



# Data Protection and Privacy Policy

Holy Trinity Church of England (C) Primary School

*Be Curious, Be Inspired, **Belong.***

At Holy Trinity, we want every pupil to grow into a curious thinker, an inspired learner, and a valued member of our school community. Our children will know they are seen, loved, and supported to thrive. They develop the character and confidence to show kindness, courage, respect, responsibility, perseverance, and togetherness. Through exploring new ideas and contributing positively to school life, our pupils flourish academically, socially, and spiritually as they prepare for life in today's Britain.

*Matthew 19 verse 14*

*"Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these."*

## Our School Values

- Kindness
- Courage
- Respect
- Responsibility
- Perseverance
- Togetherness



Courage



Kindness



Respect



Responsibility



Perseverance



Togetherness

## 1. Policy Statement

Holy Trinity Church of England (Controlled) Primary School is committed to protecting the personal data of pupils, parents and carers, staff, governors and visitors. The school processes personal data in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018.

The school acts as a **Data Controller** and is responsible for ensuring that personal data is processed lawfully, fairly, transparently and securely.

## 2. Scope

This policy applies to all personal data processed by the school, whether held electronically, on paper or in any other format. It applies to all staff, governors, volunteers, contractors and third parties who process data on behalf of the school.

Compliance with this policy is mandatory.

## 3. Roles and Responsibilities

- **Headteacher and Data Controller**  
The Headteacher, **Jade Wakefield**, has overall responsibility for data protection compliance within the school.
- **Data Protection Officer (DPO)**  
The school's Data Protection Officer service is provided by Staffordshire County Council. The DPO supports the school by providing advice, monitoring compliance and acting as a point of contact.
- **All staff and governors**  
All staff and governors are responsible for handling personal data securely and in line with this policy and related procedures.

## 4. Lawful Bases for Processing

The school processes personal data under one or more of the lawful bases set out in UK GDPR, including:

- Legal obligation where processing is required by law
- Public task where processing is necessary for the school to carry out its official functions
- Contract where processing is required for employment or service provision
- Consent where clear permission has been given for a specific purpose

Where consent is used, it may be withdrawn at any time.

## 5. Data Protection Principles

All personal data processed by the school is handled in line with the following principles:

- Data is processed lawfully, fairly and transparently
- Data is collected for specified, explicit and legitimate purposes
- Data is adequate, relevant and limited to what is necessary
- Data is accurate and kept up to date
- Data is kept only for as long as necessary
- Data is processed securely and protected against unauthorised access, loss or damage

## **6. Privacy Notices and Fair Processing**

The school provides clear Privacy Notices to pupils, parents and carers, staff and others whose data we process. These notices explain what data is collected, how it is used, who it is shared with, how long it is kept and the rights individuals have.

Privacy Notices are written in clear language and are available on the school website.

## **7. Sharing Personal Data**

Personal data is shared only where it is lawful and necessary. This may include sharing information with:

- Staffordshire County Council
- The Department for Education
- Ofsted
- Health services
- Examining bodies
- Other schools during pupil transfer
- Social care services and safeguarding partners
- The Lichfield Diocese Education Department

Data sharing is limited to what is necessary and appropriate. Where consent is required, it will be obtained in advance.

The school will not disclose information where doing so would cause serious harm, compromise safeguarding, identify third parties without consent or breach statutory exemptions.

## **8. Data Security**

The school implements appropriate technical and organisational measures to protect personal data, including:

- Secure electronic systems and password protected access
- Locked storage for paper records

- Restricted access to sensitive information
- Regular staff training
- Data protection impact assessments where required

Any third party processing data on behalf of the school must demonstrate appropriate security arrangements.

## **9. Subject Access Requests**

Individuals have the right to request access to personal data held about them or their child.

Requests must be made in writing and will be responded to within one month, in line with UK GDPR requirements.

Requests should be addressed to the Headteacher.

Personal data will not be disclosed to third parties without consent unless there is a legal obligation or safeguarding requirement.

## **10. Data Transfers and Pupil Records**

When a pupil transfers to another school, relevant educational, safeguarding and welfare information will be securely transferred to support continuity of education and care.

## **11. Right to Erasure**

Where personal data is no longer required for its original purpose and no lawful basis applies, individuals may request that processing stops and data is securely erased. Requests will be considered in line with statutory retention requirements.

## **12. Photographs and Video**

Photographs and video may be taken for educational purposes and internal school use. Images will not be used externally without appropriate consent.

Parents, visitors and external parties are not permitted to take photographs or video of pupils or staff on site without prior permission.

## **13. Data Handling and Storage**

- Paper records are stored securely and out of sight
- Medical information requiring immediate access is stored securely but accessibly
- Personal data should not be removed from the school site unless absolutely necessary
- Where data is transported, it must be protected and secure

Staff must follow school procedures when printing, storing, transporting or accessing personal data.

## **14. Data Disposal**

The school ensures the secure disposal of data that is no longer required. This includes shredding paper records, secure deletion of electronic data and the use of approved disposal services for IT equipment.

All disposal is carried out in line with Information Commissioner guidance and recognised standards.

## **15. Data Breaches**

All data breaches must be reported immediately to the Headteacher. Where required, breaches will be reported to the Information Commissioner's Office within 72 hours

## **16. Monitoring and Review**

This policy is reviewed regularly to ensure it remains compliant with legislation and guidance.

**Reviewed and Updated:** January 2026

**Next Review Due:** January 2028