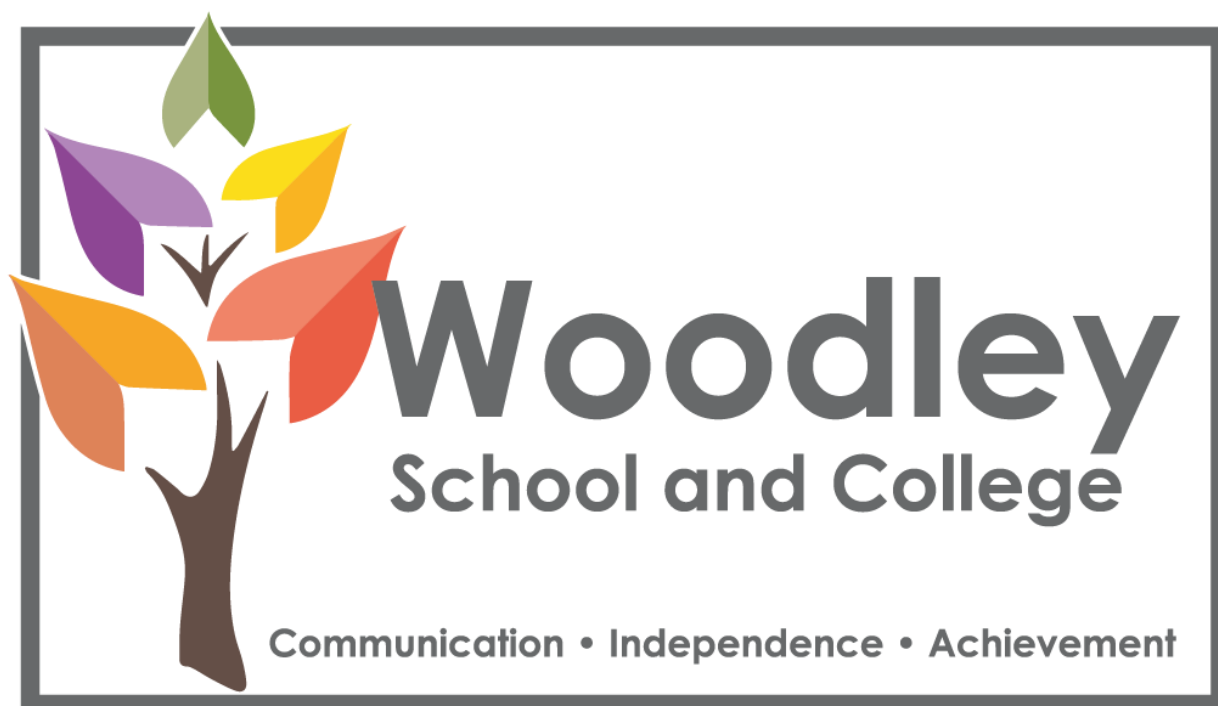


GDPR Policy



Policy Owner	Andrew Higginbotham
Policy Category	Statutory
Statutory website publication	Yes
Approved by	Governors
Date approved	January 2025
Next review	January 2027

1. Introduction

This Information Governance Policy outlines Woodley School & College's commitment to complying with all relevant data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope

This policy applies to all staff, volunteers, students, parents/carers, and any other individuals whose personal data is processed by Woodley School & College. It covers all types of personal data, including:

- **Staff data:** Names, addresses, contact details, employment history, salary information, performance reviews, etc.
- **Student data:** Names, addresses, contact details, date of birth, SEN assessments, medical records, educational records, attendance records, safeguarding information, etc.
- **Parent/Carer data:** Names, addresses, contact details, employment details (where relevant), medical information (where relevant), etc.
- **Volunteer data:** Names, addresses, contact details, criminal record checks (where applicable), etc.

3. Data Protection Principles

Woodley School & College will ensure that all personal data is processed lawfully, fairly, and transparently, in accordance with the following data protection principles:

- **Lawfulness, fairness, and transparency:** Processing must have a lawful, fair, and transparent basis.
- **Purpose limitation:** Data must be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data minimisation:** Only the data necessary for the specific purpose should be collected and processed.
- **Accuracy:** Data must be accurate and kept up to date.
- **Storage limitation:** Data should be retained only for as long as necessary for the purposes for which it was collected.
- **Integrity and confidentiality:** Data must be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage.
- **Accountability:** The school is responsible for and can demonstrate compliance with the data protection principles.

4. Data Processing Activities

Woodley School & College processes personal data for a variety of purposes, including:

- **Student education:** Providing education, managing attendance, assessing student progress, issuing reports, making referrals.
- **Staff employment:** Recruitment, payroll, HR management, performance reviews, training and development.
- **Safeguarding:** Identifying and responding to child protection concerns, conducting risk assessments, sharing information with relevant agencies.
- **Communication:** Communicating with students, parents/carers, staff, and other stakeholders.
- **Financial management:** Processing payments, managing school finances.
- **School administration:** Maintaining school records, managing admissions, organizing events.

5. Data Subject Rights

Individuals have the following rights in relation to their personal data:

- **Right of access:** The right to request access to their personal data.
- **Right to rectification:** The right to request the rectification of inaccurate or incomplete personal data.
- **Right to erasure ("right to be forgotten"):** The right to request the erasure of their personal data in certain circumstances.
- **Right to restriction of processing:** The right to request the restriction of processing of their personal data in certain circumstances.
- **Right to data portability:** The right to receive their personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- **Right to object:** The right to object to the processing of their personal data in certain circumstances.
- **Rights in relation to automated decision-making and profiling:** The right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning them or similarly significantly affects them.

6. Data Security

Woodley School & College will take appropriate technical and organizational measures to ensure the security of personal data, including:

- **Access control:** Implementing strong access controls to ensure that only authorized personnel can access personal data.
- **Data encryption:** Encrypting sensitive data both in transit and at rest.
- **Physical security:** Implementing physical security measures to protect data centers and other locations where personal data is stored.
- **Staff training:** Providing regular training to staff on data protection and security best practices.
- **Regular reviews:** Conducting regular security audits and risk assessments.

7. Data Breaches

In the event of a data breach, Woodley School & College will:

- **Identify and investigate the breach:** Promptly identify and investigate the cause of the breach.
- **Notify the ICO:** Notify the Information Commissioner's Office (ICO) of the breach within 72 hours, where required.
- **Notify affected individuals:** Notify affected individuals of the breach, where required.
- **Take steps to mitigate the impact of the breach:** Take steps to mitigate the impact of the breach, such as restoring data from backups.

8. Data Protection Officer (DPO)

Woodley School & College may designate a Data Protection Officer (DPO) to oversee data protection matters.

9. Data Sharing

Woodley School & College may share personal data with third parties, including:

- **Local Authority:** For educational purposes, safeguarding, and other statutory duties.
- **Education providers:** For the purposes of student education, such as colleges, universities, and training providers.
- **Healthcare providers:** For the purposes of student health and well-being.
- **External agencies:** For safeguarding purposes, such as the police and social services.

Information to be published. This includes datasets where applicable – please see “How to complete the Guide to Information”.	How the information can be obtained	Cost
Class 1 - Who we are and what we do (Organisational information, structures, locations and contacts) This will be current information only	(hard copy and/or website)	
Who's who in the school		
Who's who on the governing body / board of governors and the basis of their appointment		
Instrument of Government / Articles of Association		
Contact details for the Head teacher and for the governing body, via the school (named contacts where possible).		
School prospectus (if any)		
Annual Report (if any)		
Staffing structure		

School session times and term dates		
Address of school and contact details, including email address.		
Class 2 – What we spend and how we spend it (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit) Current and previous financial year as a minimum	(hard copy and/or website)	
Annual budget plan and financial statements		
Capital funding		
Financial audit reports		
Details of expenditure items over £2000 – published at least annually but at a more frequent quarterly or six-monthly interval where practical.		
Procurement and contracts the school has entered into, or information relating to / a link to information held by an organisation which has done so on its behalf (for example, a local authority or diocese).		
Pay policy		

Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members (Senior Leadership Team or equivalent, whose basic actual salary is at least £60,000 per annum) by reference to categories.		
Staffing, pay and grading structure. As a minimum the pay information should include salaries for senior staff (Senior Leadership Team or equivalent as above) in bands of £10,000; for more junior posts, by salary range.		
Governors' allowances that can be incurred or claimed, and a record of total payments made to individual governors.		
Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews) Current information as a minimum	(hard copy or website)	
School profile (if any) And in all cases: Performance data supplied to the English or Welsh Government or to the Northern Ireland Executive, or a direct link to the data		

• The latest Ofsted / Estyn / Education and Training Inspectorate report - Summary - Full report • Post-inspection action plan		
Performance management policy and procedures adopted by the governing body.		
Performance data or a direct link to it		
The school's future plans; for example, proposals for and any consultation on the future of the school, such as a change in status		
Safeguarding and child protection		
Class 4 – How we make decisions (Decision making processes and records of decisions) Current and previous three years as a minimum	(hard copy or website)	
Admissions policy/decisions (not individual admission decisions) – where applicable		

Agendas and minutes of meetings of the governing body and its committees. (NB this will exclude information that is properly regarded as private to the meetings).		
Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities) Current information only. As a minimum these must include policies, procedures and documents that the school is required to have by statute or by its funding agreement or equivalent, or by the Welsh or English government or the Northern Ireland Executive. These will include policies and procedures for handling information requests. In addition, for Wales, this will include a Welsh Language Scheme in accordance with the Welsh Language Act 1993. For Northern Ireland, this will include an equality scheme / statement in accordance with the Northern Ireland Act 1998.	(hard copy or website)	
Records management and personal data policies, including: • Information security policies • Records retention, destruction and archive policies • Data protection (including information sharing policies)		
Charging regimes and policies. This should include details of any statutory charging regimes. Charging policies should include charges made for information routinely published.		

They should clearly state what costs are to be recovered, the basis on which they are made and how they are calculated. If the school charges a fee for re-licensing the use of datasets, it should state in its guide how this is calculated (please see "How to complete the Guide to information").		
Class 6 – Lists and Registers Currently maintained lists and registers only (this does not include the attendance register).	(hard copy or website; some information may only be available by inspection)	
Curriculum circulars and statutory instruments		
Disclosure logs		
Asset register		
Any information the school is currently legally required to hold in publicly available registers		
Class 7 – The services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information only	(hard copy or website; some information may only be available by inspection)	
Extra-curricular activities		

Out of school clubs		
Services for which the school is entitled to recover a fee, together with those fees		
School publications, leaflets, books and newsletters		
Additional Information This will provide schools with the opportunity to publish information that is not itemised in the lists above		