

POLICY TITLE: Data Protection
STATUS: Statutory
DATE OF REVIEW: September 2025



1. Introduction

The Latimer Arts College collects and uses personal information about staff, students, parents and carers and other individuals who come into contact with the School. This information is gathered in order to enable it to provide education and other associated activities. In addition, there may be a legal requirement to collect and use information to ensure that the School complies with its statutory obligations.

Schools have a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website. Schools also have a duty to issue a Privacy Notice to all students/parents/carers. This summarises the information held on students, why it is held and the other parties to whom it may be passed on.

2. Purpose

This policy sets out how Latimer Arts College collects, uses, stores, and protects personal data about pupils, parents/guardians, staff, governors, volunteers, and other individuals.

It applies to all staff, contractors, governors, and volunteers who handle personal data on behalf of the school, whether in electronic, paper, or other forms.

3. Legal Framework

This policy meets the requirements of:

- The UK General Data Protection Regulation (UK GDPR) / EU GDPR
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- Statutory guidance from the Department for Education (DfE)
- Other relevant legislation and guidance

4. Data Protection Principles

The school will ensure that all personal data is:

- Lawful, fair, and transparent – processed lawfully and in a way that individuals understand.
- Limited to the purpose – collected for specified, explicit, and legitimate purposes.
- Data minimisation – adequate, relevant, and limited to what is necessary.
- Accurate – kept up to date and corrected where necessary.
- Storage limitation – retained only for as long as necessary.
- Integrity and confidentiality – kept secure to prevent unauthorised or unlawful processing, loss, or damage.
- Accountability – the school takes responsibility for compliance and can demonstrate it.

5. Roles and Responsibilities

- Governing Body/Board of Trustees – Ensures the school complies with data protection law.
- Principal – Oversees policy implementation and ensures staff compliance.
- Data Protection Officer (DPO) – Monitors compliance, advises on obligations, and is the point of contact for the ICO and individuals.
- All Staff – Must follow this policy, complete training, and report data breaches.

6. Types of Personal Data Collected

The school may collect and process the following types of personal data:

- Pupil data: names, contact details, attendance, academic progress, special educational needs, safeguarding information.
- Parent/guardian data: contact details, relationship to pupil, communication preferences.
- Staff data: HR records, payroll, qualifications, DBS checks.
- Other data: CCTV footage, visitor records, medical information where necessary.

7. Lawful Basis for Processing

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

- Consent
- Contractual obligation
- Legal obligation
- Vital interests (to protect life)
- Public task (in the public interest / official authority)
- Legitimate interests (in limited circumstances)

8. Data Sharing

The school may share data with:

- Local authorities
- The Department for Education (DfE)
- Exam boards
- Other schools or academies (if pupils transfer)
- Safeguarding partners, police, NHS, or social services (where required)
- Service providers and contractors (e.g., IT systems, catering, school photographers)

Data will only be shared when legally required or necessary to carry out school functions.

9. Data Security

The school will:

- Store personal data securely (locked cabinets, password-protected systems).
- Restrict access to authorised staff only.
- Encrypt sensitive information where appropriate.
- Provide regular training to staff on data handling and cyber security.
- Apply secure deletion/disposal of records when no longer required.

10. Retention of Data

The school follows the **Information and Records Management Society (IRMS) School Retention Schedule**. Data will only be kept for as long as necessary for its purpose and then securely deleted or destroyed.

11. Rights of Individuals

Under data protection law, individuals have the right to:

- Be informed about how their data is used.
- Access their personal data.
- Request rectification if inaccurate.
- Request erasure (where applicable).
- Restrict or object to processing (in some cases).
- Request data portability (in some cases).

Requests will be managed within statutory timescales (usually one month).

12. Data Breaches

All staff must report any actual or suspected data breach immediately to the DPO. The DPO will investigate and, if necessary, report to the ICO within 72 hours in line with legal requirements.

13. Training and Awareness

All staff will receive regular training on data protection and information security. New staff will receive induction training covering this policy.

14. Monitoring and Review

This policy will be reviewed annually or sooner if required by legislation or guidance. The Governing Body approves the policy and ensures ongoing compliance.

15. Contact

For queries or to exercise data protection rights, contact:

Data Protection Officer (DPO): Lisa Fleckney lfleckney@latimer.org.uk

16. Complaints

Complaints will be dealt with in accordance with the School complaints policy and should be addressed in writing to the Principal. Complaints relating to information handling or complaints that cannot be resolved using the School complaints handling procedures may be referred to the Information Commissioner (the statutory regulator).

Further advice and information is available from the Information Commissioner's Office, www.ico.org.uk or telephone 0303 123 1113.