Blossom Federation

Daubeney, Sebright and Lauriston

Data Protection Policy and Privacy Notice

March 2026

Amendments	**Narrative**	**Date**
Legislative Changes Robin Warren	Updated to reflect the Data (Use and Access) Act 2025, UK GDPR, and latest DfE/ICO guidance	October 2025
Data Retention	Update to include data retention guidance	March 2026

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1. Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents, and visitors is collected, stored, and processed in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025 (DUAA).

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

This policy covers the Blossom Federation of Daubeney, Sebright & Lauriston Schools, Daubeney Child & Daily Hub and Sebright Children Centre.

2. Legislation and guidance

This policy meets the requirements of:

- UK GDPR
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Regulation 5 of the Education (Pupil Information) (England) Regulations 2005

It is based on guidance from the Information Commissioner's Office (ICO) and model privacy notices from the Department for Education (DfE).

In addition, this policy complies with regulation 5 of the Education (Pupil Information) (England) Regulations 2005, which gives parents the right of access to their child's educational record.

3. Definitions

Term	Definition
Personal data	Information that identifies a living individual, directly or indirectly
Sensitive personal data	Sensitive data such as racial or ethnic origin, political opinions, religious beliefs, health data, or sexual orientation
Processing	Any operation performed on personal data, including collection, storage, use, and deletion

Data subject	The individual whose personal data is being processed
Data controller	The organisation that determines the purposes and means of processing personal data
Data processor	A third party that processes personal data on behalf of the data controller
Digital Verification Services	Tools used to verify identity digitally, subject to DUAA compliance

4. The data controller

Our school processes personal information relating to pupils, staff and visitors, and, therefore, is a data controller. Our school delegates the responsibility of data controller to the Executive Head Teacher.

5. Data protection principles

We adhere to the principles of UK GDPR:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

6. Roles and responsibilities

- Governing Board: Ensures compliance with data protection laws.
- Executive Head Teacher: Oversees implementation and compliance.
- Data Protection Officer (DPO): Advises on compliance, monitors processing, and handles SARs.
- Staff: Must follow this policy and report any data breaches.

7. Privacy/fair processing notice

We provide clear, accessible, and age-appropriate privacy notices to:

- Pupils
- Parents/carers
- Staff
- Visitors

These notices explain:

- What data we collect
- Why we collect it
- How it is used and shared
- Legal bases for processing
- Rights under UK GDPR and DUAA

Privacy notices are reviewed annually and updated as needed.

7.1 Pupils and parents

We hold personal data about pupils to support teaching and learning, to provide pastoral care and to assess how the school is performing. We may also receive data about pupils from other organisations including, but not limited to, other schools, local authorities and the Department for Education.

This data includes, but is not restricted to:

- Contact details
- Results of internal assessment and externally set tests
- Data on pupil characteristics, such as ethnic group or special educational needs
- Exclusion information
- Details of any medical conditions

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about pupils with anyone without consent unless the law and our policies allow us to do so. Individuals who wish to receive a copy of the information that we hold about them/their child should refer to sections 8 and 9 of this policy.

We are required, by law, to pass certain information about pupils to specified external bodies, such as our local authority and the Department for Education, so that they are able to meet their statutory obligations.

7.2 Staff

We process data relating to those we employ to work at, or otherwise engage to work at, our school. The purpose of processing this data is to assist in the running of the school, including to:

- Enable individuals to be paid
- Facilitate safe recruitment
- Support the effective performance management of staff
- Improve the management of workforce data across the sector
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Support the work of the School Teachers' Review Body

Staff personal data includes, but is not limited to, information such as:

- Contact details
- National Insurance numbers
- Salary information

- Qualifications
- Absence data
- Personal characteristics, including ethnic groups
- Medical information
- Outcomes of any disciplinary procedures

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about staff with third parties without consent unless the law allows us to.

We are required, by law, to pass certain information about staff to specified external bodies, such as our local authority and the Department for Education, so that they are able to meet their statutory obligations.

Any staff member wishing to see a copy of information about them that the school holds should contact the Federation School Business Leader.

8. Subject access requests

Under the Data Protection Act 1998, pupils have a right to request access to information the school holds about them. This is known as a subject access request.

Under DUAA:

- SARs must be responded to within one month.
- The response period may be paused while clarification is sought.
- Only reasonable and proportionate searches are required.
- Mature pupils may submit SARs independently.

Requests should be submitted in writing to the DPO.

Subject access requests must be submitted in writing, either by letter, email or fax. Requests should include:

- The pupil's name
- A correspondence address
- A contact number and email address
- Details about the information requested

The school will not reveal the following information in response to subject access requests:

- Information that might cause serious harm to the physical or mental health of the pupil or another individual
- Information that would reveal that the child is at risk of abuse, where disclosure of that information would not be in the child's best interests
- Information contained in adoption and parental order records
- Certain information given to a court in proceedings concerning the child

Schools can now **pause the response clock** while waiting for clarification from the requester.

Only **"reasonable and proportionate" searches** are required.

Subject access requests for all or part of the pupil's educational record will be provided within 15 school days. The table below summarises the charges that apply.

Number of pages of information to be supplied	Maximum fee (£)
1-19	1.00
20-29	2.00
30-39	3.00
40-49	4.00
50-59	5.00
60-69	6.00
70-79	7.00
80-89	8.00
90-99	9.00
100-149	10.00
150-199	15.00
200-249	20.00
250-299	25.00
300-349	30.00
350-399	35.00

400-449	40.00
450-499	45.00
500+	50.00

If a subject access request does not relate to the educational record, we will respond within 40 calendar days. The maximum charge that will apply is £10.00.

9. Parental requests to see the educational record

Personal data about a child belongs to that child, and not the child's parents. This is the case even where a child is too young to understand the implications of subject access rights.

For a parent to make a subject access request, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

The Information Commissioner's Office, the organisation that upholds information rights, generally regards children aged 12 and above as mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents of pupils at our school may be granted without the express permission of the pupil.

Requests must be made in writing and will be responded to within 15 school days.

10. Storage of records

- Paper-based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept under lock and key when not in use
- Papers containing confidential personal information should not be left on office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access
- Where personal information needs to be taken off site (in paper or electronic form), staff must sign it in and out from the school office
- Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures for school-owned equipment

11. Disposal of records

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely.

For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic records.

12. Training

Data protection will form part of continuing professional development, where changes to legislation or the school's processes make it necessary.

13. The General Data Protection Regulation

We acknowledge that the law changed on the rights of data subjects and that the General Data Protection Regulation in May 2018.

We will continue to review working practices and provide training to members of staff and governors where appropriate.

14. Monitoring arrangements

The Federation School Business Leader is responsible for monitoring and reviewing this policy.

This document will be reviewed **every 2 years**.

At every review, the policy will be shared with the governing board.

Annex - Data Retention Schedule:

Typical data retention periods (schools – England)

1. Staff appraisal, capability & pay

Record type	Typical retention period	Rationale
Appraisal / performance management records	**6 years after the end of employment**	Limitation period for employment claims
Pay progression / salary determinations	**6 years after the end of employment**	Contractual and employment claims
Capability procedure records	**6 years after end of employment**	Employment tribunal limitation period
Grievance records (including pay grievances)	**6 years after resolution / end of employment**	Legal defence
Disciplinary records – warning (expired)	**6 months–2 years** (depending on policy)	Proportionality
Disciplinary records – dismissal / gross misconduct	**6 years after dismissal**	Legal proceedings
Appeal outcomes (pay, appraisal, capability)	**6 years after decision / end of employment**	Tribunal risks

2. Employment & HR core records

Record type	Retention period
Employment contracts	6 years after employment ends
Personnel file (general)	6 years after employment ends
Recruitment records (unsuccessful candidates)	6–12 months
Right-to-work checks	2 years after employment ends

Payroll records	6 years (HMRC requirement)
Pension records	Up to 75 years (depending on scheme eleme

3. Governance records

Record type	Retention period
Governing body / committee minutes	**Permanent**
Approved policies (superseded versions)	**6 years after replacement**
Policy consultation drafts	Until superseded
Pay committee papers	6 years

4. Safeguarding (for context)

Record type	Retention period
Child protection files	Until child's 25th birthday (or longer if req