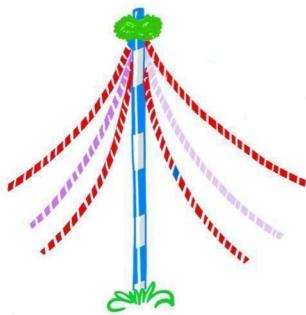


# Maypole School



## General Data Protection Regulations (GDPR) Policy

2025/26

Drafted by:	Terry Price	28 Sep 2025
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# General Data Protection Regulations (GDPR) Policy

## 1. Introduction

This policy outlines Maypole School's commitment to protecting the personal data of its pupils, staff, parents, governors, and visitors in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). This policy applies to all personal data held by the school, whether in electronic or paper format.

## 2. Policy objectives

- To process personal data transparently, lawfully, and fairly.
- To collect and process personal data only when strictly necessary for legitimate purposes.
- To ensure all data subjects are informed of their rights and how their data will be used.
- To maintain appropriate technical and organizational measures to ensure the security of personal data.
- To carry out Data Protection Impact Assessments, where necessary, to identify and minimise data protection risks.
- To handle data breaches effectively and report them where required.
- To provide regular data protection training to all staff.

## 3. Roles and responsibilities

- **Principal:** Ultimate responsibility for ensuring the school complies with the UK GDPR.
- **Executive Headteacher:** Oversees day-to-day data protection issues, ensuring all staff are aware of their obligations and reviewing any related queries.
- **Data Protection Officer (DPO):** The designated DPO is responsible for overseeing compliance, advising the school, and acting as the main point of contact for the Information Commissioner's Office (ICO). The DPO is Nic Smith (contact details below).
- **All Staff:** Must read, understand, and comply with this policy. Staff are

responsible for collecting and storing data in accordance with this policy and must report any data breaches to the DPO immediately.

#### **4. Data protection principles**

The school adheres to the six data protection principles when handling personal data:

- **Lawfulness, fairness, and transparency:** We process personal data legally and honestly, informing data subjects about our processing activities through privacy notices.
- **Purpose limitation:** We collect data only for specific, explicit, and legitimate purposes and do not process it in a way that is incompatible with those purposes.
- **Data minimisation:** We collect and process only the personal data that is adequate, relevant, and limited to what is necessary.
- **Accuracy:** We take every reasonable step to ensure personal data is accurate and, where necessary, kept up-to-date.
- **Storage limitation:** We do not keep data for longer than is necessary for the purposes for which it was collected. We follow the Information and Records Management Society (IRMS) retention guidelines for schools.
- **Integrity and confidentiality:** We ensure appropriate security of personal data, protecting it from unauthorized or unlawful processing, accidental loss, destruction, or damage.

#### **5. Lawful basis for processing**

Most personal data is processed under the legal bases of "public task" or "legal obligation". Consent is used for specific activities, such as publishing photographs on social media. Where we rely on consent, it must be freely given, specific, and unambiguous, with a clear option for withdrawal.

#### **6. Individual rights**

Data subjects have the following rights, which the school will uphold:

- **The right to be informed:** Provided through our privacy notices.
- **The right of access (Subject Access Request - SAR):** Individuals can request a copy of their personal data. SARs must be responded to within one calendar month of the date of receipt of the request, except for complex, or multiple requests, in which case the timeframe is extended by two additional months.
- **The right to rectification:** The right to have inaccurate personal data

corrected.

- **The right to erasure:** The right to have personal data deleted in certain circumstances, though this is limited for schools due to legal obligations.
- **The right to restrict processing:** The right to block or suppress the processing of personal data in certain circumstances.
- **The right to data portability.** The individual has the right to receive a copy of their personal information and use it for other purposes.
- **The right to object:** Including the right to object to direct marketing.

## 7. Data security and storage

- **Security measures:** The school implements technical and organizational measures to protect data. This includes restricted access to sensitive information, password protection, and data encryption.
- **Handling of data:** All staff must follow secure procedures for handling data, both electronically and in paper form. Portable devices containing personal data must be encrypted.
- **Data sharing:** Information will only be shared with third parties under a lawful basis and with a data processing agreement in place. Where the school contracts third parties, or subcontractors, who have access to the data, the school will carry out checks, to ensure that the data is stored and handled in accordance with the school's GDPR policy.
- **Records of Processing Activity (RoPA):** The school maintains records of all processing activities, including purposes, data categories, and retention periods.

## 8. Data breach management

- **Reporting:** All data breaches must be reported immediately to the DPO.
- **ICO notification:** The school will report any breach that poses a risk to individuals' rights and freedoms to the ICO within 72 hours.
- **Notification to individuals:** Individuals will be informed without undue delay if a breach is likely to result in a high risk to them.

## 9. Policy review

This policy will be reviewed annually by the Principal and Executive Leadership Team to ensure it remains compliant with all relevant legislation and reflects school

practices.

## **10. Contact information**

For any questions regarding this policy or data protection, please contact the school's Data Protection Officer (Nic Smith: 07511 869167/[nsmith@maypoleschool.co.uk](mailto:nsmith@maypoleschool.co.uk)).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

**The Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113  
Fax: 01625 524510