



**Ribbleton Avenue**  
Methodist Junior School

***“Brighter futures built with Ambition, Courage and Respect; filled with Love, Hope and Faith”***

Data Protection Policy

## 1. Policy statement

Ribbleton Avenue Methodist Junior School is committed to protecting personal data and respecting the privacy of all individuals whose information we process. This includes pupils, parents/carers, staff, governors, volunteers, contractors and visitors.

We recognise our responsibilities under data protection legislation and are committed to processing personal data lawfully, fairly, transparently and securely.

This policy applies to **all personal data**, whether held electronically or in paper form.

---

## 2. Legal framework

This policy complies with the following legislation:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Human Rights Act 1998**
- **Freedom of Information Act 2000**
- **Education-related statutory duties**

Personal data is processed in line with guidance from the **Information Commissioner's Office (ICO)**.

---

## 3. Definitions

- **Personal data:** Information relating to an identifiable individual.
  - **Special category data:** Personal data revealing race, religion, health, biometric data, sexual orientation, etc.
  - **Data subject:** The individual the data relates to.
  - **Processing:** Any operation performed on personal data.
  - **Data controller:** Ribbleton Avenue Methodist Junior School.
- 

## 4. Roles and responsibilities

### ***Governing Body***

- Has overall responsibility for ensuring data protection compliance.
- Acts as the **Data Controller**.

### ***Headteacher***

- Responsible for day-to-day implementation of this policy.
- Ensures staff understand and comply with data protection requirements.

### **Data Protection Officer (DPO)**

- Monitors compliance with UK GDPR and related legislation.
- Provides advice on Data Protection Impact Assessments (DPIAs).
- Acts as the contact point for the ICO and data subjects.

### **All staff and volunteers**

- Must comply with this policy and complete data protection training.
- Are responsible for safeguarding personal data they handle.

---

## **5. Data protection principles**

Under UK GDPR, personal data must be:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and kept up to date
5. Kept no longer than necessary
6. Processed securely

The school is accountable for compliance with these principles.

---

## **6. Lawful bases for processing**

The school processes personal data under the following lawful bases:

- **Public task:** Processing necessary to perform our statutory functions
- **Legal obligation:** Processing required by law
- **Contract:** Processing relating to employment or service contracts
- **Vital interests:** To protect life
- **Consent:** Used only where appropriate and freely given

**Consent is not relied upon** where there is an imbalance of power, particularly in relation to pupils.

---

## **7. Special category data**

Special category data is processed only where an additional lawful condition applies, including:

- Safeguarding of children and individuals at risk
- Employment, health or social care obligations

- Substantial public interest
- Explicit consent, where appropriate

Access to such data is strictly controlled.

---

## 8. Children's personal data

Children's data is treated as **particularly sensitive**. The school ensures that:

- Processing is fair, necessary and transparent
- Privacy notices are clear and accessible
- Digital consent rules (age 13) are applied only where relevant to online services

Most school processing relies on **public task**, not consent.

---

## 9. Privacy notices

The school provides privacy notices for:

- Pupils
- Parents and carers
- Staff and governors
- Visitors

These explain:

- What data we collect
  - Why we collect it
  - How it is used and shared
  - Individuals' rights
- 

## 10. Data subject rights

Individuals have the right to:

- Be informed
- Access their data (Subject Access Requests)
- Rectification
- Erasure (where lawful)
- Restrict processing
- Data portability (where applicable)
- Object to processing
- Protection from solely automated decision-making

Requests are responded to **within one month** and managed in line with the school's Subject Access Request procedure.

---

## **11. Data Protection Impact Assessments (DPIAs)**

A **DPIA** is completed where processing is likely to result in a high risk to individuals' rights, including:

- CCTV
- New systems or technologies
- Large-scale data sharing

DPIAs are reviewed regularly and approved by the DPO.

---

## **12. Data sharing and third parties**

Personal data may be shared with:

- Local authorities
- Safeguarding partners
- Examination bodies
- The NHS
- Law enforcement agencies

Data sharing is:

- Proportionate
  - Secure
  - Documented through data sharing agreements where required
- 

## **13. International data transfers**

Where data is transferred outside the UK, the school ensures appropriate safeguards are in place, such as:

- Adequacy regulations
  - Standard contractual clauses
- 

## **14. Records management and retention**

Personal data is:

- Retained only as long as necessary

- Managed in line with the school's **Retention Schedule**
  - Securely disposed of when no longer required
- 

## 15. Data security

The school uses appropriate technical and organisational measures, including:

- Password protection and access controls
  - Secure storage and encryption
  - Staff training and confidentiality agreements
  - Clear desk and secure disposal procedures
- 

## 16. Data breaches

All data breaches, including near misses, must be reported immediately to the Headteacher and DPO.

Where required, breaches are reported to the **ICO within 72 hours** and to affected individuals without delay where there is high risk.

---

## 17. Training and awareness

All staff and governors:

- Receive data protection training
  - Are provided with guidance and updates
  - Understand their individual responsibilities
- 

## 18. Complaints

Concerns about data protection should be raised with the DPO.

Individuals also have the right to complain to the **Information Commissioner's Office**.

---

## 19. Review and monitoring

This policy is reviewed:

- **Annually**
- Following changes in legislation
- After significant incidents

The school will ensure that these rights will be exercised.

**Contact**

Contact the Data Protection Officer by:

Email: [mgaitens@ribbletonavenue-jun.lancs.sch.uk](mailto:mgaitens@ribbletonavenue-jun.lancs.sch.uk)

Phone: 01772 792083

Post: Ribbleton Avenue Methodist Junior School  
Emerson Road  
Ribbleton  
Preston  
PR1 5SN