

Abbots Hall Primary Academy



GDPR Policy

Agreed by Governors: November 2025

Next Review Date: November 2026

Version control

Date	Version no.	Key changes from previous version
5/2018	V1	New policy
5/2019	V2	Adding DPO details to the policy and privacy statements
2/2/22	V3	Policy name changed from Data Protection Policy to GDPR policy
11/25	V4	Updated format of policy – key information moved to appendices for improved clarity

1. Introduction

Abbots Hall Primary Academy is committed to protecting the privacy and rights of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy sets out how we ensure compliance, safeguard personal information, and uphold the rights of pupils, parents, staff, and others.

2. Roles and Responsibilities

Data Controller: Abbots Hall Primary Academy

Data Protection Officer (DPO):

Lee Henley, Strategic Lead – Information Governance, Thurrock Council

Tel: 01375 652500

All staff are responsible for:

- Handling personal data securely.
- Reporting any data breaches immediately to the Headteacher and DPO.
- Following school procedures and training.
- Governors are responsible for monitoring compliance with this policy.

3. Data Protection Principles

We will process all personal data lawfully, fairly, and transparently, ensuring it is:

- Used only for specified, explicit purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Stored securely and only for as long as necessary.
- Processed with integrity and confidentiality.

4. Individual Rights

Under UK GDPR, individuals have the following rights:

1. To be informed about how their data is used.
2. To access their personal data.
3. To request rectification of inaccurate data.
4. To request erasure (the “right to be forgotten”).
5. To restrict processing.
6. To data portability.
7. To object to processing.
8. Rights in relation to automated decision-making and profiling.

How the school upholds these rights is set out in Appendix A.

5. Subject Access Requests (SARs)

- Requests must be made in writing (a form is available – see Appendix C).
- Proof of identity is required.
- Responses will normally be provided within one month (extendable to three months for complex cases).
- Requests may be refused where exemptions apply (see Appendix D).

6. Data Breaches

Any actual or suspected breach must be reported immediately to the Headteacher and DPO.

The school will:

- Investigate the breach.
- Notify the ICO within 72 hours where legally required.
- Inform affected individuals where there is a high risk to their rights and freedoms.

7. Data Sharing and Retention

- We will only share personal data with third parties where there is a lawful basis to do so.
- Personal data will not be routinely transferred outside the UK. Where data is hosted internationally by third-party processors, appropriate safeguards will be in place.
- Data will be kept in line with the school's Records Retention Schedule (Appendix E).

8. Complaints

Concerns about data protection should first be raised with the Headteacher or DPO.

If unresolved, complaints can be escalated to the Information Commissioner's Office (ICO):

Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Tel: 0303 123 1113 | www.ico.org.uk

9. Monitoring and Review

This policy will be reviewed annually or sooner if required by changes in legislation or guidance.

Appendix A – How We Uphold Individual Rights

1. The Right to be Informed

We publish clear privacy notices explaining who we are, why we hold data, legal basis, sharing arrangements, retention, rights, and complaints routes.

2. The Right of Access

Individuals can request copies of their personal data through a Subject Access Request (SAR). Requests are free, responded to within one month (or up to three for complex cases). Proof of identity is required.

3. The Right to Rectification

Individuals can request corrections to inaccurate or incomplete data within one month. Opinions are not changed, but concerns will be noted.

4. The Right to Erasure

Applies when data is no longer needed, consent is withdrawn, processing is unlawful, or legal obligations apply. May be refused if safeguarding or legal reasons require retention.

5. The Right to Restrict Processing

Processing may be limited but data still stored in certain cases (e.g., contested accuracy, unlawful processing).

6. The Right to Data Portability

Applies to data processed by consent/contract and automated means. Provided in a machine-readable format (e.g., CSV).

7. The Right to Object

Individuals may object to processing for legitimate interests, public tasks, direct marketing, or research. Direct marketing objections always upheld.

8. Rights Related to Automated Decision-Making & Profiling

The school does not currently use automated decision-making. Safeguards would be applied if this changes.

Appendix B: Privacy Notices

Abbots Hall Primary Academy is the Data Controller for the personal information we collect. This appendix sets out how we collect, use, store and share personal information for different groups of people.

All notices are in line with the **UK GDPR** and **Data Protection Act 2018**.

	What we collect	Why we use it	Who we share it with	Your rights
Pupil	<p>Contact details, including home address, email and phone numbers</p> <p>Date of birth and unique pupil number</p> <p>Characteristics (e.g. ethnicity, language, nationality, country of birth, free school meal eligibility)</p> <p>Attendance information (sessions attended, absences, reasons)</p> <p>Assessment results, progress records and behaviour logs</p> <p>Safeguarding information (court orders, professional involvement)</p> <p>Special educational needs (SEN) information</p> <p>Medical information</p>	<p>To support pupil learning and wellbeing</p> <p>To monitor and report on progress</p> <p>To provide appropriate pastoral care</p> <p>To assess the quality of our services</p> <p>To comply with the law regarding data sharing</p>	<p>The Department for Education (DfE)</p> <p>Local Authority services (e.g. SEND, admissions, safeguarding)</p> <p>NHS (school nursing service)</p> <p>External learning platforms (with parental consent)</p>	<p>You can ask what data we hold about you</p> <p>You can ask us to fix anything that is wrong</p> <p>You can sometimes ask us to delete your data or stop using it</p>
Parent/carer	<p>Names, addresses, telephone numbers and emails</p> <p>Relationship to pupil</p> <p>Contact preferences</p> <p>Financial details for payments, funding and eligibility checks</p>	<p>Communicate with you about your child's education and welfare</p> <p>Process admissions, attendance and safeguarding duties</p> <p>Deliver meals, trips, and extended services</p> <p>Comply with statutory obligations</p>	<p>Local Authorities, DfE, Ofsted, school meal providers, trip organisers, and IT service providers (for communication/learning platforms).</p>	
Workforce	<p>Personal identifiers (name, address, contact details)</p> <p>Employment history, qualifications and references</p> <p>DBS, safeguarding and identity checks</p> <p>Payroll and bank details</p>	<p>To manage employment and HR processes</p> <p>To meet safeguarding responsibilities</p> <p>To comply with safer recruitment and employment law</p>	<p>Local Authority HR/payroll services</p> <p>DfE (e.g. workforce census)</p> <p>Disclosure and Barring Service (DBS)</p> <p>Pension providers</p>	

	Performance and training records Absence and health information (where relevant)	To provide workforce development and appraisal		
Third Party	Business contact details Professional references Bank details for payment DBS status (where applicable)	Manage contracts and procurement Ensure safeguarding and site security Meet financial audit requirements		
Volunteer	Name, contact details, references DBS information Relevant skills/experience	Manage and support volunteers in school Safeguard pupils and comply with child protection law		

How We Store Data

All data is stored securely in line with our Retention & Disposal Schedule (Appendix C).

Your Rights

Under GDPR you have the right to:

- Be informed about how we use your data
- Access your data (Subject Access Request)
- Request rectification of inaccurate data
- Request erasure (where applicable)
- Restrict or object to processing
- Data portability (in limited circumstances)

How would you like to receive the information? Please select By email / paper copy

7. Consent:

I understand that in making this request to Abbots Hall Primary Academy they will hold the details of my request and will use the details I have provided. The details I have provided are accurate.

Signature: _____ Date: _____

OFFICE USE ONLY

Date received: _____ Taken by: _____

Appendix D – Exemptions to Disclosure

- Disclosure causing serious harm to health/wellbeing.
- Safeguarding risks or interference with investigation.
- Parental rights not established.
- Inadequate proof of identity.
- Requests that are manifestly unfounded or excessive.
- Information covered by legal professional privilege.
- Third-party data from police or local authority.
- Confidential references provided by the school.
- Factual records that are correct even if disputed.

If refused, we will explain reasons and advise on the right to complain to the ICO.

Appendix E – Records Retention Schedule

Pupil records	Until pupil reaches 25 years old.
Child protection records	Until pupil reaches 25 years old.
SEN files	Until pupil reaches 25 years old.
Staff records	6 years after employment ends.
Recruitment information	6 months for unsuccessful applicants.
Financial records	6 years minimum (HMRC requirement).
Health and safety records	3–40 years depending on type.

Data no longer required will be securely destroyed. Retention is reviewed annually in line with the IRMS Toolkit.

Appendix F – Digital Continuity Statement

The purpose and requirements for keeping personal information

Abbots Hall Primary Academy is committed to the protection and security of all information it is required to keep – in some cases this may be beyond a pupil's, staff members or governor's tenancy at the school. In light of this, Abbots Hall Primary Academy is required to keep a digital continuity statement pertaining to computerised information that must be kept for six or more years.

Should the school fail to retain this information, legal action may result in financial penalisation and/or negative press; it is for this reason that the school will retain relevant information for as long as it is required.

The information assets to be covered by the statement

The school understands the sensitivity of some information it is required to keep and ensures measures are in place to secure this information, in accordance with the school's Data Protection (DPA 2018) Policy and the DPA 2018.

To ensure the safety of the information and records, Abbots Hall Primary Academy will not store any personal information on flash drives (memory sticks). Abbots Hall Primary Academy understands the importance and sensitivity of some personal information and sees the use of flash drives as inappropriate due to the fact they can be easy to corrupt, lose or steal. Personal information will be stored on password protected external hard drives.

The individuals responsible for the preservation of personal information

Retention will be overseen by the following personnel:

- Person responsible for the digital continuity strategy, e.g. the headteacher
- Information asset owners

Should the any of the above personnel change, appropriate updates will be made to this and other affected policies and correspondence.

The appropriate supported file formats for long-term preservation, and when they need to be transferred

As agreed with the Computing coordinator, Microsoft Word documents will be converted into PDF files, to ensure the longevity of their accessibility – file formats should be converted as soon as possible, or within six months, to ensure their compatibility. Further specifications of file conversion are listed below:

Type of file	To be converted to
Microsoft Word document	PDF
Microsoft PowerPoint document	PDF
Microsoft Excel document	PDF
Images	JPEG
Videos and film, including CCTV	MOV/MP4

The retention of all software specification information and licence information

If it is not possible for the information created by an unsupported computer system to be converted to the supported file formats, the system itself should be ‘mothballed’ to preserve the files it has stored. If this is the case with any information, Abbots Hall Primary Academy will list the complete system specification for the software that has been used and any licence information which will allow the system to be retained in its entirety.

Personal information will be stored on password protected external hard drives, which will be kept in a locked filing cabinet – only the information asset owners and the Headteacher will have knowledge of these passwords

How access to the information asset is to be managed in accordance with the DPA 2018

To ensure the information is relevant to the school, and that recent files have been correctly converted, information asset owners will undertake regular archive checks of the information stored – timeframes are listed in the table below. In accordance with principle five of the DPA 2018, personal information should be “kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal information are processed”. Abbots Hall Primary Academy is committed to ensuring all personal information is checked regularly to ensure its relevance.

Timeframe	Type of check
Biannually	Relevance check
Annually	Compatibility check and, if required, back-up files created
At the end of the data’s lifecycle (at least every six years)	Check to ensure data is securely disposed of