



HOLTON SLEAFORD

— INDEPENDENT SCHOOL —

GDPR Policy

Overview

This policy meets the requirements of the General Data Protection Regulation (GDPR) and the expected from the Data Protection Act (2018). 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.

The aim of this policy is to ensure that all personal data collected about associates of Holton Sleaford Independent School is collected, stored, and processed in accordance with the GDPR and the expected provisions of the Data Protection Act (2018).

Definitions

- Personal Data - any information relating to an individual. This may include:
 - Name (including initials)
 - Identification number
 - Location data
 - Online identifier, such as username
 - Factors specific to the individual's physical, physiological, genetic, mental, economic, cultural, or social identity.
- Special Categories of Personal Data - personal data which is more sensitive and so needs more protection, including information about an individual's:
 - Racial or ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade union membership
 - Genetics
 - Biometrics (such as fingerprints, retina, and iris patterns), where used for identification purposes
 - Health - physical or mental

- Sex life or sexual orientation
- Processing - anything done to personal data. Such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing, or destroying. This can be automated or manual.
- Data subject - the identified or identifiable individual whose personal data is held or processed.
- Data controller - a person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
- 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.

Data Controller

Holton Sleaford Independent School are a registered data controller with the ICO for the purposes of data protection law. This registration will be renewed annually or as otherwise legally required.

Roles and Responsibilities

This policy applies to all staff employed by and associates of Holton Sleaford Independent School. Individuals who do not comply with this policy may face disciplinary action.

Data Protection Officer

The DPO is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

The DPO is the first point of contact for individuals whose data is processed, and for the ICO.

Our DPO is Luke Hollingworth and is contactable via LH@holtonsch.uk

Responsibilities

All associates of Holton Sleaford Independent School 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 change of address.
- Contacting the DPO 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 they have a lawful basis to use personal data in a particular way.
 - 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.
 - If there has been a data breach.
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals.
 - If they need help with any contracts or sharing personal data with third parties.

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status, and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension, and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or a cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs

- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store, and use information about you that falls into 'special categories' of more sensitive personal data. This includes information about:

- Race, ethnicity, religious beliefs, sexual orientation, and political opinions
- Trade union memberships
- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment policy
- Allow better financial modelling and planning
- Enable equalities monitoring

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, there may be several grounds which justify the school's use of your data.

Collecting this information

While most of the information we collect from you is mandatory, there is some information that you can choose whether to provide us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

How we store this data

Personal data is stored in line with GDPR guidance and our Safeguarding and Child Protection Policy.

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

We will also keep it 5 years beyond their employment to comply with our legal obligations. The information contained is kept securely with limited authorised access permitted.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and complies with data protection law), we may share personal information about you with:

- Our local authority - to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- The Department for Education
- Your family or representatives
- Educators or examining bodies
- Our regulator (e.g. Ofsted)
- Suppliers and service providers - to enable them to provide the service we have contracted them for, such as payroll.
- Financial organisations
- Central and local government
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

Your rights

How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not for you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our DPO.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our DPO, Luke Hollingworth.

LH@holtonsch.uk

<u>Written by...</u>	<u>Mike Whatton</u>	<u>18/11/25</u>
<u>Approved by...</u>	<u>Luke Hollingworth</u>	<u>18/11/25</u>
<u>Signed...</u>		
<u>Date sent to Governors</u>		<u>Due for Review</u>
<u>Date approved by Governors</u>		<u>18/11/26</u>