



GDPR Policy

Approved by:	Great Steeping Primary School Board of Governors
Date:	December 2025
Review due:	December 2026 or earlier if guidance changes

1. Introduction

Great Steeping Primary School is required to keep and process certain information about its staff members and pupils and 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 is in place to ensure all staff and governors are aware of their responsibilities and outlines how we collect, use, store, and share personal data, and ensures that all data is handled lawfully, fairly, and transparently.

2. Scope

This policy applies to all staff, governors, volunteers, contractors, and third parties who process personal data on behalf of the school. It covers all personal data relating to pupils, parents/carers, staff, and other individuals.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Special Category Data:** Sensitive data requiring extra protection (e.g. health, ethnicity).
- **Processing:** Any operation performed on personal data (e.g. collection, storage, use).
- **Data Subject:** The individual whose data is being processed.
- **Data Controller:** The organisation that determines the purposes and means of processing personal data.
- **Data Processor:** A person or organisation that processes data on behalf of the controller.

4. Roles and Responsibilities

- **The Governing Body:** Ensures the school complies with data protection laws.
- **Headteacher:** Oversees data protection compliance and delegates responsibilities.
- **Data Protection Officer (DPO):** Provides advice and monitors compliance. The school's DPO is provided by Glen Thompson.

- **All Staff:** Must understand and follow this policy and report any concerns.

5. Legal framework

This policy has due regard to legislation, including, but not limited to the following:

- The General Data Protection Regulation
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- Data (Use and Access) Act 2025

6. Data Collection and Use

We collect personal data for purposes including:

- Pupil admissions and education
- Safeguarding and welfare
- Staff employment and payroll
- Communication with parents/carers
- Legal and statutory reporting

We ensure data is:

- Collected for specified, legitimate purposes
- Accurate and up to date
- Stored securely
- Retained only as long as necessary

7. Data Sharing

We may share personal data with:

- Local authorities
- Department for Education (DfE)

- NHS and health professionals
- Other schools (e.g. during transitions)
- External service providers (e.g. IT support, catering)

All data sharing is governed by data sharing agreements and complies with UK GDPR.

8. Data Subject Rights

Individuals have the right to:

- Be informed about data collection and use
- Access their personal data
- Rectify inaccurate data
- Erase data (in certain circumstances)
- Restrict or object to processing
- Data portability (where applicable)

Requests should be made in writing to the Headteacher or DPO.

9. Data Security

We implement appropriate technical and organisational measures to protect data, including:

- Password-protected systems
- Secure storage of paper records
- Staff training
- Access controls

10. Data Retention and Disposal

We retain personal data in line with [the IRMS Records Management Toolkit for Schools](#). Data is securely disposed of when no longer required.

Financial data is retained in line with the LCC Schools Finance Handbook Section F: Retention of Financial Records.

11. Subject Access Requests (SARs)

Individuals may request access to their personal data. SARs must be responded to within one calendar month. Requests should be submitted in writing to the Headteacher or DPO.

12. Data Breaches

Any data breach must be reported immediately to the Headteacher and DPO. Serious breaches will be reported to the [Information Commissioner's Office](#) (ICO) within 72 hours.

13. Monitoring and Review

This policy is reviewed annually or when significant changes occur. Staff are regularly trained and updated on data protection responsibilities.

Contact Details:

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