



Cradley CE Primary School

Data Protection Policy 2025



Legal Obligations

Recital 74 of the General Data Protection Regulation (GDPR) states that:

"The responsibility and liability of the controller for any processing of personal data carried out by the controller or on the controller's behalf should be established. In particular, the controller should be obliged to implement appropriate and effective measures and be able to demonstrate the compliance of processing activities with the Regulation, including the effectiveness of the measures. Those measures should take into account the nature, scope, context and purposes of the processing and the risk to the rights and freedoms of natural persons."

Cradley CE Primary School and its Governing Body recognise their responsibilities as data controllers under the UK GDPR and the Data Protection Act 2018. This policy is adopted to ensure compliance with all relevant data protection legislation and guidance.

Scope

The school gathers and processes information about pupils, staff, parents, and other individuals in contact with the school to provide education and associated services. This includes the processing of special category data (e.g., racial or ethnic origin, religious beliefs, health information) only when lawful bases are identified and documented.

Whole-School Approach to Safeguarding and Data Protection

In line with Keeping Children Safe in Education 2025, data protection is embedded within the school's whole approach to safeguarding. All systems, policies, and processes operate with the best interests of the child at their heart. The school ensures that safeguarding and data protection are integrated and underpin all relevant policy development and practice.

Roles and Responsibilities

- The school has appointed a **Senior Information Risk Owner (SIRO), Mrs C Warford** to oversee information risk at senior leadership level.
- A **Designated Data Protection Officer (DPO), Mrs F Parkes** is responsible for ensuring compliance with data protection legislation and providing advice and support to staff.

- All staff, including volunteers and contractors, receive appropriate training and understand their responsibilities in handling personal data securely and lawfully.

Data Subject Rights

Data subjects (pupils, parents, staff) have rights under the UK GDPR, including:

- Right of access to their personal data.
- Right to rectification of inaccurate data.
- Right to erasure in certain circumstances.
- Right to restrict or object to processing.
- Right to data portability.

The school will facilitate these rights in a timely and transparent manner.

Data Collection, Use, and Sharing

- Personal data is collected and processed lawfully, fairly, and transparently, limited to what is necessary.
- The school will inform pupils and parents about data collection and use through clear and accessible privacy notices.
- In safeguarding contexts, the school may share personal information without consent where there is a lawful basis such as legal obligation or public task, always prioritising the child's welfare and safety.
- Data sharing is conducted securely and only with appropriate parties, in accordance with local multi-agency safeguarding arrangements.

Data Security and Retention

- The school implements technical and organisational measures to protect personal data from loss, damage, or unauthorised access.
- Data retention schedules are followed to ensure personal data is kept only as long as necessary and then securely disposed of.

Data Breach Management

- The school has procedures in place to detect, report, and investigate personal data breaches.
- Where a breach poses a risk to individuals' rights and freedoms, it will be reported to the Information Commissioner's Office (ICO) within 72 hours and affected individuals will be informed promptly.

Transparency and Communication

- The school maintains clear communication with data subjects about their data and how it is used.
- Privacy notices and this policy are accessible to all stakeholders and available in alternative formats if needed.
- Parents and carers will be informed about data sharing where safe and appropriate to do so.

Policy Review

This policy and associated procedures will be reviewed annually or more frequently if required by changes in legislation or school practice.

References and Further Guidance

For detailed guidance, please visit the Information Commissioner's Office (ICO) website: <https://ico.org.uk/>.

Contact Dudley Council's Information Governance Team

- **Email:** information.governance@dudley.gov.uk
- **Phone:** (01384) 815607

Sources:

- Keeping Children Safe in Education 2025, Part Two: Management of Safeguarding (paragraphs 92-101)
- Working Together to Safeguard Children 2023, Chapter 1: Information Sharing
- UK GDPR and Data Protection Act 2018
- ICO Guidance for Organisations (<https://ico.org.uk/>)