



Dowdales School

General Data Protection Regulation

Issue No.	Author/Owner	Date of Issue	Reviewed	To be reviewed	Approved by Governors on
1	C Rushton	Nov 2013		Nov 2015	Nov 2013
2	C Rushton/ M Rushton	Nov 2013	Nov 2015	Nov 2017	June/July 2018
3	M Rushton	May 2018	June 2018	June 2021	
4	M Rushton	July 2021	July 2021	July 2022	
5	M Rushton	November 2022	November 2022	September 2023	November 2022
6	M Rushton	September 2024	September 2024	September 2025	September 2024
7	M Rushton	September 2025	September 2025	September 2026	15/09/2025

1. Rationale and legal framework

Dowdales School is committed to protecting the rights and privacy of pupils, parents/carers, staff and others, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

The policy also reflects the Data (Use and Access) Act 2025, the Privacy and Electronic Communications Regulations (PECR), and relevant Department for Education (DfE) guidance.

This policy applies to all personal data held by the school in any format (digital or paper), including photographs, video (CCTV and other surveillance systems), audio, biometrics, and data held in school-managed platforms and approved third-party systems.

2. Scope

This policy applies to governors, trustees, all staff (including temporary, supply and volunteers), pupils, contractors and service providers who process personal data on behalf of the school.

3. Roles and responsibilities

- **Governing board:** accountable for ensuring that the school complies with data protection law, adopts the necessary policies and receives regular assurance.
- **Headteacher and Senior Leadership Team:** responsible for resources, oversight and ensuring compliance in day-to-day operations, including data protection by design and by default.
- **All staff:** must complete mandatory training, follow this policy and associated procedures, and immediately report any personal data breach or near miss.
- **Data Protection Officer (DPO):** advises on obligations, monitors compliance, oversees DPIAs, and acts as the contact for the ICO and data subjects. The DPO performs tasks independently, with appropriate expertise and no conflict of interest. Contact details are published on the school website and in privacy notices.
- **IT/network security lead:** ensures systems and suppliers meet security standards; maintains filtering/monitoring, vulnerability management and backup/restore capability.

4. Data protection principles

We process personal data in accordance with Article 5 UK GDPR: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality (security); and accountability.

5. Lawful bases for processing

Our primary lawful bases are:

- **Legal obligation**
- **Public task** (exercising official authority/performing a task in the public interest, e.g. education and safeguarding).

Other bases may apply: contract, vital interests, consent (for optional activities), and legitimate interests (for limited non-statutory activities).

For special category data we rely on Article 9 UK GDPR, read with DPA 2018 Schedule 1 conditions including substantial public interest (e.g. safeguarding of children, equality of opportunity/monitoring), health/social care, and employment/social protection.

6. Consent (including children's consent)

Where we rely on consent, it will be freely-given, specific, informed and unambiguous, and can be withdrawn at any time.

For information society services offered directly to a child, only children aged **13 and over** may provide their own consent. Under 13s require consent from someone with parental responsibility.

7. Transparency and privacy information

We provide clear, concise privacy notices for pupils/parents and the workforce, explaining what we collect, why, lawful bases, who we share with, retention, rights and how to contact the DPO.

8. Records of processing and DPIAs

We maintain records of processing activities (ROPAs) and conduct Data Protection Impact Assessments (DPIAs) for high-risk processing, including surveillance systems, biometrics, new technologies, large-scale special category processing, profiling, or data matching. Where a DPIA identifies high residual risk that cannot be mitigated, we will consult the ICO before proceeding.

9. Individual rights

Individuals have rights to:

- be informed
- access
- rectification
- erasure
- restriction
- data portability
- objection
- not be subject to solely automated decision-making (including profiling).

Exemptions may apply (e.g. safeguarding, exam scripts/marks, management forecasting).

10. Subject Access Requests (SARs)

Requests can be made in any format.

We will verify identity where necessary and respond within one month. We may extend by two further months for complex requests, notifying the requester within one month.

We may ask the requester to clarify the scope and will pause ('stop the clock') while awaiting clarification. Searches will be reasonable and proportionate.

We do not charge a fee unless requests are manifestly unfounded or excessive.

For maintained schools, parental access to the educational record is provided within 15 school days under separate regulations.

Requests for CCTV or other surveillance footage will be handled carefully to protect third-party rights; where feasible, we will provide stills or footage with third-party images obscured.

11. Data sharing

We share personal data where it is lawful and necessary (e.g. with the DfE, LA, health partners, police and safeguarding partners). We maintain data sharing agreements or MOUs where appropriate and ensure decision-making minimises data shared.

We only use processors who provide sufficient guarantees. All contracts with processors meet Article 28 UK GDPR requirements.

12. International data transfers

We do not transfer personal data outside the UK unless appropriate safeguards are in place.

These may include UK adequacy regulations, the UK International Data Transfer Agreement (IDTA), or the UK Addendum to the EU Standard Contractual Clauses.

We assess transfer risks and put in place additional measures where required.

13. Security of personal data

We implement technical and organisational measures appropriate to the risk, including:

- access controls
- encryption
- multi-factor authentication
- secure configuration and patch management
- filtering/monitoring
- backup/restore capability
- supplier assurance.

Personal data must not be stored on unauthorised personal devices or removable media.

14. Personal data breaches

All staff must immediately report any suspected personal data breach or near miss.

We maintain a breach log, investigate incidents, learn lessons and, where required, notify the ICO without undue delay and within 72 hours.

Where a breach is likely to result in a high risk to individuals, we will inform affected individuals promptly.

15. Surveillance (CCTV and other systems)

We use surveillance proportionately to protect pupils, staff, visitors and property.

We conduct a DPIA before deployment or material change.

We ensure clear signage, restricted access, secure storage, short default retention (normally no more than 30–31 days unless required for investigation), and routine checks of system effectiveness.

Requests for copies are handled under SARs, balancing third-party privacy and safeguarding.

16. Photographs, audio/video and social media

Curriculum and operational uses of images are usually covered by public task.

We seek consent for optional uses (e.g. publicity/marketing).

We respect withdrawals of consent and provide reasonable alternatives where practicable.

17. Biometrics

If we use automated biometric recognition systems (e.g. canteen payments or controlled doors), we will:

- obtain written consent from at least one parent/carer
- respect any refusal or withdrawal by the pupil or parents
- provide reasonable alternative arrangements
- conduct a DPIA
- keep biometric templates securely
- delete templates when no longer needed.

18. Records management and retention

We adopt the IRMS Records Management Toolkit for Schools retention schedule and maintain a local schedule specifying retention periods and responsible owners.

We routinely dispose of data that is no longer required using secure methods and maintain destruction logs for high-risk records.

19. Training and awareness

All staff, governors and volunteers complete induction and regular refresher training proportionate to their roles. Additional training is provided to data handlers, DSLs, SENCOs and exam officers.

20. Monitoring and review

The governing board reviews this policy annually, or sooner following significant legal or organisational changes.

Appendix A – Pupil and Parent Privacy Notice (summary)

We collect pupil data to deliver education and safeguarding, meet statutory duties and manage school operations.

Lawful bases include public task and legal obligation; special category data under substantial public interest and health/social care.

Categories include: identifiers, characteristics, safeguarding, attainment, attendance, SEND, behaviour, images, CCTV and health.

We share with DfE, LA, health partners, exam boards and service providers where lawful.

Data is kept under the IRMS retention schedule.

You have rights including access, rectification and objection. Contact the DPO.

Appendix B – Workforce Privacy Notice (summary)

We process workforce data to manage employment, pay, pensions, safer recruitment, safeguarding, equality monitoring, training and operations.

Lawful bases: legal obligation, public task, contract.

Special category data under employment/social protection, health, and substantial public interest.

Categories include: identifiers, contracts, payroll, absence, training, performance, conduct, images, CCTV, health/occupational health.

We share with DfE, LA, payroll/pension providers, occupational health, DBS and processors as lawful.

Data kept under IRMS retention.

You have rights including access and rectification. Contact the DPO.

Appendix C – Subject Access Request (SAR) form (template)

You have the right to request access to your personal data. Requests can be in any form; identity may be verified. We will respond within 1 month.

Form fields:

- Requester name and contact details
- Data subject (if different)
- Relationship to data subject
- Scope of request (date range, systems, communications, specific keywords)
- Preferred format for response
- Identity evidence (if required)

Appendix D – DPIA screening questions (extract)

- Does the project involve new technology, surveillance, biometrics or large-scale processing of special category/criminal offence data?
- Will data be matched or combined from multiple sources?
- Are children or vulnerable people affected?
- Are international transfers envisaged (outside the UK)?

If yes, a full DPIA is required.



ACCESS TO PERSONAL DATA REQUEST
(Subject Access Request – SARS)
DATA PROTECTION ACT 1998 (Section 7)

Under the Data Protection Act an individual has the right to access personal information held about them. The form below is available to assist the school in providing you with the correct information.

Enquirer's Surname:	Enquirer's Forename:
Enquirer's Address:	
Enquirer's Postcode:	Enquirer's Tel No.
Are you the person who is the subject of the records you are enquiring about (i.e. the "Data Subject")?	YES/NO
If No:	
Do you have parental responsibility for a child who is the "Data Subject" of the records you are enquiring about?	YES/NO
If Yes:	
Name of child or children about whose personal data records you are enquiring:	<ul style="list-style-type: none"> • • •
Description of Concern/Area of Concern	
Description of Information or Topic(s) Requested (in your own words)	
Additional Information	

Please dispatch reply to: *(if different from enquirer's details as stated on this form)*

Name:

Address:

Postcode:

DATA SUBJECT DECLARATION

I request that the School search its records based on the information supplied above under Section 7 (1) of the Data Protection Act 1998 and provide a description of the personal data found from the information described in the details outlined above relating to me (or my child/children) being processed by the School.

I agree that the reply period will commence when I have supplied sufficient information to enable the School to perform the search.

I consent to the reply being disclosed and sent to me at my stated address (or to the Despatch Name and Address above who I have authorised to receive such information).

Signature of "Data Subject" (or Subject's Parent) _____

Name of "Data Subject" (or Subject's Parent)(PRINTED) _____

Dated _____

Please return completed forms to Mr. M Rushton at Dowdales School, telephone 469800, who is the point of contact regarding Subject Access Requests. The cost of a request can be found on our website under the FOI policy Part 2 www.dowdalesschool.co.uk. The maximum fee for dealing with a student record is £50 on a varying scale dependent on the number of pages. Other items are charged at a maximum fee of £10 on a varying scale.

Please provide a photographic form of identification and a recent utility bill on collection of paperwork unless the school has an ongoing relationship with the individual and identification is obvious. Verification of email address to which documentation is sent may also be required.

The response time for responding to a student's education record is 15 days. For other general SARs a response time of 40 days is allowed.

For Office Use

Date form received:

Identification checked:

Fee paid:

Date of response:

APPENDIX F



Dowdales School
Dalton in Furness

Privacy Notice

Below is a list of third party companies/organisations where limited student/staff data is passed to or accessed by when necessary. This is a fluid list.

Company	Data
ASDAN	Student details: Name, DOB, ethnicity, SEN Curriculum organisation details, photographs and evidence for moderation purposes.
Duke of Edinburgh Award Scheme	Student name, dob, contact details, address, medical info
World Challenge Expedition facilitator	Student name, dob, contact details, address, medical info plus personal fitness levels
NHS including School Nursing team	Student name, DOB, address, contact details, UPN, gender, ethnicity, SEN information, parental information, GP details.
Social Services	Student name, DOB, address, contact details, UPN, sibling/parental information
Other educational establishments	Student name, address, DOB, contact details, UPN, educational records, exam results, gender, SEN area of need and information, exam access arrangements.
Alternative Provision Providers	Student name, DOB, address, contact numbers, UPN, SEN information.
Virtual learning environments (NISAI)	Student name, DOB, address, contact details and UPN.
Work Experience providers	Student name, DOB, address, contact details, where necessary medical and pastoral information.
Travel companies ie Voyager Travel	Student name, DOB, Passport numbers (where necessary), dietary and medical information.
Exchange school - International Schools	Student name, email addresses.
MFL Department: Memrise Learning Platform	User name and email address
Performing Arts Dept: RSC/ProExcel/Ludas/ Rambert/Arts Council/ EMI/Arts Award	Student name, dob, candidate number,

Company	Data
IT Dept:	Student name and gender
• Online competition Bebras	
Mathematics Dept:	Student names, class code and year group
• My Maths	
PE Department:	Student name and DOB for Year 10 students
• Sports Leaders UK	
Educational Visits Dept:	Student names, medical information, emergency contact details, UPN, Form groups
• Evolve (Visit approval)	
Microlibrarian	Student name, Form, DOB, information regarding loans and book preferences.
Examination Boards:	Student name, DOB, ULN, UCI, gender, admission number, exam entries and results and SEN area of need.
• WJEC/AQA/EDEXCEL/OCR	
Paxton Door Access System	Student name, year and form group, student biometric or pin as applicable
NRS Trustee Cashless Catering	Student name, year and form group, admission number, UPN, DOB, dietary requirements, FSM data, biometric or pin as applicable. Account transactions.
FMS – Capita	For invoicing purposes, parent name and address and student name
ParentPay	Student admission number, name, DOB, gender, registration and form group, address, dietary requirements, FSM data. Parent name, address, contact details.
SISRA – Online assessment tool	Student name, subjects taken, class codes, gender, ethnicity, SEN, FSM, Looked After, PP, EAL, MA, Registration group, attendance and assessment information.
SIMS – School Management	Student names, contact details, attainment data, photographs, attendance information, timetables, family links, medical details, pastoral info, exam info, DOB, UPN, dietary needs, nationality, country of birth, first language, passport details, consent history, previous school, ethnicity, gender, specific groups eg. FSM,
Kym Allan Consultants (Accident Reporting)	Student name, address, DOB, accident details.
RS Connect Ed (Communication system)	Student name, contact details, parental name and contact details.
Barnardo's/Furness Carers	Student name, DOB, parental contact details, (Counselling/Support Group)SEN information.

Company	Data
Tempest Photography	Student name and form group
Supply/agency staff	Student name and class group.
Microsoft- emails and Teams	Student name, email address/user name, class lists, student year of entry
Teleconnexions – CCTV	Images of students, student name
ITPS – IT Support company	Student name and work on servers. Student usernames, year of entry.
Internet provider	Student internet access – student username
Capita – Access to SIMs database through Redstor online back up	See SIMS above.

Requesting access to your personal data

Under data protection legislation, parents and students have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact Mr. M Rushton, at the school tel: 01229 469800.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

Contact

If you would like to discuss anything in this privacy notice, please contact: Mr M Rushton, Dowdales School, tel: 01229 469800.