



## **Privacy Policy**

### **Phase of school this policy relates to**

<b>Early Years</b>	<b>Primary</b>	<b>Secondary</b>	<b>Whole School</b>
--------------------	----------------	------------------	---------------------

<b>Date created:</b>	<b>July 2019</b>
<b>Date reviewed:</b>	<b>Sept 2025</b>
<b>Next review date:</b>	<b>Autumn 1 -2027</b>
<b>Policy lead staff member:</b>	<b>Lisa Behan</b>
<b>Link governor:</b>	<b>Ashley Bergen</b>

## **Privacy Policy**

*(To be read in conjunction with our UK GDPR & Data Protection Policy)*

## **WHAT IS THIS NOTICE FOR?**

This notice explains how Liberty Woodland School uses ("processes") personal data about individuals including: staff; current and prospective pupils; parents, carers or guardians (referred to as "parents"); and future alumni.

This information is provided in line with the rights of individuals under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, which ensure individuals understand how their data is used.

Staff, parents and pupils are encouraged to read this Privacy Notice and understand the school's obligations to its community.

This Privacy Notice applies alongside any other information the school provides about a particular use of personal data (e.g. on forms), and in addition to the school's other relevant policies, including:

- Contracts with staff or parents of pupils
- Policy on taking, storing and using images of children
- Data Storage and Retention Policy
- Safeguarding and health and safety policies
- IT and e-safety policies

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) must also comply with this Privacy Notice.

---

## RESPONSIBILITY FOR DATA PROTECTION

The school's **Data Protection Officer (DPO)** oversees compliance and will deal with requests concerning the use of personal data. You can contact the DPO at: **office@libertywoodlandschool.com**.

---

## WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

To fulfil its obligations to staff, pupils and parents, the school may process a wide range of personal data. Processing may be required to:

- Fulfil contractual and legal obligations
- Protect vital interests (e.g. safeguarding, health and safety)
- Perform public tasks (e.g. education provision, safeguarding duties)
- Pursue the school's **legitimate interests**, balanced against the rights of individuals

Examples include:

- Pupil selection, admissions, teaching, progress monitoring, exams, references

- Safeguarding, pastoral care, and health care
- Compliance with inspections, regulatory reporting, and Department for Education requirements
- Operational management, fee administration, HR and payroll
- Photographic use in line with consent and school policies
- Promotion of the school through publications, website and social media
- Maintaining alumni and community relations

The school may also process **special category data** (health, ethnicity, religion, SEN) and **criminal records data** (e.g. DBS checks) where legally required, for safeguarding, employment or with explicit consent.

---

## TYPES OF PERSONAL DATA PROCESSED

Examples include:

- Names, addresses, contact details
  - Car details (for parking)
  - Bank details and financial information (for fee payments)
  - Pupil records (academic, disciplinary, admissions, SEN, attendance)
  - Health information and next of kin
  - References from previous schools/employers
  - Images of pupils and staff (in line with policy)
- 

## HOW DATA IS COLLECTED

Most data is collected directly from individuals (or parents for pupils), but it may also come from third parties (e.g. other schools, professionals, authorities) or publicly available sources.

---

## WHO HAS ACCESS TO DATA / DATA SHARING

Personal data is used internally on a strict “need to know” basis. It may also be shared with:

- Professional advisers (lawyers, accountants)
- Authorities (HMRC, police, local authority, inspectorates)
- IT system providers, cloud storage, web developers (always under contract)

Special protections apply to:

- Medical records (restricted access)
- Safeguarding files (restricted to DSL and safeguarding team)
- Pastoral files

The school is under statutory duties (e.g. **Keeping Children Safe in Education**) to record or report concerns regardless of proof where thresholds of seriousness are met.

---

## DATA RETENTION

Personal data is kept only as long as necessary, in line with the school’s **Storage and Retention Policy**. Ordinary staff/pupil files are retained for a standard period after departure. Safeguarding files are retained longer, as required by law.

---

## COMMUNICATIONS AND MARKETING

With consent, the school may contact parents, alumni, and the wider school community with newsletters, updates, and event information via email or post. Individuals may withdraw consent or object to marketing at any time.

---

## INDIVIDUAL RIGHTS

Under UK GDPR, individuals have the right to:

- Access their personal data (Subject Access Requests will be responded to within **1 month**)

- Rectify inaccurate data
- Erase data (where lawful)
- Restrict or object to processing
- Data portability
- Withdraw consent (where relied upon)

Parents may make SARs for their children, but data is considered the child's in law. Requests will be assessed case by case depending on the child's age and understanding.

Some data may be exempt from disclosure (e.g. references, legal privilege, third-party information).

---

## DATA ACCURACY AND SECURITY

The school will:

- Take steps to ensure data is accurate and up to date
- Require individuals to notify the office of changes
- Protect data through technical and organisational security measures (passwords, access controls, secure storage)
- Train staff on their data protection responsibilities

---

## QUERIES AND COMPLAINTS

For questions about this Privacy Notice or how the school processes data, please contact the DPO at **[office@libertywoodlandschool.com](mailto:office@libertywoodlandschool.com)**.

If you are not satisfied, you may raise a complaint via the school's complaints procedure. You also have the right to complain to the **Information Commissioner's Office (ICO)**, though the ICO recommends raising the issue with the school first.