Tidbury Green School Dickens
Heath Road
Tidbury Green
Solihull
B90 1QW

Policy Name

Data Protection Policy

Date of Review

Spring Term 2026

Next Review Date

Spring Term 2028

Agreed by Governors

Spring Term 2026

Date

February 2026

Policy:	Data Protection Policy
People Authorised to make changes to this policy:	• Mrs R Fitter • Mrs E Smith
Committee responsible for approving policy:	Full Governing Body

Questions for the reviewer of this policy:	
Does this policy comply with statutory requirements and is relevant legislation and guidance referenced in the policy?	Yes
Does the policy reflect current evidence-based good practice?	Yes
Is the policy consistent with the vision and ethos of the school?	Yes
Does the policy reflect current practice in the school?	Yes

After policy review:	
Changes made:	Terminology updates: 1,2,3,5,6,7,8,9,10,15,16,17
Expected impact of updated policy:	The updated policy strengthens the School's compliance with UK data protection legislation and ICO guidance. It provides clearer guidance for staff and governors on their responsibilities, improves transparency for parents and pupils, and supports consistent, lawful, and secure handling of personal data. The policy also strengthens arrangements for safeguarding-related information sharing, data breach management, and staff training, ensuring greater confidence and accountability across the School.
Updated policy sent to governors:	Spring Term 2026
Updated policy sent to staff:	Spring Term 2026
Updated policy put on website:	Spring Term 2026

Data Protection Policy

(to be read in conjunction with Privacy Policy, Freedom Of Information Policy, Freedom Of Information Publication Scheme & E-Safety Policy, Photographic & Video Policy)

1. Purpose

Tidbury Green School aims to ensure that all personal data collected about, pupils, parents/carers, staff, governors, volunteers, visitors, and other individuals is collected, stored, and processed in accordance with UK data protection law.

This policy applies to all personal data, regardless of whether it is held in paper or electronic format and sets out how the school will meet its obligations under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

2. Legislation and Guidance

This policy is based on, and complies with, the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education (Pupil Information) (England) Regulations 2005
- Guidance from the Information Commissioner's Office (ICO)
- Keeping Children Safe in Education
- Local Authority guidance from Solihull Metropolitan Borough Council and Warwickshire Legal Services

3. Definitions

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

Special category data: Personal data which is more sensitive and requires additional protection, including information about health, ethnicity, religion, biometric data, and special educational needs.

Criminal offence data: Personal data relating to criminal convictions, allegations, or proceedings.

Processing: Any operation performed on personal data, including collecting, storing, sharing, using, or destroying it.

Data subject: The individual to whom the personal data relates.

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

Data processor: A third party that processes personal data on behalf of the data controller.

4. The Data Controller

Tidbury Green School processes personal data relating to pupils, parents/carers, staff, governors, volunteers, visitors and others, and is therefore the data controller.

The School is registered with the Information Commissioner's Office (ICO) and will renew its registration as required.

5. Roles and Responsibilities

5.1. **Governing Body**
The Governing Body has overall responsibility for ensuring that Tidbury Green School complies with all relevant data protection obligations.

5.2. **Data Protection Officer (DPO)**
The Data Protection Officer is responsible for:

- Providing advice and guidance on data protection law
- Monitoring compliance with data protection legislation
- Advising on data protection impact assessments
- Acting as the point of contact for data subjects and the ICO
- Reporting annually to the Governing Body on data protection matters

The school's DPO is provided via Warwickshire Legal Services and is contactable at:
Email: schooldpo@warwickshire.gov.uk

5.3. **Headteacher**
The Headteacher acts as the representative of the data controller on a day to day basis.

5.4. **Data Protection Lead**
Tidbury Green School has appointed a Data Protection Champion to act as the internal point of contact for data protection matters:
Emma Smith
Email: office@tidbury-green.solihull.sch.uk
Telephone: 01564 823189

5.5. **All Staff and Governors**
All Staff and governors are responsible for:

- Collecting, storing and processing personal data in accordance with this policy
- Ensuring personal data is kept secure
- Reporting any concerns, breaches, or suspected breaches immediately
- Seeking advice where unsure of the lawful basis for processing data

Failure to comply with this policy may result in disciplinary action.

6. Data Protection Principles

The School will comply with the UK GDPR principles. Personal Data shall be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept for no longer than necessary
- Processed securely to protect against unauthorised or unlawful processing, loss, destruction, or damage

7. Lawful Basis for Processing

Tidbury Green School will only process personal data where one or more lawful bases apply including:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest
- Performance of a contract
- Protection of vital interests
- Consent, where appropriate

Where special category or criminal offence data is processed, the School will identify both an Article 6 and Article 9 lawful basis and meet the conditions set out in Schedule 1 of the Data Protection Act 2018.

8. Data Protection by Design and Impact Assessments

The School will integrate data protection into all new processing activities. A Data Protection Impact Assessment (DPIA) will be carried out where processing is likely to result in a high risk to individuals' rights and freedoms, including:

- Use of new or emerging technologies
- Large-scale processing of sensitive data
- CCTV or other monitoring systems
- Data sharing outside the UK

9. Sharing Personal Data

Personal data will only be shared where lawful and necessary. This may include sharing information with:

- Local Authorities
- Other schools
- Health services
- Social care and safeguarding agencies
- Police and fraud prevention teams

All data sharing will be proportionate, secure and in line with legal requirements.

10. Individual Rights

Individuals have rights under data protection law, including the right to:

- Access their personal data
- Request rectification of inaccurate data
- Request erasure in certain circumstances
- Object to or restrict processing
- Lodge a complaint with the ICO

Requests should be made in writing to the Headteacher or Data Protection Lead. The School will respond with statutory timescales.

11. Safeguarding

Safeguarding children is a priority for Tidbury Green School. Personal data will be shared with relevant agencies where necessary to protect pupils, in line with statutory safeguarding duties.

The School uses secure systems, including My Concern, Arbor and InVentry, to support safeguarding, attendance and site security.

12. CCTV, Photographs and Videos

Where CCTV is used, it will be operated in accordance with ICO guidance and the School's CCTV arrangements.

Photographs and videos will be used in line with the School's Photographic and Video Policy. Consent will be obtained where required and may be withdrawn at any time.

13. Data Security and Storage

The School will ensure appropriate technical and organisational measures are in place to protect personal data, including:

- Secure storage of paper records
- Password protection and encryption of electronic data
- Controlled access to systems
- Secure transfer of information

14. Retention and Disposal

Personal data will be retained in line with the School's Records Management Policy and statutory guidance. When no longer required, data will be securely destroyed or anonymised.

15. Personal Data Breaches

All staff must report actual or suspected data breaches immediately to the Data Protection Lead.

Where required, breaches will be reported to the ICO within 72 hours and affected individuals will be informed where appropriate.

16. Training

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

17. Complaints

Concerns about how personal data is handled should be raised with the Headteacher in the first instance. If concerns are not resolved, individuals may complain to the information Commissioner's Office:

Information Commissioner's Office

Telephone: 03031231113

Website: www.ico.org.uk