

Data Protection Policy

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Introduction

Ysgol Hamadryad collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable it to provide Education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the School complies with its statutory obligations.

Schools have a duty to inform individuals including parents and pupils of the information that it holds. This information should summarise why it is held and any other parties to whom this may be passed on to. Schools will advise individuals through Fair Processing in concise, transparent, plain language and free of charge.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the UK General Data Protection Regulation (GDPR), and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

What is Personal Information?

Personal information or data is defined as data that relates to a living individual who can be identified from that data, or other information held as defined within the UK GDPR.

UK General Data Protection Regulation (GDPR) Principles:

The UK GDPR establishes six enforceable principles that must be adhered to at all times in that information must be:

1. Processed fairly, lawfully and in a transparent manner
2. Collected for specified explicit and legitimate purposes and not further processed in a manner that is incompatible for those purposes.

3. Adequate relevant and limited to what is necessary in relation to the purpose for which it is processed
4. Accurate and where necessary kept up to date
5. Kept in a form that permits identification of data subjects for no longer than necessary for purposes that which the personal data is processed
6. Processed in a manner that ensures appropriate security of the personal data

General Statement

The School is committed to maintaining the above principles at all times. Therefore, the school will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so Appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Right of Access, right of rectification, right to erasure, right to restrict processing, right to data portability and right to object
- Ensure our staff are aware of and understand our policies and procedures
- Ensure our staff are provided with adequate training and support

Rights of access to information

There are two distinct rights of access to information held by Schools about pupils:

1. Under the UK GDPR any individual has the right to make a request to access the personal information held about them.

2. The right of those entitled to have access to curricular and educational records as defined within the Education Pupil Information (Wales) Regulations 2004.

Individual Rights

The UK GDPR provides the following rights for individuals:

1. **The right to be informed**

The school will provide concise, transparent, intelligible and easily accessible information about the processing of personal data to individuals via the Privacy Notice. This will be written in clear plain language and will clearly set out how personal data is processed within the school

2. **The right of access**

The school will provide individuals with access to their personal data and supplementary information; this will be processed as a subject access request. Subject Access Requests will be free of charge and processed in line with the statutory requirements and timeframes.

3. **The right to rectification**

The school is committed to rectifying personal data if inaccurate or incomplete and notifying any relevant third parties of this.

The school will respond to a request for rectification within one month of receiving the request, if the request for rectification is deemed complex this will be responded to within two months.

If the school cannot take action in response to a request for rectification we will provide a written explanation of this, an individual will then have a right to complain to the schools data protection officer.

4. **The right to erasure**

The school will consider individual requests for deletion or removal of personal data where there is no compelling reason for its continued processing.

Schools will inform relevant third parties of erasure of personal data; unless it is impossible, r involves disproportionate effort to do so.

5. **The right to restrict processing**

The school will ensure that data processing is restricted in any of the following circumstances:

- Where an individual's contests the accuracy of personal data until the accuracy is verified
- Where an individual has objected to the processing
- When processing is unlawful
- If the school no longer requires to keep the personal data but the indivusal requires the data in relation to a legal claim

If data processing is restricted, the school will notify any relevant third parties.

6. **The right to data portability**

The school will comply with individual requests to data portability free of charge and within one month of receiving the request.

7. The right to object

The school will comply with individuals right to object and will stop processing personal data unless there are compelling legitimate grounds for processing or the processing is in relation to a legal claim.

The school will inform individuals of their right to object at the point of first communication in the schools Privacy Notice.

8. Rights in relation to automated decision making and profiling

The school will not use automated decision making nor profile any individuals.

The school clearly sets out within its Privacy Notice what information we collect/use and why this is relevant.

Subject Access Requests

The school will process all subject access requests and provide a copy of the information free of charge and within one month of receipt.

The school will charge a fee when a request is manifestly unfounded or excessive, particularly if it is repetitive,

Further copies of the information can be provided at a reasonable charge,

If requests are complex or numerous the school has the right to extend the period of compliance by a further two months. The school will notify individuals if this occurs.

If a request is manifestly unfounded or excessive the school has the right to refuse this request, the school will notify the individual and explain why they cannot comply with the request and inform them of their right to complain to the schools data protection officer.

The school will verify the identity of the individual making the request using reasonable means.

Complaints

Complaints in relation to processing of personal data should be addressed to the schools data protection officer.

Review

This policy will be reviewed on an annual basis. The policy review will be undertaken by the Headteacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Mrs Ceri Morgan on 02920 471173 who will also act as the contact point for any requests for personal data.

Further advice and information is available from the Information Commissioner's Office:

www.ico.org.uk

The Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: **0303 123 1113** – Helpline is open from 9am to 5pm, Monday to Friday

Email: casework@ico.org.uk

Signed (Chair of Governors) *H.Williams (17.11.2025)*

Date 17.11.2025

Signed (Headteacher) C.Morgan

Date 17.11.2025