



General Data Protection Policy

Date published: 01.09.2022

Reviewed: 30.09.24

Next review: September 2025

Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents and carers, governors, 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 GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests.

In addition, this policy complies with regulation 5 of the Education (Pupil Information) (England) Regulations 2005, which gives parents the right of access to their child's educational record.

| Term | Definition |
|--|---|
| Personal Data | <p>Any information relating to an identified, or identifiable, individual. This may include the individual's:</p> <ul style="list-style-type: none"> • Name (including initials). • Identification number. • Location data. • Online identifier, such as a username. <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural, or social identity.</p> |
| Special Categories of Personal Data | <ul style="list-style-type: none"> • 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 | <p>Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.</p> <p>Processing can be automated or manual.</p> |
| Data Subject | <p>The identified or identifiable individual whose personal data is held or processed.</p> |



| | |
|-----------------------------|---|
| 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

Our school processes personal data relating to parents, pupils, staff, governors, visitors, and others, and therefore is a Data Controller.

The Davenport School is within Ethelbert Children's Services (ECS). ECS is registered as a Data Controller with the ICO (Registration Number Z733553X) and will renew this registration annually or as otherwise legally required.

Roles and responsibilities

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

Proprietor

The Chair of the Proprietor Body, Gordon Shaw, has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

Data Protection Officer

The Data Protection Officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the governing board, where relevant, report to the board their advice and recommendations on school data protection issues.

The DPO is also the first point of contact for individuals whose data the school processes, and for the ICO. Full details of the DPO's responsibilities are set out in their job description.

Our DPO is Leslie Davenport and is contactable via Leslie.Davenport@ethelbert.net

Head Teacher

The Head Teacher acts as the representative of the Data Controller on a day-to-day basis.