AI tool automates decision-making, involves profiling, or carries a risk of bias, inaccuracy, or data misuse.

A DPIA will include specific evaluation of the risks associated with AI systems, including fairness, accuracy, accountability, transparency, and security, in accordance with the DfE's 'Generative artificial intelligence in education (2025)' guidance.

Where a DPIA indicates high risk data processing, the school will consult the ICO to seek its opinion as to whether the processing operation complies with the UK GDPR.

Data Security and Storage of Records

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- ✿ Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use
- ✿ Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, or left anywhere else where there is general access
- ✿ Where personal information needs to be taken off site, staff must sign it in and out from the school office
- ✿ Passwords that are at least 10 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded that they should not reuse passwords from other sites
- ✿ Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- ✿ Staff, pupils or trustees who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment (see our ICT policy)
- ✿ Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected

Disposal of Records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the Trust's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

Personal Data Breaches

The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The headteacher will

ensure that all staff are made aware of, and understand, what constitutes a data breach as part of their training.

Effective and robust breach detection, investigation and internal reporting procedures are in place at the school, which facilitate decision-making in relation to whether the relevant supervisory authority or the public need to be notified.

Where the school faces a data security incident, the DPO will coordinate an effort to establish whether a personal data breach has occurred, assess the significance of any breach, and take prompt and appropriate steps to address it.

All notifiable breaches will be reported to the relevant supervisory authority within 72 hours of the school becoming aware of it. Where a breach is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed, and the individuals concerned will be contacted directly. A 'high risk' breach means that the threshold for notifying the individual is higher than that for notifying the relevant supervisory authority. The risk of the breach having a detrimental effect on the individual, and the need to notify the relevant supervisory authority, will be assessed on a case-by-case basis. In the event that a breach is sufficiently serious, the public will be notified without undue delay.

Within a breach notification to the supervisory authority, the following information will be outlined:

- ✿ The nature of the personal data breach, including the categories and approximate number of individuals and records concerned
- ✿ The name and contact details of the DPO
- ✿ An explanation of the consequences of the personal data breach
- ✿ A description of the proposed measures to be taken to deal with the personal data breach
- ✿ Where appropriate, a description of the measures taken to mitigate any possible adverse effects

Where notifying an individual about a breach to their personal data, the school will provide specific and clear advice to individuals on the steps they can take to protect themselves and their data, where possible and appropriate to do so.

The school will ensure all facts regarding the breach, the effects of the breach and any decision-making processes and actions taken are documented in line with the UK GDPR accountability principle and in accordance with the Records Management Policy.

Failure to report a breach when required to do so may result in a fine, as well as a fine for the breach itself.

The school will work to identify the cause of the breach and assess how a recurrence can be prevented, e.g. by mandating data protection refresher training where the breach was a result of human error.

Training

All staff and trustees are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

Complaints

We take any complaints about how we collect and use personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance. You can make a complaint to us at any time by contacting our Data Protection Lead Mrs A Cannon.

Upon receiving a complaint, we will:

-  Acknowledge receipt of the complaint within 30 days of receiving it
-  Without undue delay, take appropriate steps to respond to the complaint, including:
 -  Making appropriate enquiries based on the circumstances of the complaint.
 -  Keeping the complainant informed on the progress of the investigation.
-  Without undue delay, inform the complainant of the outcome of the investigation.

Monitoring Arrangements

The board of trustees is responsible for monitoring and reviewing this policy.

This policy will be reviewed annually and approved by the full board of trustees.

Links with Other Policies

This data protection policy is linked to our:

-  AI (Artificial Intelligence) Policy
-  CCTV Policy
-  Freedom of information publication scheme
-  ICT Policy
-  Records Management Policy
-  Safeguarding Children Policy