

Data Protection Policy

Document Control Page

Revision History

Date	Type of change	Initials	Purpose of Revision
September 2018	Major	AR	Reflecting changes re GDPR
September 2019	Minor	MM	Date changed in footer
September 2020	Minor	MM	Date changed in footer
September 2021	Minor	MM	Date changed in footer
September 2022	Minor	KS	Date changed in footer
November 2023	Minor	KS	Date changed in footer
December 2024	Minor	KS	Date changed in footer
September 2025	Minor	MP	Date change and DPO Name change.

Hatch Warren Infant School

Data Protection Policy

Introduction

Hatch Warren Infant School collects and uses personal information (referred to in the UK General Data Protection Regulation (UK GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer (DPO), Maria Pouney, who may be contacted at:

 dpo@hwis.hants.sch.uk

The school issues Privacy Notices (also known as Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purposes for which it is held, and who it may be shared with. They also provide information about an individual's rights in respect of their personal data.

Purpose

This policy sets out how the school deals with personal information correctly and securely, in accordance with the UK GDPR and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the school, whether held on paper or electronically.

What is Personal Information / Data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, by reference to details such as a name, identification number, location data, an online identifier, or factors relating to their physical, physiological, genetic, mental, economic, cultural, or social identity.

Personal data includes (but is not limited to) an individual's name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The UK GDPR establishes six key principles and additional duties that must be complied with at all times:

1. Lawfulness, fairness and transparency - Personal data shall be processed lawfully, fairly and in a transparent manner.
2. Purpose limitation - Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in incompatible ways.
3. Data minimisation - Personal data shall be adequate, relevant and limited to what is necessary.
4. Accuracy - Personal data shall be accurate and kept up to date where necessary.

5. Storage limitation - Personal data shall not be retained longer than necessary.
6. Integrity and confidentiality - Personal data shall be processed securely, protecting against unauthorised access, loss or damage.

Duties

- Personal data shall not be transferred outside the UK or EU/EEA unless adequate safeguards are in place.
- The school, as Data Controller, has a general duty of accountability for personal data.

Commitment

The school is committed to maintaining the principles and duties of the UK GDPR at all times. Therefore, the school will:

- Inform individuals of the Data Controller and Data Protection Officer contact details.
- Clearly state the purposes and lawful basis for data collection.
- Inform individuals when their data is shared, and with whom.
- Notify individuals if data is transferred outside the UK/EU/EEA, with details of safeguards.
- Respect and facilitate individuals' rights under UK GDPR.
- Provide details of retention periods or access to the Retention Schedule.
- Ensure accuracy and regular review of personal information.
- Ensure robust safeguards to protect data from misuse or unauthorised disclosure.
- Securely destroy data when no longer required.
- Respond to Subject Access Requests (SARs) promptly.
- Provide data protection training to staff and governors.


Retention and Disposal of Personal Data

The school maintains a Retention Schedule, specifying how long different categories of data are retained. Personal data will be disposed of securely in line with this schedule (e.g. shredding, confidential waste disposal, or secure electronic deletion).

Complaints

Complaints will be managed under the school's Complaints Policy.

If an individual is dissatisfied with the handling of their personal data, they may raise the matter with the Information Commissioner's Office (ICO):

 Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

 www.ico.org.uk

Review

This policy will be reviewed at least annually, or sooner if required by changes in legislation or best practice. The review will be led by the Data Protection Officer and agreed by the Governing Body.

Contacts

For any enquiries relating to this policy, please contact:

Maria Pouney

Data Protection Officer

 dpo@hwis.hants.sch.uk