

BOLD FUTURES



Bold Futures Federation Data Protection Policy

Written: September 2025
Next Review Planned: September 2027

Signed: _____ (Policy Owner)

Print Name: _____

Review Date: _____

Signed: _____ (Governor Approval)

Print Name: _____

Approval Date: _____

Bold Futures Federation

POLICY CHANGE HISTORY

[illegible]

Data Protection Policy

The school collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about staff, pupils, parents, governors and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller of the personal data that it collects and receives for these purposes and the individual that the data relates to is known as the Data Subject. Any third party, such as an external supplier (e.g. Premier Sports) who may receive personal data in order to conduct their business or role within the school is known as the Data Processor.

Each school has a Data Protection Officer, Laura Harman-Box (Talavera Junior School) and Victoria Hotham (Wellington Community School and Marlborough Infant School), who may be contacted via email or phone, details are available on the school websites.

The school issues Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents and staff and copies of our current Privacy Notice can be found on the school website. These summarise the personal data held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data.

Purpose

This policy sets out how the school deals with personal data correctly and securely and in accordance with the GDPR, and other related legislation.

This policy applies to all personal data however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

What is personal data?

Personal data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

1. Personal data shall be processed lawfully, fairly and in a transparent manner. In order for personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the GDPR. These include (amongst other relevant conditions) where

processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the school. Where the special categories of personal data are processed, this shall include (amongst other relevant conditions) where processing is necessary for reasons of substantial public interest. When processing and special category data in the course of school business, the school will ensure that these requirements are met where relevant.

2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes). The school will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.

3. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.

4. Personal data shall be accurate and, where necessary, kept up to date; personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the school of any changes in circumstances to enable records to be updated accordingly. The school will be responsible for ensuring that updating or records takes place where appropriate.

5. Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The school will not keep personal data for longer than is necessary for the purpose or purposes for which they were collected and will take reasonable steps to destroy or erase from its systems all data which is no longer required.

6. Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

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 data protection.

Data Controllers have a General Duty of accountability for personal data.

Commitment

The Federation is committed to maintaining the principles and duties in the GDPR at all times. The school will:

Inform individuals of the identity and contact details of the data controller

Inform individuals of the contact details of the Data Protection Officer

Inform individuals of the purposes that personal information is being collected for and the basis for this (sometimes the reason may be because there is a legal or statutory requirement)

Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this

If the school plans to transfer personal data outside the EEA, the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information

Inform individuals of their data subject rights (these can be found in the privacy notice)

Inform individuals that the individual may withdraw consent (where relevant) and that, if consent is withdrawn, that the school will cease processing their data, although that will not affect the legality of data processed up until that point

Provide details of the length of time an individual's data will be kept (details can be found in the Privacy Notice)

Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected, the school shall inform the individual and where necessary seek consent

Check the accuracy of the information it holds and review it at regular intervals

Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in

Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded

Ensure that personal information is not retained longer than it is needed and in line with the data retention policy

Ensure that when information is destroyed that it is done so appropriately and securely

Share personal information with others only when it is legally appropriate to do so

Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests)

Ensure that personal information is not transferred outside the EEA without the appropriate safeguards

Ensure that all staff and governors are aware of and understand these policies and procedures

Retention and Disposal of Personal Data

Each school will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as appropriate.

Each school maintains a Retention Schedule that is specific and relevant to the specific types of information retained. The schedule outlines the appropriate periods for retention in each case.

Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk.

Review

This policy will be reviewed as it is deemed appropriate but no less frequently than every 2 years. The policy review will be undertaken by the Data Protection Officer, Executive Head teacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact the Executive Headteacher who will also act as the contact point for any subject access requests.

Headteacher or Data Protection Officer
Talavera Junior School
Gun Hill
Aldershot
GU11 1RG