

## GDPR Policy



Written by	Jamie Chapman	April 2025
Next review due by		April 2026

## **GDPR and Data Protection Policy**

### **1. Introduction**

Earley Springs is committed to protecting the privacy and security of personal data. We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy outlines our approach to data protection and how we ensure compliance.

### **2. Scope**

This policy applies to all staff, students, parents/guardians, volunteers, contractors, and any third parties who have access to personal data held by the school.

### **3. Data Protection Principles**

We adhere to the following principles when processing personal data:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

### **4. Types of Data Collected**

We collect and process the following types of personal data:

- Student information (name, date of birth, medical history, SEND requirements, attendance records, assessment data, safeguarding concerns)
- Parent/guardian information (contact details, emergency contacts, consent records)
- Staff information (employment details, payroll information, qualifications, DBS checks)
- Third-party contractor details (company name, contact details, agreements)

### **5. Legal Basis for Processing Data**

We only process personal data when we have a legal basis to do so, including:

- Consent obtained from individuals
- Compliance with a legal obligation
- Protection of vital interests
- Performance of a task carried out in the public interest
- Legitimate interests pursued by the school, provided they do not override individual rights

### **6. Data Security Measures**

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

- Secure storage of physical and electronic records

- Access control and encryption
- Regular staff training on data protection
- Data breach response procedures

## **7. Data Retention and Disposal**

We retain personal data for as long as necessary to fulfill the purposes for which it was collected. When data is no longer required, it is securely deleted or destroyed.

## **8. Data Sharing and Third Parties**

We only share personal data with third parties when legally required or with appropriate safeguards in place, including:

- Local authorities and government agencies
- Examination boards and regulatory bodies
- Healthcare professionals (for SEND support)
- Approved contractors providing essential services

## **9. Individual Rights**

Individuals have the following rights under GDPR:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure (in certain circumstances)
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision-making and profiling

## **10. Data Breaches**

In the event of a data breach, we will:

- Assess the nature and impact of the breach
- Contain and mitigate any risks
- Notify affected individuals and the Information Commissioner's Office (ICO) if necessary
- Review and improve security measures to prevent recurrence

## **11. Contact and Complaints**

For any data protection queries or concerns, please contact our Data Protection Officer (DPO):

### **Data Protection Officer**

Earley Springs

Harriet Carter

Email: [harriet@earleyspringsschool.com](mailto:harriet@earleyspringsschool.com)

If you are not satisfied with our response, you have the right to lodge a complaint with the ICO.

## **12. Policy Review**

This policy is reviewed annually or as required to reflect changes in legislation or school practices.