

Data Protection and Information Governance Policy

Version	3.0
Effective	August 2026
Approved by	Governing Body
Review	August 2027 or sooner if required

Daffodil standard

Every Daffodil document is written to be understood, applied, evidenced and reviewed.

- Know the non-negotiable requirements, the responsible lead and the point for escalation.
- Put pupils' welfare, dignity, equality and access at the centre of each decision.
- Act promptly where safety or safeguarding may be at risk; do not wait for certainty.
- Make reasonable adjustments and listen to the pupil's voice in an accessible way.
- Keep factual, dated and secure records; review whether action made the intended difference.

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Policy summary

This operating table converts the policy into minimum actions and evidence. It supports implementation but does not replace the detailed modules.

Decision point	Minimum action	Required evidence	Review point
New processing	Identify purpose, lawful basis, minimisation, access, retention, transparency and processor safeguards before collection.	Processing record/DPIA and privacy information	Before launch and on change
Security incident	Contain without destroying evidence, notify the DPO, assess risk to people and meet regulatory/individual notification duties.	Breach log, risk assessment and decision record	Immediately, then 72-hour decision point where applicable
Access or disclosure	Verify identity and authority, disclose only what is necessary, use secure transfer and record exceptional decisions.	Access log and disclosure rationale	At disclosure and periodic audit
Retention expiry	Apply the schedule, preserve records under hold, authorise disposal and retain evidence of secure destruction.	Disposal log and hold record	Scheduled cycle and litigation/safeguarding trigger

Part 1 Data protection and accountability

Purpose and scope

This policy sets out Daffodil Preparatory School's arrangements for data protection and information governance. It applies to the proprietor/governing body, leaders, employees, agency staff, contractors, volunteers, pupils and visitors where relevant, including school-organised activities off-site and online conduct connected with the school.

Related policies: Safeguarding and Safer Working Policy; Parents Complaints Policy; Inclusion, Equality, SEND and Wellbeing Policy.

The school is an independent primary school in Tower Hamlets with an Islamic ethos. The welfare and best interests of children are central. Faith ethos is implemented consistently with safeguarding, equality, human rights, employment, health and safety and education law.

Policy commitments

- Act lawfully, promptly, proportionately and in the child's best interests.
- Listen to children and take account of age, development, communication, disability, SEND, EAL, culture and vulnerability.
- Keep clear, factual, secure records of decisions, actions, rationale and review.

- Escalate concerns and seek competent advice rather than allowing uncertainty to cause delay.
- Monitor implementation and learn from incidents, complaints, near misses, pupil voice and external guidance.

Responsibilities

- The proprietor/governing body retains strategic oversight, approves the policy, assures resources and receives evidence of effectiveness.
- The Headteacher implements the policy, assigns competent leads, ensures training and reports material risk or non-compliance.
- The DSL leads safeguarding aspects and is consulted whenever a child may be at risk of harm.
- The SENCO advises on SEND, disability, communication and reasonable adjustments.
- All staff follow procedures, maintain professional curiosity, record accurately and report concerns immediately.
- Pupils and parents are expected to follow school rules and are given accessible ways to ask questions, seek help and raise concerns.

Accountability

- Process personal data lawfully, fairly and transparently for specified purposes, using only what is necessary and keeping it accurate, secure and no longer than needed.
- Maintain records of processing, privacy notices, processor contracts, retention rules and evidence of staff training.
- Complete a DPIA before high-risk processing, including intrusive monitoring, biometrics and relevant AI systems.

Individual rights

- Route requests immediately to the Headteacher/DPO and verify identity proportionately.
- Meet statutory timescales for access, correction, erasure, restriction, objection and portability where applicable; record exemptions and decisions.

Children's data

- Apply enhanced transparency and fairness to children's data and do not use safeguarding data for incompatible purposes.
- Share information for safeguarding where necessary and proportionate; data protection law is not a barrier to protecting a child.

Equality, SEND and accessibility

The school applies the Equality Act 2010, anticipates reasonable adjustments and avoids blanket decisions. Staff distinguish deliberate misconduct from behaviour or difficulty arising from disability, SEND, communication need, trauma or medical condition. Information and processes are made accessible, and the pupil's voice is sought in a way they can understand.

Records, confidentiality and information sharing

Records are factual, dated, attributable, access-controlled and retained under the Data Protection and Information Governance Policy (retention section). Information is shared on a need-to-know basis when lawful and necessary. Safeguarding information is shared promptly to protect a child; data protection law is not used as a reason to withhold necessary safeguarding information.

Training, monitoring and assurance

- Induction and refresher training are proportionate to role and risk.
- The policy lead monitors incidents, timeliness, outcomes, equality impact, recurring themes and overdue actions.
- Material breaches are reported promptly to the Headteacher and governing body/proprietor and, where required, regulators or authorities.
- This policy is reviewed at least annually and sooner after significant incidents, legal change, updated statutory guidance or evidence that arrangements are ineffective.

Related school policies

- Part 2 — Personal-data breach response
- Part 3 — Retention, legal holds and disposal
- Part 4 — Information security and cyber resilience
- Part 5 — Website cookies and online services

Legal and guidance framework

- UK GDPR
- Data Protection Act 2018
- ICO education guidance
- KCSIE 2026
- Independent School Standards guidance (April 2026)
- Independent school inspection toolkit (August 2026)
- Equality Act 2010
- Children's Wellbeing and Schools Act 2026

Legal status note: KCSIE 2025 applies through 31 August 2026. This August review is written for implementation from 1 September 2026 and therefore adopts KCSIE 2026, the statutory mobile-phone guidance and the revised Relationships, Sex and Health Education guidance where relevant. Proposed SEND reforms are not treated as enacted duties unless commenced.

Part 2 Personal-data breach response

Policy at a glance

Purpose and scope

This policy sets out Daffodil Preparatory School's arrangements for responding to personal-data breaches. It applies to the proprietor/governing body, leaders, employees, agency staff, contractors, volunteers, pupils and visitors where relevant, including school-organised activities off-site and online conduct connected with the school.

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Policy commitments

- Act lawfully, promptly, proportionately and in the child's best interests.
- Listen to children and take account of age, development, communication, disability, SEND, EAL, culture and vulnerability.
- Keep clear, factual, secure records of decisions, actions, rationale and review.
- Escalate concerns and seek competent advice rather than allowing uncertainty to cause delay.
- Monitor implementation and learn from incidents, complaints, near misses, pupil voice and external guidance.

Responsibilities

- The proprietor/governing body retains strategic oversight, approves the policy, assures resources and receives evidence of effectiveness.
- The Headteacher implements the policy, assigns competent leads, ensures training and reports material risk or non-compliance.
- The DSL leads safeguarding aspects and is consulted whenever a child may be at risk of harm.
- The SENCO advises on SEND, disability, communication and reasonable adjustments.
- All staff follow procedures, maintain professional curiosity, record accurately and report concerns immediately.
- Pupils and parents are expected to follow school rules and are given accessible ways to ask questions, seek help and raise concerns.

Immediate response

- Report any suspected breach immediately to Miss S Ali, the Headteacher or DPO; do not conceal, delete evidence or contact affected people without instruction.
- Contain the incident proportionately, preserve logs and record what happened, affected data, people, systems and mitigation.

Assessment and notification

- The Headteacher and DPO assess risk to rights and freedoms and maintain the breach register.

- Notify the ICO without undue delay and, where feasible, within 72 hours when the legal threshold is met; document reasons for any non-notification or delay.
- Notify affected individuals without undue delay where high risk is likely, using clear protective advice.

Equality, SEND and accessibility

The school applies the Equality Act 2010, anticipates reasonable adjustments and avoids blanket decisions. Staff distinguish deliberate misconduct from behaviour or difficulty arising from disability, SEND, communication need, trauma or medical condition. Information and processes are made accessible, and the pupil's voice is sought in a way they can understand.

Records, confidentiality and information sharing

Records are factual, dated, attributable, access-controlled and retained under the Data Protection and Information Governance Policy (retention section). Information is shared on a need-to-know basis when lawful and necessary. Safeguarding information is shared promptly to protect a child; data protection law is not used as a reason to withhold necessary safeguarding information.

Training, monitoring and assurance

- Induction and refresher training are proportionate to role and risk.
- The policy lead monitors incidents, timeliness, outcomes, equality impact, recurring themes and overdue actions.
- Material breaches are reported promptly to the Headteacher and governing body/proprietor and, where required, regulators or authorities.
- This policy is reviewed at least annually and sooner after significant incidents, legal change, updated statutory guidance or evidence that arrangements are ineffective.

Related school policies

- Part 1 — Data protection and accountability
- Part 4 — Information security and cyber resilience
- Part 3 — Retention, legal holds and disposal

Legal and guidance framework

- UK GDPR
- Data Protection Act 2018
- ICO education guidance
- KCSIE 2026
- Independent School Standards guidance (April 2026)
- Independent school inspection toolkit (August 2026)
- Equality Act 2010
- Children's Wellbeing and Schools Act 2026

Legal status note: KCSIE 2025 applies through 31 August 2026. This August review is written for implementation from 1 September 2026 and therefore adopts KCSIE 2026, the statutory mobile-

phone guidance and the revised Relationships, Sex and Health Education guidance where relevant. Proposed SEND reforms are not treated as enacted duties unless commenced.

Part 3 Retention, legal holds and disposal

Policy at a glance

Purpose and scope

This policy sets out Daffodil Preparatory School's arrangements for data retention, legal holds and secure disposal. It applies to the proprietor/governing body, leaders, employees, agency staff, contractors, volunteers, pupils and visitors where relevant, including school-organised activities off-site and online conduct connected with the school.

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Policy commitments

- Act lawfully, promptly, proportionately and in the child's best interests.
- Listen to children and take account of age, development, communication, disability, SEND, EAL, culture and vulnerability.
- Keep clear, factual, secure records of decisions, actions, rationale and review.
- Escalate concerns and seek competent advice rather than allowing uncertainty to cause delay.
- Monitor implementation and learn from incidents, complaints, near misses, pupil voice and external guidance.

Responsibilities

- The proprietor/governing body retains strategic oversight, approves the policy, assures resources and receives evidence of effectiveness.
- The Headteacher implements the policy, assigns competent leads, ensures training and reports material risk or non-compliance.
- The DSL leads safeguarding aspects and is consulted whenever a child may be at risk of harm.
- The SENCO advises on SEND, disability, communication and reasonable adjustments.
- All staff follow procedures, maintain professional curiosity, record accurately and report concerns immediately.
- Pupils and parents are expected to follow school rules and are given accessible ways to ask questions, seek help and raise concerns.

Retention governance

- The retention schedule sets a documented minimum/maximum period, trigger, owner and disposal action for each record class.

- Legal holds, safeguarding need, litigation and statutory inquiry requirements override routine destruction.
- Review electronic and paper records at least annually; email is not a permanent record system.

Secure disposal

- Destroy paper confidentially and erase electronic media so information cannot reasonably be reconstructed.
- Keep a disposal log for material record series and require processors to confirm deletion or return.

Equality, SEND and accessibility

The school applies the Equality Act 2010, anticipates reasonable adjustments and avoids blanket decisions. Staff distinguish deliberate misconduct from behaviour or difficulty arising from disability, SEND, communication need, trauma or medical condition. Information and processes are made accessible, and the pupil's voice is sought in a way they can understand.

Records, confidentiality and information sharing

Records are factual, dated, attributable, access-controlled and retained under the Data Protection and Information Governance Policy (retention section). Information is shared on a need-to-know basis when lawful and necessary. Safeguarding information is shared promptly to protect a child; data protection law is not used as a reason to withhold necessary safeguarding information.

Training, monitoring and assurance

- Induction and refresher training are proportionate to role and risk.
- The policy lead monitors incidents, timeliness, outcomes, equality impact, recurring themes and overdue actions.
- Material breaches are reported promptly to the Headteacher and governing body/proprietor and, where required, regulators or authorities.
- This policy is reviewed at least annually and sooner after significant incidents, legal change, updated statutory guidance or evidence that arrangements are ineffective.

Related school policies

- Part 1 — Data protection and accountability
- Child Protection and Safeguarding and Safer Working Policy
- Part 4 — Information security and cyber resilience

Legal and guidance framework

- UK GDPR
- Data Protection Act 2018
- ICO education guidance
- KCSIE 2026
- Independent School Standards guidance (April 2026)
- Independent school inspection toolkit (August 2026)

- Equality Act 2010
- Children's Wellbeing and Schools Act 2026

Legal status note: KCSIE 2025 applies through 31 August 2026. This August review is written for implementation from 1 September 2026 and therefore adopts KCSIE 2026, the statutory mobile-phone guidance and the revised Relationships, Sex and Health Education guidance where relevant. Proposed SEND reforms are not treated as enacted duties unless commenced.

Part 4 Information security and cyber resilience

Policy at a glance

Purpose and scope

This policy sets out Daffodil Preparatory School's arrangements for information security and cyber resilience. It applies to the proprietor/governing body, leaders, employees, agency staff, contractors, volunteers, pupils and visitors where relevant, including school-organised activities off-site and online conduct connected with the school.

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Policy commitments

- Act lawfully, promptly, proportionately and in the child's best interests.
- Listen to children and take account of age, development, communication, disability, SEND, EAL, culture and vulnerability.
- Keep clear, factual, secure records of decisions, actions, rationale and review.
- Escalate concerns and seek competent advice rather than allowing uncertainty to cause delay.
- Monitor implementation and learn from incidents, complaints, near misses, pupil voice and external guidance.

Responsibilities

- The proprietor/governing body retains strategic oversight, approves the policy, assures resources and receives evidence of effectiveness.
- The Headteacher implements the policy, assigns competent leads, ensures training and reports material risk or non-compliance.
- The DSL leads safeguarding aspects and is consulted whenever a child may be at risk of harm.
- The SENCO advises on SEND, disability, communication and reasonable adjustments.
- All staff follow procedures, maintain professional curiosity, record accurately and report concerns immediately.
- Pupils and parents are expected to follow school rules and are given accessible ways to ask questions, seek help and raise concerns.

Security controls

- Apply least privilege, strong authentication, prompt account removal, secure configuration, patching, malware protection, encryption and tested backups.
- Separate administrative, staff, pupil and guest access and log significant security events.
- Require supplier due diligence, processor terms, breach notification and secure exit arrangements.

Human and incident controls

- Train staff to recognise phishing, social engineering, unsafe sharing and impersonation.
- Report suspected compromise immediately; isolate affected devices where safe and preserve evidence.
- Test recovery and incident response at least annually.

Equality, SEND and accessibility

The school applies the Equality Act 2010, anticipates reasonable adjustments and avoids blanket decisions. Staff distinguish deliberate misconduct from behaviour or difficulty arising from disability, SEND, communication need, trauma or medical condition. Information and processes are made accessible, and the pupil's voice is sought in a way they can understand.

Records, confidentiality and information sharing

Records are factual, dated, attributable, access-controlled and retained under the Data Protection and Information Governance Policy (retention section). Information is shared on a need-to-know basis when lawful and necessary. Safeguarding information is shared promptly to protect a child; data protection law is not used as a reason to withhold necessary safeguarding information.

Training, monitoring and assurance

- Induction and refresher training are proportionate to role and risk.
- The policy lead monitors incidents, timeliness, outcomes, equality impact, recurring themes and overdue actions.
- Material breaches are reported promptly to the Headteacher and governing body/proprietor and, where required, regulators or authorities.
- This policy is reviewed at least annually and sooner after significant incidents, legal change, updated statutory guidance or evidence that arrangements are ineffective.

Related school policies

- Part 1 — Data protection and accountability
- Part 2 — Personal-data breach response
- Safeguarding and Safer Working Policy (Online safety section)

Legal and guidance framework

- UK GDPR
- Data Protection Act 2018

- Filtering and monitoring core standard (August 2026)
- KCSIE 2026
- Independent School Standards guidance (April 2026)
- Independent school inspection toolkit (August 2026)
- Equality Act 2010
- Children's Wellbeing and Schools Act 2026

Legal status note: KCSIE 2025 applies through 31 August 2026. This August review is written for implementation from 1 September 2026 and therefore adopts KCSIE 2026, the statutory mobile-phone guidance and the revised Relationships, Sex and Health Education guidance where relevant. Proposed SEND reforms are not treated as enacted duties unless commenced.

Part 5 Website cookies and online services

Policy at a glance

Purpose and scope

This policy sets out Daffodil Preparatory School's arrangements for website cookies and online services. It applies to the proprietor/governing body, leaders, employees, agency staff, contractors, volunteers, pupils and visitors where relevant, including school-organised activities off-site and online conduct connected with the school.

The school is an independent primary school in Tower Hamlets with an Islamic ethos. The welfare and best interests of children are central. Faith ethos is implemented consistently with safeguarding, equality, human rights, employment, health and safety and education law.

Policy commitments

- Act lawfully, promptly, proportionately and in the child's best interests.
- Listen to children and take account of age, development, communication, disability, SEND, EAL, culture and vulnerability.
- Keep clear, factual, secure records of decisions, actions, rationale and review.
- Escalate concerns and seek competent advice rather than allowing uncertainty to cause delay.
- Monitor implementation and learn from incidents, complaints, near misses, pupil voice and external guidance.

Responsibilities

- The proprietor/governing body retains strategic oversight, approves the policy, assures resources and receives evidence of effectiveness.
- The Headteacher implements the policy, assigns competent leads, ensures training and reports material risk or non-compliance.
- The DSL leads safeguarding aspects and is consulted whenever a child may be at risk of harm.
- The SENCO advises on SEND, disability, communication and reasonable adjustments.

- All staff follow procedures, maintain professional curiosity, record accurately and report concerns immediately.
- Pupils and parents are expected to follow school rules and are given accessible ways to ask questions, seek help and raise concerns.

Cookie controls

- Use strictly necessary cookies without consent only where permitted.
- Obtain valid consent before non-essential analytics, advertising or embedded-media cookies are set; offer equally easy withdrawal.
- Maintain an accurate cookie schedule covering provider, purpose, duration, category and third-country transfer.

Governance

- Audit the live website at least annually and after material changes.
- Do not rely on generic template wording; the notice must match the cookies actually deployed.

Equality, SEND and accessibility

The school applies the Equality Act 2010, anticipates reasonable adjustments and avoids blanket decisions. Staff distinguish deliberate misconduct from behaviour or difficulty arising from disability, SEND, communication need, trauma or medical condition. Information and processes are made accessible, and the pupil's voice is sought in a way they can understand.

Records, confidentiality and information sharing

Records are factual, dated, attributable, access-controlled and retained under the Data Protection and Information Governance Policy (retention section). Information is shared on a need-to-know basis when lawful and necessary. Safeguarding information is shared promptly to protect a child; data protection law is not used as a reason to withhold necessary safeguarding information.

Training, monitoring and assurance

- Induction and refresher training are proportionate to role and risk.
- The policy lead monitors incidents, timeliness, outcomes, equality impact, recurring themes and overdue actions.
- Material breaches are reported promptly to the Headteacher and governing body/proprietor and, where required, regulators or authorities.
- This policy is reviewed at least annually and sooner after significant incidents, legal change, updated statutory guidance or evidence that arrangements are ineffective.

Related school policies

- Part 1 — Data protection and accountability
- Privacy Notices
- Part 4 — Information security and cyber resilience

Legal and guidance framework

- UK GDPR
- Data Protection Act 2018
- ICO education guidance
- KCSIE 2026
- Independent School Standards guidance (April 2026)
- Independent school inspection toolkit (August 2026)
- Equality Act 2010
- Children's Wellbeing and Schools Act 2026

Legal status note: KCSIE 2025 applies through 31 August 2026. This August review is written for implementation from 1 September 2026 and therefore adopts KCSIE 2026, the statutory mobile-phone guidance and the revised Relationships, Sex and Health Education guidance where relevant. Proposed SEND reforms are not treated as enacted duties unless commenced.

Part 6 Recruitment privacy

Policy at a glance

Purpose and scope

This policy sets out Daffodil Preparatory School's arrangements for privacy notice for job applicants. It applies to the proprietor/governing body, leaders, employees, agency staff, contractors, volunteers, pupils and visitors where relevant, including school-organised activities off-site and online conduct connected with the school.

The school is an independent primary school in Tower Hamlets with an Islamic ethos. The welfare and best interests of children are central. Faith ethos is implemented consistently with safeguarding, equality, human rights, employment, health and safety and education law.

Policy commitments

- Act lawfully, promptly, proportionately and in the child's best interests.
- Listen to children and take account of age, development, communication, disability, SEND, EAL, culture and vulnerability.
- Keep clear, factual, secure records of decisions, actions, rationale and review.
- Escalate concerns and seek competent advice rather than allowing uncertainty to cause delay.
- Monitor implementation and learn from incidents, complaints, near misses, pupil voice and external guidance.

Responsibilities

- The proprietor/governing body retains strategic oversight, approves the policy, assures resources and receives evidence of effectiveness.

- The Headteacher implements the policy, assigns competent leads, ensures training and reports material risk or non-compliance.
- The DSL leads safeguarding aspects and is consulted whenever a child may be at risk of harm.
- The SENCO advises on SEND, disability, communication and reasonable adjustments.
- All staff follow procedures, maintain professional curiosity, record accurately and report concerns immediately.
- Pupils and parents are expected to follow school rules and are given accessible ways to ask questions, seek help and raise concerns.

Required transparency

- Identify the controller, DPO contact, data categories, sources, purposes, lawful bases, special-category conditions, recipients, retention, rights and complaint route.
- Explain criminal-record processing and overseas or automated processing where applicable.

Recruitment data

- Collect only information necessary for selection, safer recruitment and legal compliance.
- Retain unsuccessful applicant records for the stated period unless a documented reason or consent supports longer retention.

Equality, SEND and accessibility

The school applies the Equality Act 2010, anticipates reasonable adjustments and avoids blanket decisions. Staff distinguish deliberate misconduct from behaviour or difficulty arising from disability, SEND, communication need, trauma or medical condition. Information and processes are made accessible, and the pupil's voice is sought in a way they can understand.

Records, confidentiality and information sharing

Records are factual, dated, attributable, access-controlled and retained under the Data Protection and Information Governance Policy (retention section). Information is shared on a need-to-know basis when lawful and necessary. Safeguarding information is shared promptly to protect a child; data protection law is not used as a reason to withhold necessary safeguarding information.

Training, monitoring and assurance

- Induction and refresher training are proportionate to role and risk.
- The policy lead monitors incidents, timeliness, outcomes, equality impact, recurring themes and overdue actions.
- Material breaches are reported promptly to the Headteacher and governing body/proprietor and, where required, regulators or authorities.
- This policy is reviewed at least annually and sooner after significant incidents, legal change, updated statutory guidance or evidence that arrangements are ineffective.

Related school policies

- Part 1 — Data protection and accountability
- Part 3 — Retention, legal holds and disposal

- Safer Recruitment Policy

Legal and guidance framework

- UK GDPR
- Data Protection Act 2018
- ICO education guidance
- KCSIE 2026
- Independent School Standards guidance (April 2026)
- Independent school inspection toolkit (August 2026)
- Equality Act 2010
- Children's Wellbeing and Schools Act 2026

Legal status note: KCSIE 2025 applies through 31 August 2026. This August review is written for implementation from 1 September 2026 and therefore adopts KCSIE 2026, the statutory mobile-phone guidance and the revised Relationships, Sex and Health Education guidance where relevant. Proposed SEND reforms are not treated as enacted duties unless commenced.

Part 7 Monitoring, accountability and review

Equality, SEND and accessibility

Decisions must be fair, evidence-based and free from unlawful discrimination. Staff identify and record reasonable adjustments, accessible communication and support required by disability, SEND, medical need, language, religion or belief and other protected characteristics.

Safeguarding priority

Any concern that may indicate abuse, neglect, exploitation, peer-on-peer harm, self-harm, significant vulnerability or risk of serious harm is referred immediately to the DSL. Policy processes must not delay emergency or safeguarding action.

Records and confidentiality

The responsible lead records the decision, evidence, action, communication, support, adjustment, owner and review date in the appropriate secure system. Information is shared on a lawful, necessary and proportionate basis and retained under the school's information-governance requirements.

Training and implementation

The policy owner identifies role-specific induction, refresher training, drills or competency checks. Leaders sample implementation and records, address inconsistency promptly and report material themes and risks to governors.

Review and continuous improvement

The policy is reviewed at least annually, and sooner after a serious incident, complaint, audit finding, statutory or guidance change, recurring pattern or evidence that controls are ineffective. Pupil, parent and staff voice is considered where relevant.

Data Protection and Information Governance Policy, version 3.0, effective August 2026. This document supersedes the corresponding earlier policy drafts included within it. Previous files remain version-history records and must not be used as concurrent instructions.

Part 8 Putting the policy into practice

Accountability and children's higher protection

- Build privacy into new systems, forms, apps, monitoring and data-sharing arrangements from the outset, applying the children's higher protection matters duty introduced through the Data (Use and Access) Act 2025.
- Complete and approve a data protection impact assessment before high-risk processing begins, including systematic monitoring, biometrics, special-category data, safeguarding technology or large-scale children's data.
- State and document the lawful basis for each purpose; consent is used only where it is genuinely optional and can be withdrawn without detriment.
- Give children and parents concise, accessible privacy information appropriate to the child's age and understanding.

Breach, rights and information sharing

- Report suspected loss, misdirection, unauthorised access, cyber incident or disclosure immediately to the data protection lead; preserve evidence and do not conceal or privately remedy the incident.
- Assess risk promptly and notify the ICO within 72 hours of awareness where the legal threshold is met; notify affected people without undue delay where high risk requires it.
- Log all breaches and near misses, including facts, effects, containment, notification decision, rationale, lessons and completed actions.
- Data protection law is not a barrier to necessary safeguarding information sharing: record what was shared, with whom, why, under which basis and any decision not to share.

Processors, retention and assurance

- Conduct due diligence and put an Article 28-compliant contract in place before a processor handles school data; review security, sub-processors, location, deletion and incident support.
- Apply the retention schedule and legal holds consistently, dispose securely and test restoration, access control and off-boarding arrangements.
- Principal framework: UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025 and ICO accountability guidance updated February 2026.

Information security and cyber resilience

- Apply least privilege, multi-factor authentication where supported, secure configuration, timely patching, malware protection, encryption and controlled administrator access according to risk.
- Joiner, mover and leaver controls create, change and disable access promptly; shared accounts are avoided and privileged activity is attributable to an authorised person.
- Back up critical information on a tested schedule, keep an appropriately separated copy and test restoration and continuity rather than assuming a successful backup log proves recoverability.
- Report phishing, credential disclosure, unusual device behaviour or suspected compromise immediately; isolate safely, preserve evidence and coordinate technical, safeguarding, data-breach and communication decisions.
- Assess suppliers for security, resilience, data location, incident notification, deletion and exit support, and maintain an inventory of systems, owners and critical dependencies.

Website, cookies and online services

- Use non-essential cookies or similar technologies only after valid consent; essential technologies are limited to what is necessary for the service and described transparently.
- Maintain an accurate cookie notice stating provider, purpose, duration and category, and make withdrawing or changing consent as easy as giving it.
- Review website forms, analytics, embedded media and third-party scripts periodically so the notice and consent controls reflect what the site actually deploys.

Recruitment privacy and applicant records

- Give applicants a recruitment privacy notice explaining purposes, lawful bases, recipients, retention, rights and any criminal-offence or special-category processing.
- Limit access to recruitment information, transmit references and checks securely and avoid collecting irrelevant family, health or protected-characteristic information outside a lawful purpose.
- Keep equality monitoring separate from selection wherever practicable and report only anonymised or appropriately aggregated information.
- Retain unsuccessful and successful applicant records according to the schedule and any legal hold, then dispose securely; transfer only necessary information into the personnel file.

References and statutory guidance

Linked titles open the current published source. Check the source page for later updates when this policy is reviewed.

1. [**Independent School Standards guidance**](#) - Department for Education, April 2026.
2. [**Keeping children safe in education 2026**](#) - Department for Education; in force from 1 September 2026.
3. [**Working together to safeguard children 2026**](#) - HM Government, updated March 2026.
4. [**Education inspection toolkits and supporting evidence**](#) - Ofsted; September 2026 inspection materials.