



Fulwood and Cadley Primary School

Data Protection Policy

September 2025 Update

1. Introduction

This policy applies to all Fulwood and Cadley Primary School employees (including voluntary, temporary, contract, and seconded staff) who capture, create, store, use, share, or dispose of information on behalf of the school. This covers both electronic and paper-based information.

We are committed to the lawful and correct treatment of personal data, ensuring compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and all other relevant legislation and guidance issued by the **Information Commissioner's Office (ICO)**.

2. Statement of Commitment

The school collects, uses, and retains information to deliver services and meet statutory obligations. This includes information about:

- Pupils
- Parents and guardians
- Governors
- Employees and their families
- Members of the public
- Business partners
- Local authorities and public bodies

We are committed to ensuring that personal data is processed lawfully, fairly, and transparently.

3. Data Protection Principles

In line with the UK GDPR and Data Protection Act 2018, personal data must be:

1. Processed lawfully, fairly, and transparently.
 2. Collected for specified, explicit, and legitimate purposes.
 3. Adequate, relevant, and limited to what is necessary.
 4. Accurate and kept up to date.
 5. Retained only as long as necessary.
 6. Secured against unauthorised or unlawful processing, loss, destruction, or damage.
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4. Legal Bases for Processing

The school processes data under lawful bases including:

- Consent
- Contractual necessity
- Legal obligations (e.g., Education Acts)
- Vital interests (e.g., safeguarding)
- Public task (education services)
- Legitimate interests (where appropriate)

Special category data (e.g., health, race, religion) will only be processed under the stricter UK GDPR conditions.

5. Individual Rights

We recognise and uphold the following rights under the UK GDPR:

- Right to be informed (via privacy notices)
- Right of access (subject access requests – free, one month deadline)
- Right to rectification (within one month)
- Right to erasure (unless legal obligations apply)
- Right to restrict processing
- Right to data portability
- Right to object (e.g., marketing, profiling)
- Rights in relation to automated decision-making and profiling

Requests will be managed in accordance with ICO guidance.

6. International Data Transfers

Personal data transferred outside the UK will be protected using:

- **UK International Data Transfer Agreement (IDTA)**, or
- **UK Addendum to the EU Standard Contractual Clauses (SCCs)**

We will ensure adequate safeguards for all international transfers.

7. Compliance and Accountability

The school will:

- Raise awareness and provide regular training for staff and governors.
- Maintain a **Record of Processing Activities (ROPA)**.
- Conduct **Data Protection Impact Assessments (DPIAs)** where required.
- Ensure suppliers meet UK GDPR standards via contractual agreements.

- Investigate all data breaches and, if required, report to the ICO within 72 hours.
 - Apply pseudonymisation, encryption, and access controls where appropriate.
 - Conduct annual reviews of this policy and data protection procedures.
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8. Children's Data

As a primary school, we handle large volumes of children's personal data. We comply with the **Children's Code (Age Appropriate Design Code)** to ensure children's privacy is protected in online services.

Children under 13 cannot provide their own consent for online services; parental consent is required.

9. Contact Details

Data Protection Officer (DPO):

Amy Royle – Data Protection Officer

Email: bursar@fulwoodcadley.lancs.sch.uk

Phone: 01772 717087

Post: Fulwood and Cadley Primary School, Cadley Causeway, Fulwood, Preston, PR2 3QT

10. Version Control

- **Version Number:** 6.0
 - **Date of Creation:** May 2018
 - **Last Review:** September 2025
 - **Next Scheduled Review:** September 2026
 - **Overview of Amendments:** Updated references from GDPR to **UK GDPR**, added international data transfer safeguards (IDTA, UK Addendum), incorporated ICO's Children's Code, updated review cycle.
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