

**Treales CE Primary School**

**Data Protection Policy**

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| Last Updated | **Sept 25** |
| Updated by | **L Hill** |
| Approved by Governing Board | **December 2022** |
| Date to Review | **Sept 26** |

# **Data Protection Policy**

## **Scope**

This policy relates to all Treales CE Primary School employees (including voluntary, temporary, contract and seconded employees), who capture, create, store, use, share and dispose of information on behalf of Treales CE Primary School.  
  
These persons shall be referred to as 'Users' throughout this policy.  
  
Treales CE Primary School shall be referred to as ‘the school’ or ‘we’ throughout this policy.  
  
The following policy relates to all electronic and paper-based information.

## **Statement of Commitment**

In order to undertake our statutory obligations effectively, deliver services and meet customer requirements, the school needs to collect, use and retain information, much of which is personal, sensitive or confidential.  
  
Such information may be about:  
• Pupils  
• Parents and Guardians  
• Governors  
• Employees or their families  
• Members of the public  
• Business partners  
• Local authorities or public bodies  
  
We regard the lawful and correct treatment of personal data by the school as very important to maintain the confidence of our stakeholders and to operate successfully.  
  
As a Church of England school, we believe that every person is created in the image of God (Genesis 1:27). This informs our responsibility to handle personal data with integrity, respect, and care, recognising the dignity and value of all individuals.  
  
To this end, the school will ensure compliance, in all its functions, with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant legislation, including the Freedom of Information Act 2000 and Keeping Children Safe in Education (KCSIE) 2025.

## **Data Protection Principles**

The Principles of the UK GDPR state that personal information must be:  
  
1. Processed lawfully, fairly and in a transparent manner in relation to individuals.  
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.  
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.  
4. Accurate and, where necessary, kept up to date.  
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.  
6. Processed in a manner that ensures appropriate security of the personal data against unauthorised processing, accidental loss, destruction or damage, using appropriate technical or organisational measures.

## **Compliance with the Data Protection Principles and Legislation**

In order to comply with these principles and meet all data protection obligations as stipulated in data protection legislation, the school will:  
  
• Raise awareness of data protection across the school.  
• Offer data protection training to all employees and governors.  
• Create a data protection policy for the school that is updated annually.  
• Complete a personal data processing audit.  
• Maintain a risk register for data processing risks.  
• Review the school’s consent forms so they meet the higher standards of UK GDPR.  
• Ensure under-13s cannot consent to the processing of their own personal data for online services (with exceptions such as counselling services).  
• Register with the Information Commissioner’s Office as a data controller.  
• Appoint a Data Protection Officer.  
• Publish a privacy notice to inform individuals how we process their data.  
• Ensure data subjects can exercise their rights.  
• Amend supplier contracts to comply with legislation.  
• Implement technical and organisational controls to keep personal data secure.  
• Conduct Data Protection Impact Assessments where required.  
• Investigate all information security breaches and report to the ICO within 72 hours if necessary, and inform affected individuals where there is a high risk.  
• Carry out data quality checks.  
• Demonstrate compliance through audits and monitoring.  
• Support pseudonymisation and encryption of personal data.

## **Rights of the Individual**

The UK GDPR provides the following rights for individuals:  
  
• The right to be informed (via privacy notices).  
• The right of access (subject access requests within one month, free of charge).  
• The right of rectification (correct inaccurate data within one month).  
• The right to erasure (unless there is a legal obligation to retain the data).  
• The right to restrict processing.  
• The right to data portability (provide data in a structured, machine-readable format).  
• The right to object to processing (including profiling, direct marketing, or research).  
• Rights in relation to automated decision-making and profiling.  
• The right to withdraw consent at any time, where consent is the lawful basis for processing.  
  
The school will ensure that these rights can be exercised by all individuals.

## **Retention and Disposal**

The school will retain personal data only for as long as necessary in line with its retention schedule. When personal data is no longer required, it will be disposed of securely.

## **Contact**

Contact the Data Protection Officer:  
  
Email: bursar@treales.lancs.sch.uk  
Phone: 01772 684678  
Post: Treales CE Primary School, Church Road, Treales, PR4 3SH

# Appendix A: Records Retention Schedule

This Records Retention Schedule sets out the minimum periods for which records must be retained by Treales CE Primary School, to ensure compliance with legal, statutory, and safeguarding requirements. Records must be disposed of securely when they are no longer required.

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| Record Type | Retention Period | Notes / Legal Basis |
| Pupil Records | Date of birth + 25 years | In line with IICSA and KCSIE safeguarding requirements |
| Safeguarding / Child Protection Records | Date of birth + 25 years | Required by KCSIE 2025 and statutory guidance |
| Special Educational Needs (SEN) Files | Date of birth + 25 years | Linked to SEND Code of Practice |
| Accident / Incident Reports (Pupils) | Date of incident + 25 years | Health & Safety requirements |
| Attendance Registers | Date of register + 3 years | School attendance regulations |
| Curriculum Records | 3 years | Educational administration |
| Staff Personnel Files | Termination + 6 years | Employment law |
| Staff Training Records | Termination + 6 years | Employment and safeguarding requirements |
| Payroll and Salary Records | 6 years | HMRC requirements |
| Recruitment Records (unsuccessful candidates) | 6 months | Data minimisation under GDPR |
| Governors’ Minutes | Permanent | School governance compliance |
| Health and Safety Records | Date of record + 25 years | Statutory requirements |
| CCTV Footage | 30 days (unless required for investigation) | Data Protection Act 2018 & UK GDPR |

All retention periods will be reviewed annually to ensure compliance with statutory requirements, KCSIE 2025, and best practice guidance. Where a legal claim is anticipated, relevant records must be retained until the resolution of the claim, even if this exceeds the retention schedule.