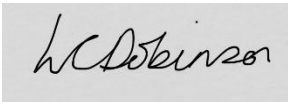




GDPR Compliance Statement Policy - Culgaith CE School

Approved by¹			
Name:	L. Dobinson		
Position:	Head teacher		
Signed:			
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1. Introduction

This policy outlines Culgaith CE School's commitment to compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). It applies to all personal data processed by the school, regardless of the format or medium. This policy aims to ensure that all personal data is handled lawfully, fairly, and transparently, respecting the rights and freedoms of individuals. This policy aligns with Keeping Children Safe in Education 2025 guidance.

2. Purpose

The purpose of this policy is to:

- Provide a framework for processing personal data in compliance with the UK GDPR.
- Protect the rights and freedoms of individuals regarding their personal data.



- Ensure transparency in how the school collects, uses, and stores personal data.
- Define roles and responsibilities for data protection within the school.
- Establish procedures for responding to data breaches and subject access requests.
- Maintain trust and confidence within the school community regarding data handling practices.

3. Scope

This policy applies to all staff (including teachers, teaching assistants, administrative staff, and volunteers), pupils, parents/carers, governors, and any third parties who process personal data on behalf of Culgaith CE School. It covers all personal data processed by the school, including but not limited to:

- Pupil records (academic, medical, and safeguarding information).
- Staff records (employment details, performance reviews, and training records).
- Parent/carer contact information.
- CCTV footage.
- Website data.
- Photographs and videos.

4. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person ('data subject').
- **Data Subject:** The individual to whom personal data relates.
- **Processing:** Any operation or set of operations performed on personal data, such as collection, recording, storage, use, disclosure, or deletion.
- **Data Controller:** The organisation that determines the purposes and means of processing personal data (Culgaith CE School).
- **Data Processor:** An organisation that processes personal data on behalf of the data controller.
- **Data Protection Officer (DPO):** The individual responsible for overseeing the school's data protection compliance.
- **Data Breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.
- **UK GDPR:** The UK General Data Protection Regulation.

5. Principles of Data Protection

Culgaith CE School adheres to the following principles of data protection:



- **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimisation:** Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- **Storage Limitation:** Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- **Accountability:** The data controller shall be responsible for, and be able to demonstrate compliance with, the principles.

6. Roles and Responsibilities

- **Governing Body:** The governing body has overall responsibility for ensuring that the school complies with the UK GDPR.
- **Headteacher (Mrs Dobinson):** The Headteacher is responsible for implementing this policy and ensuring that all staff are aware of their responsibilities.
- **Data Protection Officer (DPO):** Martyn Soulsby. The DPO is responsible for:
 - Monitoring compliance with the UK GDPR.
 - Providing advice and guidance on data protection matters.
 - Conducting data protection impact assessments (DPIAs).
 - Cooperating with the Information Commissioner's Office (ICO).
 - Serving as the point of contact for data subjects.
- **All Staff:** All staff are responsible for:
 - Processing personal data in accordance with this policy.
 - Protecting the confidentiality and security of personal data.
 - Reporting any data breaches or suspected breaches to the DPO.
 - Completing data protection training as required.

7. Data Processing Activities



Culgaith CE School processes personal data for various purposes, including:

- Admissions and enrollment.
- Teaching and learning.
- Assessment and reporting.
- Safeguarding and welfare.
- Communication with parents/carers.
- Staff administration.
- CCTV monitoring for security purposes.

For each data processing activity, the school will:

- Identify the lawful basis for processing (e.g., consent, legal obligation, legitimate interests).
- Inform data subjects about the processing activity (through privacy notices).
- Ensure that the data is accurate and up-to-date.
- Implement appropriate security measures to protect the data.
- Retain the data only for as long as necessary.

8. Data Security

Culgaith CE School is committed to ensuring the security of personal data. The school will implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage. These measures include:

- Access controls (e.g., passwords, user accounts, and multi-factor authentication).
- Encryption of sensitive data.
- Regular backups of data.
- Physical security measures (e.g., secure storage of paper records, CCTV monitoring).
- Staff training on data security best practices.
- Regular security audits and vulnerability assessments.
- A clear data breach response plan (see section 11).

9. Data Retention

Culgaith CE School will retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including any legal or regulatory requirements. The school has a data retention schedule that specifies the retention periods for different types of personal data. This schedule is available from the DPO.

10. Data Subject Rights



Data subjects have the following rights under the UK GDPR:

- **Right to be Informed:** The right to be informed about the collection and use of their personal data.
- **Right of Access:** The right to access their personal data and receive information about how it is being processed.
- **Right to Rectification:** The right to have inaccurate personal data corrected.
- **Right to Erasure ("Right to be Forgotten"):** The right to have their personal data erased in certain circumstances.
- **Right to Restriction of Processing:** The right to restrict the processing of their personal data in certain circumstances.
- **Right to Data Portability:** The right to receive their personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- **Right to Object:** The right to object to the processing of their personal data in certain circumstances.
- **Rights in relation to automated decision making and profiling:** The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects them.

Data subjects can exercise these rights by contacting the DPO. The school will respond to all requests within one month.

11. Data Breach Response

In the event of a data breach, Culgaith CE School will take the following steps:

1. **Containment:** Take immediate steps to contain the breach and prevent further data loss.
2. **Assessment:** Assess the nature and scope of the breach, including the type of data involved, the number of individuals affected, and the potential impact of the breach.
3. **Notification:** Notify the ICO within 72 hours of becoming aware of the breach, unless the breach is unlikely to result in a risk to the rights and freedoms of individuals.
4. **Communication:** Communicate with affected data subjects if the breach is likely to result in a high risk to their rights and freedoms.
5. **Remediation:** Take steps to remediate the breach and prevent future breaches, such as improving security measures and providing additional staff training.
6. **Documentation:** Document the breach, including the cause of the breach, the steps taken to contain and remediate the breach, and the notifications made to the ICO and data subjects.

12. Third-Party Data Processors



Where Culgaith CE School uses third-party data processors (e.g., cloud storage providers, software vendors), the school will:

- Conduct due diligence to ensure that the processor is capable of providing adequate data protection.
- Enter into a written contract with the processor that includes specific data protection obligations.
- Monitor the processor's compliance with the contract.

13. Policy Review

This policy will be reviewed annually, or more frequently if necessary, to ensure that it remains up-to-date and effective. The review will take into account any changes in legislation, guidance, or best practises.

14. Training

All staff will receive data protection training as part of their induction and ongoing professional development. The training will cover the principles of data protection, the requirements of the UK GDPR, and the school's data protection policies and procedures.

15. Monitoring and Enforcement

The DPO will monitor compliance with this policy and will report any breaches or concerns to the Headteacher and the Governing Body. The school will take disciplinary action against any staff member who violates this policy.

16. Contact Information

If you have any questions or concerns about this policy or the school's data protection practises, please contact the DPO at Martyn Soulsby martyn.schoolgovernor@culgaith.cumbria.sch.uk or 01768 88655

17. Related Policies and Procedures

This policy should be read in conjunction with the following related policies and procedures:

- Child Protection Policy
- Acceptable Use Policy
- CCTV Policy
- Data Retention Schedule



- Privacy Notices