Ashgate Primary School
Data Protection and Information Governance Policy 2026–2027

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This policy replaces the previous data-protection-and-freedom-of-information-policy-september-2025 and reflects current UK GDPR and Data Protection Act 2018 requirements.

Approved by:	**Governing Body**	**Date:**
Last reviewed on:	**November 2026**	
Next review due by:	**November 2027**	

1. Statement of Intent

At Ashgate Primary School, we are committed to protecting the privacy, confidentiality and security of the personal information entrusted to us by our pupils, families, staff, governors, volunteers and visitors.

The school recognises its responsibilities under:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Privacy and Electronic Communications Regulations (PECR)
- Human Rights Act 1998
- Keeping Children Safe in Education (KCSIE)
- Education Acts and associated statutory guidance

We will ensure that all personal data is processed lawfully, fairly and transparently and that robust systems are in place to maintain confidentiality, integrity and security.

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2. Aims

This policy aims to:

- Protect the rights of individuals whose personal information we hold.
- Ensure compliance with data protection legislation.
- Promote good information handling practices.
- Protect individuals from harm caused by misuse of personal information.
- Establish clear procedures for managing information securely.
- Support the school's safeguarding responsibilities whilst respecting privacy rights.

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3. Scope

This policy applies to:

- Pupils
- Parents and carers
- Employees
- Governors
- Volunteers
- Contractors
- Agency staff
- Visitors
- Any individual whose personal data is processed by the school

This policy applies to all forms of information including:

- Electronic records
- Paper records
- Emails
- CCTV footage
- Photographs
- Audio recordings
- Online systems

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4. Definitions

Personal Data

Information that identifies a living individual, including:

- Names
- Addresses
- Contact details
- Dates of birth
- Photographs
- Attendance information
- Educational records

Special Category Data

Additional protection applies to information regarding:

- Health and medical needs
- Ethnicity
- Religious beliefs
- Biometric information
- SEND information
- Safeguarding records

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5. Data Protection Principles

Ashgate Primary School will ensure that personal data is:

Lawful, Fair and Transparent

Data will only be used when there is a lawful basis to do so.

Collected for Specified Purposes

Data will only be used for legitimate educational and operational purposes.

Adequate, Relevant and Limited

Only information necessary for its purpose will be collected.

Accurate

Reasonable steps will be taken to ensure information remains correct and up to date.

Kept for No Longer Than Necessary

Records will be retained in accordance with statutory retention schedules.

Secure

Appropriate technical and organisational measures will protect personal information.

Accountable

The school will be able to demonstrate compliance with data protection legislation.

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6. Lawful Bases for Processing

The school processes personal information under one or more of the following lawful bases:

- Legal obligation
- Public task
- Vital interests
- Contract
- Consent
- Legitimate interests (where applicable)

Most educational records are processed under legal obligation or public task rather than consent.

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7. Roles and Responsibilities

Governing Body

The Governing Body is responsible for ensuring that:

- The school complies with data protection legislation.
- Policies are reviewed regularly.
- Resources are available to support compliance.

Headteacher

The Headteacher will:

- Promote a culture of data protection compliance.
- Ensure effective implementation of this policy.
- Report significant breaches where required.

Data Protection Officer

The DPO will:

- Advise on compliance matters.
- Monitor data protection practices.
- Support investigations.
- Liaise with the Information Commissioner's Office (ICO).

Staff

All staff must:

- Follow this policy.
- Maintain confidentiality.
- Complete required training.
- Report breaches immediately.
- Use school systems appropriately.

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8. Information Security

The school will:

Physical Security

- Secure paper records in locked storage.

- Restrict access to confidential information.
- Ensure secure disposal of sensitive documents.

Digital Security

- Use strong password protection.
- Implement multi-factor authentication where available.
- Encrypt portable devices where appropriate.
- Restrict access according to role.
- Maintain appropriate anti-virus protection.
- Use approved school systems and platforms.

Staff must not store school information on personal devices unless expressly authorised.

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9. Email and Electronic Communication

All users must:

- Use professional language.
- Verify recipients before sending information.
- Use BCC where appropriate.
- Send sensitive information securely.
- Report accidental disclosures immediately.

Personal email accounts must not be used for school business.

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10. Photographs, Videos and Images

The school may use photographs and images:

- For educational purposes.
- To celebrate achievement.
- To promote school activities.

Appropriate parental permissions will be obtained and recorded where required.

Images will be stored securely and used only for authorised purposes.

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11. CCTV

Ashgate Primary School operates CCTV systems to:

- Safeguard pupils and staff.
- Prevent crime and anti-social behaviour.
- Protect school property.

CCTV footage will:

- Be retained only for an appropriate period.
- Be accessed only by authorised persons.
- Be disclosed only where legally permitted.

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12. Sharing Information

The school may share information with:

- Derby City Council
- Department for Education (DfE)
- NHS services
- Social Care
- Police
- Educational settings
- External specialist providers

Information sharing will always be:

- Lawful
- Necessary
- Proportionate
- Recorded appropriately

Safeguarding concerns may be shared without consent where there is a lawful safeguarding basis for doing so.

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13. Subject Access Requests (SARs)

Individuals have the right to request copies of personal information held about them.

Requests should be made in writing to:

Headteacher
Ashgate Primary School

The school will normally respond within one calendar month in line with UK GDPR requirements.

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14. Individual Rights

Individuals may have the right to:

- Access their information
- Correct inaccurate information
- Request erasure in certain circumstances
- Restrict processing
- Object to processing
- Data portability (where applicable)
- Withdraw consent

Requests will be considered in accordance with legislation.

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15. Data Retention

The school follows the Information and Records Management Society (IRMS) retention schedules and Derby City Council guidance.

Records will be:

- Retained only for required periods.
- Securely archived where necessary.
- Destroyed confidentially when no longer required.

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16. Data Breaches

A data breach may include:

- Lost paperwork
- Misdirected emails
- Unauthorised access
- Cyber incidents
- Loss of devices

Any suspected breach must be reported immediately to:

1. Headteacher
2. School Business Manager
3. Data Protection Officer

The school will:

- Investigate promptly.
- Assess risk.
- Record findings.
- Notify the ICO where required.
- Inform affected individuals where necessary.

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17. Freedom of Information

Ashgate Primary School will comply with the Freedom of Information Act 2000.

Requests for non-personal information should:

- Be made in writing.
- Clearly specify the information requested.

The school will normally respond within 20 school days.

Personal information requests will be handled under UK GDPR rather than Freedom of Information legislation.

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18. Training

All staff will receive:

- Data protection induction training.
- Regular refresher training.
- Updates on legislative changes.
- Information security awareness training.

Staff with specific responsibilities will receive additional training as required.

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19. Monitoring and Compliance

The school will monitor compliance through:

- Policy reviews
- Audits
- Training records
- Security reviews
- Breach monitoring

Findings will be reported to senior leaders and governors where appropriate.

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20. Complaints

Individuals who are dissatisfied with the handling of their personal information should first raise concerns with the school.

If concerns remain unresolved, complaints may be made to:

Information Commissioner's Office (ICO)
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: www.ico.org.uk

Policy Review

This policy will be reviewed annually or sooner if:

- Legislation changes;
- ICO guidance is updated;
- Significant breaches occur;
- School procedures change.

Approved by: Governing Body
Headteacher: Mrs Wendy Forte
Review Date: September 2027