

The Darent Federation of Schools

GDPR Policy (General Data Protection Regulation)



Approved by:	Executive Headteacher	Date: March 2026
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GDPR Protection Policy

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1. Aims

The Darent Federation is committed to protecting the personal data of pupils, parents/carers, staff, governors, volunteers, visitors and contractors. We recognise our legal and moral responsibility to handle personal information properly, securely and transparently.

This policy explains how we comply with data protection legislation and ensure that personal data is:

- Processed lawfully, fairly and transparently
- Used only for specified, explicit and legitimate purposes
- Accurate, relevant and not excessive
- Stored securely and retained only as long as necessary

This policy applies to all personal data held by the Federation, whether in paper or electronic form.

2. Legislation and guidance

This policy is based on and complies with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The ICO Children's Code (Age Appropriate Design Code)
- ICO guidance for schools and education providers
- Regulation 5 of the Education (Pupil Information) (England) Regulations 2005

The Federation also takes account of Department for Education (DfE) guidance on data protection, safeguarding and the use of digital technologies in schools.

3. Definitions

Personal data: Any information relating to an identified or identifiable living individual.

Special category data: Personal data requiring additional protection, including health, SEND, ethnicity, religion, biometric and safeguarding information.

Processing: Any operation performed on personal data, including collection, storage, use, sharing or deletion.

Data subject: The individual whose personal data is processed.

Data controller: The organisation that determines how and why personal data is processed.

Data processor: An organisation that processes personal data on behalf of the controller.

Personal data breach: A security incident resulting in accidental or unlawful loss, disclosure, alteration or access to personal data.

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4. The data controller

The Darent Federation of Schools is the data controller for all personal data processed within the Federation.

Each school is registered with the Information Commissioner's Office (ICO) as required by law.

5. Roles and responsibilities

5.1 Governing Body

The Governing Body has overall responsibility for ensuring compliance with data protection legislation.

5.2 Data Protection Officer (DPO)

The DPO is responsible for:

- Advising on compliance with data protection law
- Monitoring data protection practices
- Advising on Data Protection Impact Assessments (DPIAs)
- Acting as the point of contact with the ICO and data subjects

DPO: Tom Hardwick

Contact: office@sundridge.kent.sch.uk

The Federation also uses a fractional DPO service provided by Satswana Limited.

5.3 Executive Headteacher

The Executive Headteacher acts on behalf of the data controller in the day-to-day management of data protection.

5.4 All staff

All staff are responsible for:

- Handling personal data in line with this policy
- Maintaining confidentiality
- Reporting data breaches immediately
- Seeking advice when unsure about lawful data use

Failure to comply may result in disciplinary action.

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6. Data protection principles

The Federation complies with the UK GDPR principles, ensuring personal data is:

1. Lawful, fair and transparent
2. Collected for specified purposes
3. Adequate, relevant and limited
4. Accurate and up to date
5. Kept no longer than necessary
6. Processed securely

7. Lawful basis for processing

As a public authority, the Federation primarily processes personal data under the lawful bases of:

- **Public task** – to perform our statutory education functions
- **Legal obligation** – to meet legal and regulatory requirements

Consent is used only where no other lawful basis applies and is never relied upon for core educational or safeguarding functions.

Special category data

Special category data is processed under additional conditions, including substantial public interest, safeguarding, health or social care, or explicit consent where appropriate.

8. Data minimisation, accuracy and retention

The Federation:

- Collects only the data necessary for specific purposes
- Keeps data accurate and up to date
- Follows an approved Records Retention Schedule
- Securely deletes or anonymises data when no longer required

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9. Data sharing

Personal data may be shared where:

- Required by law
- Necessary for safeguarding
- Needed to support education provision

All third parties must provide appropriate data protection assurances, and data sharing agreements are used where required.

International data transfers are carried out only where appropriate safeguards are in place.

10. Individual rights and subject access requests

Individuals have rights under UK GDPR, including the right to:

- Access their personal data
- Request rectification or erasure
- Restrict or object to processing
- Data portability (where applicable)
- Complain to the ICO

Subject access requests must be responded to within one month.

Children's data

Children's rights are respected. Capacity is assessed on a case-by-case basis, and the best interests of the child are always prioritised.

11. Educational records

Parents and those with parental responsibility have the right to access their child's educational record within 15 school days, subject to legal exemptions.

12. Photographs and videos

The Federation uses photographs and videos for educational and promotional purposes only with appropriate consent.

Images are stored securely, used proportionately, and never accompanied by unnecessary personal data.

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13. Artificial Intelligence (AI)

The Federation recognises the growing use of AI tools in education.

Staff, pupils and governors must not enter personal or sensitive data into unauthorised AI systems.

Any misuse of AI involving personal data will be treated as a data breach. AI use must always be lawful, transparent, ethical and age-appropriate.

14. Data protection by design and default

The Federation embeds data protection into all processes by:

- Completing DPIAs where required
- Maintaining records of processing activities
- Training staff regularly
- Reviewing policies and systems routinely

15. Data security

Security measures include:

- Encrypted devices
- Strong password protocols
- Secure storage of paper records
- Clear desk policy
- Secure remote working expectations

16. Data breaches

All suspected data breaches must be reported immediately to the DPO.

Breaches are investigated, recorded and reported to the ICO within 72 hours where required.

17. Training

All staff and governors receive regular data protection training as part of induction and ongoing professional development.

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18. Monitoring and review

This policy is reviewed annually by the Executive Headteacher and Governing Body.

19. Related policies

- Child Protection Policy
- Child Welfare and Safety Policy
- Privacy Notices (Pupils, Parents, Staff)

Appendix 1: Personal Data Breach Procedure

The Federation follows ICO guidance for identifying, managing, reporting and learning from data breaches.

All breaches are documented and reviewed to prevent recurrence.