



DAVENIES

Data Protection Policy

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1. Aims

Beaconsfield Educational Trust Ltd operating as Davenies School ("the School") aims to ensure that all personal data collected about staff, pupils, parents, governors, contractors, volunteers, visitors and other individuals is collected, stored and processed in accordance with current data protection legislation. This Policy applies to all personal data, regardless of whether it is in paper or electronic format.

This Policy applies to the whole School, including the EYFS.

2. Legislation and Guidance

This Policy meets the requirements of the GDPR and the expected provisions of the Data Protection Bill. It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#) and the ICO's [code of practice for subject access requests](#).

It also reflects the ICO's [code of practice](#) for the use of surveillance cameras and personal information.

3. Definitions

Term	Definition
Personal Data	Any information relating to an identified, or identifiable, individual. For example: ▪ Name (including initials) ▪ Home address, contact details ▪ Pupil records ▪ Photos and videos Personal data may exist as an electronic record and as a hard copy (paper or otherwise)
Special Categories of Personal Data	Personal data which is more sensitive and so needs more protection. For example: ▪ Religious beliefs ▪ Medical history ▪ Special Educational Needs
Processing	Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying and sharing. Processing can be automated or manual.
Data Subject	The identified or identifiable individual whose personal data is held or processed
Data Controller	A person or organisation that determines the purposes and the means of processing of personal data
Data Processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller

Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data
Third Party	Any external organisation with whom personal data is shared

4. The Data Controller

The School processes personal data relating to parents, pupils, staff, governors, contractors, volunteers, visitors and others, and therefore is a Data Controller. The Bursar has responsibility as the Primary Data Controller on behalf of the School. The Bursar is supported in this role by an external Data Processing Officer who is a subject matter expert.

5. Roles and Responsibilities

This Policy applies to **all staff** employed by the School, and to external organisations or individuals working on our behalf. Staff who do not comply with this Policy may face disciplinary action.

5.1 Governing Board

The Governing Board has overall responsibility for ensuring that the School complies with all relevant data protection obligations.

5.2 Primary Data Controller

The Primary Data Controller is responsible for overseeing the implementation of this Policy, monitoring compliance with data protection law, and developing related policies and guidelines where applicable. The Bursar fulfils this responsibility on a day-to-day basis.

5.3 Data Protection Team

The Data Protection Team is made up of a Data Protection Officer (DPO), the Headteacher and the Bursar. The team is responsible for overseeing the implementation of this policy, monitoring the school's compliance with data protection law, and developing related policies and guidelines where applicable.

The DPT will provide an annual report of their activities directly to the Governing Body and, where relevant, will report any advice and recommendations on school data protection issues.

The DPT is also the first point of contact for individuals whose data the school processes, and for the ICO.

The Data Protection Team can be contacted at: bursar@davenies.co.uk

The DPO is David Powell who can be contacted at: dpo@sapphireskies.co.uk

5.4 All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the School of any changes to their personal data, such as a change of address

- Contacting the primary Data Controller in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - If they have any concerns that this policy is not being followed
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 - If they wish to share personal data with third parties
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals

6. Data Protection Principles

The School seeks to address (amongst other things) the following key regulatory principles within this Policy:

- **Lawfulness, fairness and transparency** in the handling and use of personal data. The School will ensure that we make it clear how we are using personal data, on which “lawful bases” we are processing the information and that we recognise and uphold the rights of the Data Subjects.
- **Limiting the processing of personal data to specified, explicit, and legitimate purposes.** The School shall not use personal data for purposes that are “incompatible” with the purpose for which the data was originally collected.
- **Minimising the collection and storage of personal data** so that we only collect and retain what we need to for the intended purpose of processing.
- **Ensuring the accuracy** of personal data and enabling it to be erased or rectified without delay.
- **Limiting the storage of personal data.** The School will ensure that we retain personal data only as long as necessary to achieve the purposes for which it was collected.
- **Ensuring security, integrity, and confidentiality of personal data.** The School employs appropriate technical and organisational security measures to keep personal data secure.

7. Collecting Personal Data

7.1 Processing

The School processes information to fulfil contractual obligations to provide educational services, safeguard and promote the welfare of its pupils, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with.

The School may process different types of information about staff, pupils, parents, governors, contractors, volunteers, visitors and other individuals for the purposes set out above. That information may include (but is not limited to):

- Personal details such as home address, contact details, date of birth and next of kin
- Identification documents
- Pupils' performance at School, including assessments, reports, examination reports, discipline record, attendance information
- Special educational needs
- Medical records and information, including details of any illnesses, allergies or other medical conditions suffered by a child
- Safeguarding information
- Details of any support received, including learning support, therapists, counselling, care plans and support providers
- Sensitive personal data such as ethnic group, religious beliefs
- Images of pupils and staff (and occasionally other individuals) engaging in School activities
- Bank details and National Insurance Number
- Performance Development Records
- CCTV images for security purposes

7.2 Lawfulness, Fairness and Transparency

The School will only process personal data where one of 6 'lawful bases' (legal reasons) to do so under data protection law is present:

- The data needs to be processed so that the School can **fulfil a contract** with the individual, or to enter into a contract
- The data needs to be processed so that the School can **comply with a legal obligation**
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone's life
- The data needs to be processed for the **legitimate interests** of the School or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/guardian when appropriate in the case of a pupil) has freely given clear **consent**

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Bill.

Whenever we initially collect personal data directly from individuals, we will provide them with the relevant information required by data protection law in the form of a Privacy Notice.

Personal data (including sensitive personal data, where appropriate) is processed by the School in order to:

- administer admissions
- support pupils' teaching and learning
- monitor and report on pupil progress
- provide appropriate pastoral care and safeguarding
- communicate with individuals with links to the School
- where appropriate, promote the School to prospective pupils (including through the School's prospectus, website and social media applications)
- other reasonable purposes relating to the operation of the School including to obtain appropriate professional advice and insurance for the School
- Process payroll
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning

7.3 Limitation, Minimisation and Accuracy

We will only collect personal data for specified, explicit and legitimate reasons. If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so.

Staff must only process personal data where it is necessary to do their jobs. When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the School's *Data Protection Policy – Data Retention Policy*.

8. Sharing Personal Data

During daily activities the School will frequently engage with third party organisations and may need to share personal data with them. A list of the third parties, with whom the School regularly shares data is available within Annex 1. The individuals concerned will be informed when the School shares personal data with third parties not on this list. The School will seek to ensure any third party upholds the principles of Data Protection as laid out in this document.

Personal data may be shared with a third party where:

- There is an issue with a pupil or parent/guardian that puts the safety of a pupil or our staff at risk
- We need to liaise with other agencies
 - to enable the relevant authorities to monitor the School's performance i.e. Independent

Schools Inspectorate;

- to compile statistical information (normally used on an anonymous basis);
 - to safeguard pupils' welfare and provide appropriate pastoral (and where relevant, medical) care for pupils;
 - where specifically requested by pupils and/or their parents or guardians;
 - to enable pupils to take part in national and other assessments and to monitor pupils' progress and educational needs;
 - where necessary in connection with learning and extra-curricular activities undertaken by pupils e.g. educational visits, peripatetic teachers, residential trip providers, extra-curricular providers;
 - in connection with operating the school minibuss service;
 - to obtain appropriate professional advice;
 - where a reference or other information about a pupil or ex-pupil is requested by another educational establishment or employer to whom they have applied
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT support, catering
 - The use by the School of online academic and educational services
 - The use by the School of cloud IT services such as email and file storage for staff and pupils

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

We will only transfer personal data to a country or territory outside the European Economic Area if we are satisfied the third party(s) involved will only process the data in accordance with data protection law.

9. Subject Access Requests and Other Rights of Individuals

9.1 Subject Access Requests

Individuals have a right to make a 'Subject Access Request' to gain access to personal information that the School holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned

- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

Subject Access Requests must be submitted in writing, either by letter, email or fax to the Bursar. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

If staff receive a Subject Access Request they must immediately forward it to the Bursar.

9.2 Children and Subject Access Requests

Personal data about a child belongs to that child, and not the child's parents or guardians. For a parent or guardian to make a Subject Access Request with respect to their child, the child must either be unable to understand their rights and the implications of a Subject Access Request or have given their consent.

Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a Subject Access Request. Therefore, most Subject Access Requests from parents or guardians of pupils at the School may be granted without the express permission of the pupil. Children aged 12 and above may be mature enough to understand their rights and the implications of a Subject Access Request and therefore, a Subject Access Request from parents or guardians may require additional permission from the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupils' welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns, confidentially, with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

9.3 Responding to Subject Access Requests

When responding to requests, we:

- Will take appropriate steps to confirm the identity of the person making the request

- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary and that they may seek redress with the Information Commissioner's Office if they feel this extension is not warranted

We will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive or asks for further copies of the same information.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

9.4 Other Data Protection Rights of the Individual

In addition to the right to make a Subject Access Request (see above), and to receive information when we are collecting their data about how we use and process it (see section 7), individuals also have the right to:

- To request rectification of any data that is inaccurate or incomplete
- To have their personal data erased and to prevent further processing if:
 - It is no longer required for the purposes for which it was collected
 - Consent is withdrawn
 - There is an opposition to the processing and no superseding legitimate interest
- The personal data is being unlawfully processed
- The personal data must be removed in order to comply with a legal obligation
- Request a restriction of further processing of personal data
- Object to processing on specific grounds

Individuals should submit any request to exercise these rights to the Bursar. If staff receive such a request, they must immediately forward it to the Bursar.

10. CCTV

We use CCTV at entry points to the School site to ensure it remains safe. We will adhere to the ICO's [code of practice](#) for the use of CCTV.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use. Where it is necessary to access data on the CCTV system, an entry is to be made in the Data Controller's Log.

Any enquiries about the CCTV system should be directed to the Bursar.

11. Photographs and Videos

As part of the School activities, we may take photographs and record images of individuals within the School.

We will obtain written consent from parents/guardians for photographs and videos to be taken of their child and from staff for communication, marketing and promotional materials on an annual basis.

Uses may include:

- Within School on notice boards and in School magazines, brochures, newsletters, etc.
- Outside of School by external agencies such as the School photographer, prospectus, newspapers, campaigns
- Online on the School website, intranet or social media pages including Facebook, Twitter, Instagram, Flickr.

Consent will be sought for each specific use and can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video from all locations and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified, unless specific consent is provided.

See our *Policy on Taking, Storing and Using Images of Children* for more information on our use of photographs and videos.

12. Data Protection by Design and Default

We will put measures in place to show that we have integrated data protection into all our data processing activities, including:

- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6)
- Completing Data Protection Impact Assessments where the School's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies
- Integrating data protection guidance and policy into internal documents including this policy, any related policies and privacy notices
- Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep records of attendance
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
- Maintaining records of our processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of the School and all information we are required to share about how we use and process their personal data (via our privacy notices)
 - For all personal data that we hold, maintaining an internal record of the type of data, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure

13. Data Security and Storage of Records

The UK GDPR General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, has a rationale to protect the rights and freedoms of individuals. Organisations including schools and colleges, are required to take security measures to mitigate the risks of destruction that is unauthorised, disclosure that is unauthorised, access that is unauthorised and any alteration that is unauthorised. The school will ensure staff are aware of risks and how to minimise them. The school will therefore have in place procedures to minimise the risk of attacks. **Please see Data Security Policy**

The DfE has produced 'Cyber security standards for schools and colleges'. The school will follow these standards where possible.

Summary:

- Protect all devices on every network with a properly configured boundary or software firewall
- Network devices should be known and recorded with their security features enabled, correctly configured and kept up-to-date
- Accounts staff only have the access they require to perform their role and should be authenticated to access data and services
- Protect accounts with access to personal or sensitive operational data and functions by multi-factor authentication
- Use of anti-malware software to protect all devices in the network, including cloud-based networks
- Ensure the security of all applications downloaded onto a network
- Licence all online devices and software for use and patch with the latest security updates
- Maintain 3 backup copies of important data, on at least 2 separate devices, at least 1 must be off-site
- Ensure the business continuity and disaster recovery plan includes a regularly tested contingency plan in response to a cyber attack

- Report serious cyber attacks
- Conduct a Data Protection Impact Assessment by statute for personal data held as required by General Data Protection Regulation
- Implement AI safely where necessary
- Train all staff with access to school IT networks in the basics of cyber security

The governing board will be responsible for:

- Ensuring the school has appropriate cyber-security measures in place.
- Ensuring the school meets where possible, DfE standards for cyber security
- Ensuring cyber security protocols are in place that are suitable for the setting.
- Ensuring there is a data breach procedure in place.
- Understanding the data that is available to governors
- Understanding that personal emails cannot be used regarding confidential matters
- The safe and necessary implementation, use and oversight of AI
- Understanding that personal or confidential data cannot be taken off site unless there is authority and or authorisation to do so.

The headteacher/bursar will be responsible for:

- Ensuring all staff, students, and governors and any other relevant parties are aware of their cyber security responsibilities.
- Ensuring a cyber recovery plan is in place
- Ensuring access protocols are followed.
- Arranging staff training and update training – Cyber Awareness Plan
- Ensuring that alerts and monitoring relating to cyber security are acted upon
- Ensuring a response to inappropriate online material
- The safe and necessary implantation use and oversight of AI
- Ensuring online safety within the setting, including training and policy

The DPO will be responsible for:

- The management of data security.
- Assessing the risks to the school in the event of a cyber-security breach.
- Responding to data breaches and liaising with relevant agencies, IT providers and notifying relevant organisations and data subjects.
- Arranging staff training and update training – Cyber Awareness Plan
- Monitoring and reviewing the effectiveness of this policy, alongside the headteacher, and communicating any changes to staff members.
- Strategies that mitigate risk whilst managing a data breach and strategies that mitigate risk
- The improvement of cyber security after a data breach with relevant agencies, IT provider, DPO and ICO recommendations.
- The safe and necessary implantation use and oversight of AI
- Monitoring this policy

The ICT provider will be responsible for:

- Maintaining records and or an inventory on Software and hardware
- Ensuring data is logged for a long enough period to help investigate, determine the source, identity, vulnerabilities and causation factors of a cyber attack.
- Ensuring effective monitored firewalls are in place

- Ensuring appropriate user privileges are in place as agreed with SLT
- Removing former staff, students, and other relevant parties from School systems;
- Updating software and removing out of date software
- Ensuring appropriate data security software is installed on devices that are not owned by the school and used for school purposes.
- Ensuring regular backups are undertaken including offline where possible.
- Ensuring updated malware protection
- Enabling multi-factor authentication where possible
- Maintaining an up to date password and username inventory.
- Ensuring effective filtering is in place
- Informing the SLT of any inappropriate content or other alerts
- The safe and necessary implantation use and oversight of AI

The DSL will be responsible for:

- Safeguarding within cyber security
- Filtering and Monitoring
- The safe and necessary implantation use and oversight of AI

All staff members will be responsible for:

- Understanding their responsibilities
- Completing training and update training
- The safe and necessary implantation use and oversight of AI

14. Disposal of Records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it. For example, we will shred paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the School's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

15. Personal Data Breaches

The School will make all reasonable endeavours to minimise the risk of personal data breaches. In the unlikely event of a suspected data breach, we will follow the procedure set out in Annex 2. When appropriate, we will report the data breach to the ICO within 72 hours.

16. Training

All staff and governors are provided with data protection training as part of their induction process. Data protection will also form part of continuing professional development, where changes to legislation, guidance or the School's processes make it necessary.

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18 Filtering and Monitoring

The School uses appropriate filtering and monitoring systems to safeguard pupils and staff when accessing the internet and using digital technologies. These systems are designed to prevent access to harmful or inappropriate content and to alert the School to potential safeguarding concerns.

Personal data may be processed as part of these systems. This can include information such as device identifiers, login details, websites visited, search terms, and usage patterns. The School processes this data under its legal obligations to safeguard pupils and to maintain a safe educational environment.

Filtering and monitoring data is:

- ***Used solely for safeguarding, security, and network-management purposes***
- ***Accessed only by authorised staff***
- ***Retained for no longer than necessary***
- ***Handled in accordance with the School's wider Data Protection Policy and UK GDPR requirements***

The School regularly reviews the effectiveness of its filtering and monitoring arrangements and ensures they meet current statutory guidance, including Keeping Children Safe in Education.

Pupils, parents, and staff are informed about the existence and purpose of these systems through the School's acceptable use policies and safeguarding communications.

19 Cyber Awareness, Training and Acceptable Use

Cyber Awareness and Information Security

The School maintains appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or disclosure. These measures include secure systems, controlled access, encryption where appropriate, and regular monitoring of cyber-security risks. All staff are expected to follow the School's information-security procedures and to report any concerns, suspected breaches, or unusual system activity immediately to the Data Protection Lead.

Training and Staff Responsibilities

All staff receive regular data-protection and cyber-awareness training appropriate to their role. Training covers safe handling of personal data, secure use of digital systems, recognising phishing and other cyber

threats, and the School's procedures for reporting data-protection incidents. Staff must complete refresher training as required and are responsible for applying the principles of this policy in their daily work.

Acceptable Use of Technology

Staff, pupils, governors, and volunteers must use the School's IT systems, devices, and online platforms in accordance with the School's Acceptable Use Policy (AUP). The AUP sets out expectations for secure behaviour, password management, appropriate communication, and responsible use of school-owned and personal devices. Breaches of the AUP may result in disciplinary action and may also constitute a data-protection incident.

Related Policies

This policy should be read alongside the School's:

- Acceptable Use Policy
- Online Safety Policy
- Safeguarding and Child Protection Policy
- Information Security Procedures
- Data Breach Response Plan

20 Cyber Risk Assessment

Cyber Risk Assessment

Cyber risk assessment is carried out regularly to identify, evaluate, and mitigate threats to the school's information systems and the personal data we hold. Assessments consider technical vulnerabilities, human factors, and emerging risks, ensuring that appropriate safeguards are in place and updated as needed. Findings inform our security controls, staff training, and incident-response planning, helping maintain a safe and resilient digital environment for pupils, staff, and the wider school community.

Incident Response

Any suspected or actual data breach — whether digital or physical — is reported immediately to the Data Protection Officer. The school follows a clear incident-response process to contain the issue, assess the impact, notify affected individuals where appropriate, and implement measures to prevent recurrence.

21 Artificial Intelligence AI

The School recognises that Artificial Intelligence (AI) technologies are increasingly used in education to support teaching, learning, and administrative functions. This section sets out how the School ensures that any use of AI complies with data protection legislation, including the UK GDPR and the Data Protection Act 2018, and aligns with the School's safeguarding responsibilities.

Principles for AI Use

The School will only use AI systems in ways that are:

- Lawful, fair, and transparent – Individuals will be informed when their personal data may be processed by an AI system.
- Purpose-limited – AI will only be used for clearly defined educational or operational purposes.

- **Data-minimising – Only the minimum personal data necessary will be used.**
- **Secure – AI tools must meet the School’s technical and organisational security standards.**
- **Human-supervised – AI will not be used for automated decision-making that produces legal or significant effects on pupils or staff without meaningful human involvement.**

Appropriate use of AI in school

- Work should be labelled when using AI.
- Pupils work should not be used to train AI tools.
- Pupils work should not be entered into AI tools without the consent of the owner and the school.
- Any data entered into AI should not be personal data that is confidential and or sensitive in nature.
- Any data entered into AI by staff and governors/trustees is the responsibility of staff and governors/trustees in relation to content, confidentiality, security, safeguarding and training AI tools.

AI Misuse

- Staff will consider the potential pupil misuse of use of AI tools when assessing pupil’s work.
- School devices used for assessments and exams should not have access to AI tools or should have them disabled for the duration.
- Staff should investigate the inappropriate use of AI tools and report the use to the SLT.
- Pupils should declare AI use within their work
- Pupils may be subject to school sanctions regarding the inappropriate use of AI including online safety and the submission of work.

Implementation of AI

Staff must:

- **Follow this policy and the School’s Acceptable Use Policy**
- **Seek guidance from the Data Protection Officer before using new AI tools**
- **Report any concerns about AI use, data breaches or inappropriate processing immediately**

Pupil Data and Safeguarding

AI use must never compromise pupil welfare. Any AI system used by the School must:

- **Support, not replace, personal judgement;**
- **Avoid processing data in ways that could expose pupils to risk.**
- **Be monitored for potential bias or harmful outputs.**

22 Whistleblowing for Employees

There are existing procedures in place to enable staff to lodge a grievance relating to employment, seek access to information, or complain regarding the way in which the school is handling staff’s personal data. Whistleblowing covers major concerns that fall outside the scope of other procedures. These include but are not limited to:

- concerns over practices observed by staff that adversely impacts on the security of personal data held by the school
- concerns over unauthorised disclosure or use of personal data held by the school

- concerns over actions leading to the corruption or loss of integrity of any of the personal data held by the school
- other unethical conduct which staff believe is a breach of the schools obligations as a Data Controller

Thus, any serious concerns that staff have about any aspect of the school's handling of personal data or of others acting on behalf of the school in their handling of personal data can be reported to line managers and or DPO and or ICO.

The school has detailed procedures in place for whistleblowing with regards to safeguarding and financial management. These procedures would be followed in relation to whistleblowing relating to data protection.

This process does not replace the schools complaints procedure.

23. Monitoring Arrangements

This Policy will be reviewed annually or as required in line with any legal updates. Governors will incorporate GDPR compliance within their regular compliance reviews and visits to the School.

24. Links with other Policies

This Data Protection Policy is linked to the following other School Policies:

- Admissions Policy
- Anti-Bullying Policy
- Pastoral Care Policy
- Contingency Action Plan
- Data Protection – Good Practice Guide, *including* Retention of Records
- Equality Policy
- First Aid Policy
- Health & Safety Policy
- IT Handbook
- Recruitment Policy & Procedure
- Registers Policy
- Safeguarding Policy, *including* Policy on Taking, Storing and Using Images of Children
- Security Policy, *including* CCTV
- SEN Policy
- Staff Induction Policy

Annex 1: Third Party Data Processors

The following is a list of third-party companies and organisations with whom the School frequently shares personal data:

2Simple - Purplemash	ISEB
ABRSM	ISI
AccessIt	LAMDA
Apple	Lighthouse
Appurity	Mailchimp
Atlantic Data Ltd	Marsh
Atom Learning	Maths Circle
Aviva	Microsoft
Bucks County Council	Minibus Hire Companies
Charity Commission	MIT Labs
ClassDojo	MySchoolPortal
CMC	NatWest
Code Combat Inc.	Oxford University Press (myMaths)
Companies House	Nessy Reading and Spelling
CST Ltd	Payroll Management Ltd (EPay)
EdenRed	PressBurst
EduCare	Redwood Collections
EduKey	Renaissance Learning
Ellipse	Royal London
Facebook	SchoolCloud
Flickr	Step 2 Progress
Galore Park	Teachers' Pension
GL Assessment	TES School Portal
Gov.UK DfE	The Scout Association
Hayes MacIntyre	Thomas Franks Ltd
HMRC	Times Table Rockstars Co
HSE	Tooled Up Education
IDoceo	Transfer Schools (References)
iFinance	Vectare
Impact Digital	WCBS
Impero	Word Press
Instagram	Wufoo
Inventry	X (formerly Twitter)
iSAMS	Trip and Residential Organisers as necessary

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Annex 2: Personal Data Breach Procedure

This procedure is based on [guidance on personal data breaches](#) produced by the ICO.

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the Bursar
- The Bursar will investigate the report and determine whether a breach has occurred. To make a decision, the Bursar will consider whether personal data has been accidentally or unlawfully:
 - Lost
 - Stolen
 - Destroyed
 - Altered
 - Disclosed or made available where it should not have been
 - Made available to unauthorised people
- The Bursar will alert the Headmaster and the Chair of Governors
- The Bursar will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary. (Actions relevant to specific data types are set out at the end of this procedure)
- The Bursar will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The Bursar will advise the Headmaster and Chair of Governors as to whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. In order to make a decision, the Headmaster and Chair of Governors will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
 - Loss of control over their data
 - Discrimination
 - Identify theft or fraud
 - Financial loss
 - Damage to reputation
 - Loss of confidentiality
 - Any other significant economic or social disadvantage to the individual(s) concerned

If it is likely that there will be a risk to people's rights and freedoms, the Bursar must notify the ICO.

- The Bursar will document the decision (either way), in case it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored on the Data Controller Log held on SharePoint
- Where the ICO must be notified, the Bursar will do this via the ['report a breach' page of the ICO website](#) within 72 hours. As required, the Bursar will set out:
 - A description of the nature of the personal data breach including, where possible:
 - The categories and approximate number of individuals concerned
 - The categories and approximate number of personal data records concerned
 - The name and contact details of the Bursar
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned

- If all the above details are not yet known, the Bursar will report as much as they can within 72 hours. The report will explain that there is a delay, the reasons why, and when the Bursar expects to have further information. The Bursar will submit the remaining information as soon as possible
- The Bursar will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact. If the risk is high, the Bursar will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out:
 - The name and contact details of the Bursar
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
- The Bursar will notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
- The Bursar will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
 - Facts and cause
 - Effects
 - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)
 - Records of all breaches will be stored on the Data Controller Log held on SharePoint.
 - The Bursar and Headmaster will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible

Actions to Minimise the Impact of Data Breaches

We will take the all necessary and practicable actions to mitigate the impact of different types of data breach, focusing especially on breaches involving particularly risky or sensitive information. We will review the effectiveness of these actions and amend them as necessary after any data breach.