

Windsor Community Primary School



GDPR Policy

1. Introduction and Purpose

At Windsor Primary School, we are committed to protecting the privacy and security of your personal information. This policy explains how we collect, use, share, and keep safe the personal data we hold about our pupils, staff, parents/guardians, and visitors, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We want to be transparent about our data practices and ensure that everyone understands their rights.

2. Data Controller

Windsor Primary School, located at Upper Hill Street, Toxteth, Liverpool L8 8JE, is the data controller responsible for your personal data. Miss Fiona Pickering, the Headteacher, can be contacted for any data protection inquiries at the school address or via the school's main telephone number and email address (available on the school website).

3. Data Protection Principles

We will always process your personal data in accordance with the key principles of the UK GDPR:

- **Lawfulness, Fairness, and Transparency:** We will only collect and use your personal data in a way that is lawful, fair, and transparent. We will always be clear about what data we collect and how we will use it.
- **Purpose Limitation:** We will only collect your personal data for specific, clear purposes and will not use it in a way that is incompatible with those purposes.
- **Data Minimisation:** We will only collect the personal data that is necessary for the purposes for which we are using it.
- **Accuracy:** We will take reasonable steps to ensure that your personal data is accurate and kept up to date.
- **Storage Limitation:** We will only keep your personal data for as long as is necessary for the purposes for which it was collected.
- **Integrity and Confidentiality:** We will take appropriate security measures to protect your personal data against unauthorised access, loss, destruction, or damage.

4. Types of Personal Data Processed

We collect and process various types of personal data, including:

- **Pupil Data:** This includes information such as name, date of birth, address, contact details, academic records, attendance records, behaviour records, special educational needs information, health information, photographs.
- **Staff Data:** This includes information such as name, address, contact details, employment history, qualifications, payroll information, performance reviews, and absence records.
- **Parent/Guardian Data:** This includes information such as name, address, contact details, and relationship to the pupil.
- **Visitor Data:** This includes names and sometimes contact details of visitors to the school, as well as CCTV footage in certain areas for security purposes.

5. Lawful Basis for Processing

We will only process your personal data when we have a lawful basis for doing so. These bases include:

- **Consent:** Where we have obtained your explicit consent to process your data for a specific purpose (e.g., using photographs in school newsletters).
- **Legal Obligation:** Where we need to process your data to comply with a legal obligation (e.g., sharing safeguarding information with the local authority).
- **Public Task:** Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the school (e.g., providing education).
- **Legitimate Interests:** Where processing is necessary for our legitimate interests or the legitimate interests of a third party, provided that your rights and freedoms do not override those interests (e.g., sending you information about school events).
- **Vital Interests:** Where processing is necessary to protect someone's life (e.g., in a medical emergency).

For most processing related to the education of pupils, our primary lawful basis is often **public task** and **legal obligation**. We will rely on **consent** for more discretionary activities.

6. How We Collect Personal Data

We collect personal data in various ways, including:

- **Application Forms and Registration Processes:** When pupils join the school and when staff are employed.

- **Direct Communication:** Through emails, phone calls, letters, and face-to-face conversations.
- **Online Portals and Systems:** Such as parent portals, learning platforms, and assessment tools.
- **Surveys and Questionnaires:** To gather feedback and information.
- **CCTV Systems:** In designated areas for security and safeguarding purposes.
- **Photographs and Videos:** Taken during school events and activities (with consent where required).

7. How We Use Personal Data

We use personal data for a variety of purposes, including:

- **Providing Education:** Delivering the curriculum, assessing progress, and providing support.
- **Safeguarding and Welfare:** Ensuring the safety and well-being of pupils.
- **Communication:** Keeping parents/guardians informed about school activities, progress, and important information.
- **Administration:** Managing admissions, attendance, behaviour, and school resources.
- **Staff Management:** Managing employment, payroll, training, and performance.
- **Legal Compliance:** Fulfilling our legal obligations to various authorities.
- **Security:** Maintaining the security of our premises and preventing crime.

8. Who We Share Personal Data With

We may need to share personal data with certain third parties for specific purposes, including:

- **Local Authorities:** For statutory reporting, safeguarding, and educational support.
- **Health Professionals:** For pupil health and well-being (e.g., school nurses, doctors).
- **Educational Partners:** Such as other schools, colleges, and training providers (e.g., for transitions).
- **External Agencies:** Involved in safeguarding or child protection.
- **IT Support Providers:** Who may have access to our systems for maintenance.
- **Payment Processing Providers:** For school trips or other payments.

We will only share personal data with third parties who have agreed to handle it securely and in accordance with data protection law.

9. Data Security

We take the security of your personal data very seriously. We have implemented a range of technical and organisational measures to protect it from unauthorised access, loss, destruction, or damage. These measures include:

- Secure storage of paper-based and electronic records.
- Access controls to limit who can see your information.
- Regular data security training for staff.
- Firewalls and anti-virus software.
- Regular backups of our data.
- Secure disposal of data when it is no longer needed.

10. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including any legal, accounting, or reporting requirements. Our data retention schedule outlines the specific retention periods for different types of data. This schedule is available upon request.

11. Your Rights

Under the UK GDPR, you have several rights regarding your personal data:

- **The Right to Access:** You have the right to request a copy of the personal data we hold about you.
- **The Right to Rectification:** You have the right to ask us to correct any inaccurate or incomplete personal data we hold about you.
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- **The Right to Erasure ('Right to be Forgotten'):** In certain circumstances, you have the right to ask us to delete your personal data.
- **The Right to Restriction of Processing:** In certain circumstances, you have the right to ask us to restrict the processing of your personal data.
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- **The Right to Data Portability:** You have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
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- **The Right to Object:** You have the right to object to the processing of your personal data in certain circumstances, including for direct marketing purposes.
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- **Rights in relation to automated decision making and profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

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12. How to Exercise Your Rights

If you wish to exercise any of your data protection rights, please contact the Data Protection Officer, Peter Rafferty, at Windsor Primary School (Upper Hill Street, Toxteth, Liverpool L8 8JE). You can also reach him by telephone on 078249951498 or by email at peter@row7education.co.uk. We will respond to your request within one calendar month, although this period may be extended in complex cases. We may need to verify your identity before fulfilling your request.

13. Data Protection Officer (DPO)

Windsor Primary School has appointed Peter Rafferty as its Data Protection Officer. He is responsible for overseeing the school's data protection compliance and can be contacted using the details provided above.

14. Complaints

If you have a concern about how we have handled your personal data, please contact the Data Protection Officer, Peter Rafferty, in the first instance. We will do our best to address your concerns. If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

15. Review and Updates

This policy will be reviewed and updated regularly to ensure it remains accurate and compliant with the latest data protection legislation. The latest version of this policy will be available on the school website and upon request from the school office.