



# **Barnett Wood Infant School**

## **Data Protection Policy**

**2025-26**

# Barnett Wood Infant School

## Policy Impact Statement and Updates

<b>Policy:</b>	Data Protection Policy
<b>Date of review:</b>	June 2025
<b>Governor/s responsible:</b>	James Sutcliffe / Paul Tylor
<b>Status / date of next review:</b>	Annual - June 2026
<b>How well has the policy achieved its purpose and outcomes?</b>	
<p>The primary purpose is to ensure the school complies with data protection laws, particularly the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). It provides clear guidelines for staff on how to handle personal data correctly and securely. The policy aims to protect the rights of individuals (students, staff, parents) regarding their personal data. It helps to mitigate risks associated with data breaches and misuse of personal information.</p> <p>The policy has ensured improved security measures for storing and processing personal data. Staff and governors have a better understanding of their responsibilities regarding data protection. The school community (including parents and students) are clear about how their data is collected, used, and stored and fosters a culture of compliance and data protection awareness throughout the school.</p>	
<b>Updates and/ or changes to policy:</b>	
June 2025	<b>Section 3:</b> Added section on Legislation and Guidance No other changes to policy
June 2024	<b>Information Security</b> 5.2 Management information system updated from SIMS to Arbor

*We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils and or staff with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.*

# Barnett Wood Infant School

## DATA PROTECTION POLICY

The Data Protection Officer at the school is – Colin Howard of Satswana DPO Services

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### 1. Introduction

1.1. The Data Protection Act May 2018 applies to all personal information about living individuals held either electronically or in a manual filing system.

1.2. Barnett Wood School holds and processes information about its current, past or prospective employees, applicants, students and others who are defined as data subjects under the Data Protection Act 1998. We process personal information for a variety of reasons such as administering the admissions process, Personnel recording payroll information, recording academic progress, monitoring attendance, and enabling references to be provided. Barnett Wood School may also be required by law to collect and use certain types of personal information to comply with the requirements of government departments to provide data.

1.3. Barnett Wood School takes the protection of all personal information extremely seriously and is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal information.

### 3. Legislation and Guidance

3.1 This policy meets the requirements of the:

- UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#)
- [Data Protection Act 2018 \(DPA 2018\)](#)

It is based on guidance published by the Information Commissioner's Office (ICO) on the [UK GDPR](#) and guidance from the Department for Education (DfE) on [Generative artificial intelligence in education](#).

### 2. Principles

2.1 All users of personal information within Barnett Wood School must comply with the eight Data Protection Principles. The Principles define how data can be legally processed. Processing includes obtaining, recording, holding or storing information and carrying out any operations on the data, including adaptation, alteration, use, disclosure, transfer, erasure and destruction. The eight Principles state that:

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or purposes
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is processed
4. Personal data shall be accurate and, where necessary, kept up to date

5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

### **3. Responsibilities**

3.1. The Headteacher is responsible for co-ordinating day to day data protection functions ensuring compliance with this policy and ensuring that the notification to the Information Commissioner is kept up to date.

This includes: development and implementation of the policy; notifying the Information Commissioner; responding to individual requests for access to personal information; and framing guidelines and procedures with the aim of ensuring that all personal information processed by Barnett Wood Infant School complies with the Data Protection Act May 2018.

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3.2. Senior Managers have a responsibility to ensure compliance with the Data Protection Act May 2018 and this policy, and to develop and encourage good information handling practices within their areas of responsibility. The senior managers are the Headteacher and Senior Teachers.

3.3. All staff have a responsibility to ensure they process personal information in accordance with the eight Data Protection Principles (see above) and other requirements of the Data Protection Act May 2018.

In particular, whenever a new form of processing data or an adaptation of an existing system is contemplated which would result in personal information being used for a different purpose than the one for which it was originally collected, those concerned must seek advice to ensure that the proposed processing complies with the requirements of the Data Protection Act May 2018.

### **4. Access to personal information**

4.1. The Data Protection Act 2018 gives data subjects the right to access any personal information held about them by Barnett Wood School.

4.2. Any person can exercise this right by making a Subject Access Request; such requests must be made in writing to the Headteacher. Any formal subject access request will be responded to within the 40 calendar days laid down by the Data Protection Act 2018.

4.3. Requests for information from pupils or parents for information that contains, wholly or partly, an educational record should be made in writing to the Headteacher and will be responded to within 15 school days.

4.4. The school will normally charge up to the prescribed maximum fee on a sliding scale (currently £10) for each subject access request.

## 5. Information Security

5.1 Personal information for which the School is responsible will be appropriately secured to protect against the consequences of breaches of confidentiality, failures in data integrity and to protect it against damage, loss or misuse.

### 5.2 Specifically

- All teacher laptops will be encrypted
- All school computers will have antivirus installed. (Sophos)
- All school laptops and office PCs will be password protected. (passwords to be changed termly)
- Passwords will be a minimum of 6 characters
- Paper records will be kept locked away when not in use.
- Only office staff will have access to the Arbor database
- The Arbor database is cloud based and is backed up daily to an offsite location.
- No personal information will be stored on:
  - USB storage devices – unless encrypted
  - Personal devices – phones, iPad, home computers
- All decommissioned devices will have data drives electronically scrubbed, ensuring all data is unreadable,
- No personal information will be published on the school website unless agreed with the owner of the information.
- Class cameras will be kept securely with the photo card deleted once photos have been uploaded.

### 5.3 Data Breaches

All Data breaches MUST be reported within 72 hours. At Barnett Wood we ask staff to report any data breach to the DPO as soon as they are aware of a breach or possible breach.

## 6. Photographs and videos

6.1 As part of our school activities, we may take photographs and record images of individuals within our school. We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and the pupil.

6.2 Any photographs and videos taken by parents/carers at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos with other pupils are not shared publicly on social media for safeguarding reasons, unless all the relevant parents/carers have agreed to this.

Where the school takes photographs and videos, uses may include:

- Within school on notice boards and in school newsletters, brochures, etc.
- Outside of school by external agencies such as the school photographer, newspapers, campaigns
- Online on our school website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

## 7. Artificial intelligence (AI)

Artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard. Barnett Wood recognises that AI has many uses to help pupils learn, but also poses risks to sensitive and personal data.

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, the school will treat this as a data breach, and will follow the personal data breach procedure.

## 8. Records management

8.1 All personal records will be kept securely in encrypted laptops, office PC's or in locked files in the office area or classrooms.

8.2 All personal information relating to records of children and adults who leave the school will be passed to the receiving school as appropriate. All sensitive information will be personally delivered to the receiving school with a request for proof of receipt.

## 9. Retention

The school will retain personal records as follows:

Subject	Retention period	Details
Pupils	From induction to transfer	We gather information about pupils applying to the school and all pupil information is passed to any receiving school on the child's departure.
Staff	From induction up to six years from leaving the school	After six years the staff file is shredded
Governors	From joining to leaving	Governing Body minutes are kept for 12 years.

## 10. Compliance

The School Business Manager at Barnett Wood School has notified the Information Commissioner's Office (ICO) that it processes personal data for a number of specified purposes. The schools registration as a data controller under the Data Protection Act 2018 can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk))

10.1. Any queries relating to the terms of the notification or other matters on the operation of the Data Protection Policy and Data Protection Act May 2018 should be raised with the headteacher who can be contacted at the school office or via email: [info@barnett-wood.surrey.sch.uk](mailto:info@barnett-wood.surrey.sch.uk)

10.2. Breaches of information security under the Data Protection Act May 2018 will be dealt with by a nominated governor in accordance with this and related policy and guidance. The nominated Governor from 24.06.2024 is James Sutcliffe.

## 11. Policy Review

11.1. This policy will be reviewed once every year or as necessary to ensure continued compliance with the Data Protection Act May 2018.

This policy has been drawn up within the context of data protection legislation and with other legislation or regulations, including equal opportunities, affecting the school.

**Barnett Wood's ICO Registration Number: Z9028673**