



Catherine School of London

Data Protection Policy

Date: 15 May 2025

Review Date: Annually or upon legal or operational changes

1. Policy Statement

Catherine School of London is committed to protecting the privacy and personal data of all individuals, including students, staff, contractors, and stakeholders. We recognise our responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and we are committed to processing personal data lawfully, fairly, and transparently.

This policy outlines how we collect, use, store, share, and dispose of personal data, and sets out the rights of individuals in relation to their data.

2. Scope

This policy applies to all staff, students, contractors, and third parties who have access to personal data held by the Catherine School of London. It covers all personal data in any format – digital, paper, audio, or video.

3. Legal Framework

This policy is based on the following legislation:

- **UK General Data Protection Regulation (UK GDPR)**
 - **Data Protection Act 2018**
 - **Privacy and Electronic Communications Regulations (PECR)**
 - **Freedom of Information Act 2000** (where applicable)
 - **Education (Pupil Information) Regulations 2005**
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4. Data Protection Principles

In accordance with UK GDPR, Catherine School of London commits to ensuring personal data is:

1. **Processed lawfully, fairly and transparently**
 2. **Collected for specified, explicit, and legitimate purposes**
 3. **Adequate, relevant, and limited to what is necessary**
 4. **Accurate and kept up to date**
 5. **Kept for no longer than necessary**
 6. **Processed securely**, using appropriate technical and organisational measures
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5. Lawful Bases for Processing

We will only process personal data where we have a **lawful basis**, which may include:

- **Consent** (e.g. for marketing)
 - **Contractual obligation** (e.g. employment or student agreements)
 - **Legal obligation** (e.g. safeguarding, HMRC reporting)
 - **Vital interests** (e.g. emergencies)
 - **Public task** (e.g. education services)
 - **Legitimate interests** (where this does not override the rights of the data subject)
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6. Types of Data We Process

We may collect and process the following types of personal data:

For Students:

- Name, address, contact details
- Date of birth, gender, nationality
- Education history, qualifications, attendance records
- Medical information (where necessary)
- Special educational needs and support requirements
- Photos or video recordings (e.g. for marketing, ID, or events)
- Learning progress and achievement records

For Staff and Contractors:

- Contact details, emergency contacts
- Employment history, qualifications, DBS checks
- Payroll and financial data
- Training records
- Appraisal and disciplinary records

For Online Users (if applicable):

- IP addresses, login activity, cookies (via our website or VLE)
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7. Data Subject Rights

Under UK GDPR, individuals have the following rights:

- **Right to be informed** – about how their data is used
- **Right of access** – to their personal data
- **Right to rectification** – of inaccurate or incomplete data
- **Right to erasure** – in certain circumstances ("right to be forgotten")
- **Right to restrict processing**
- **Right to data portability**
- **Right to object** – to processing for certain purposes
- **Rights related to automated decision-making and profiling** (if applicable)

Requests relating to these rights must be submitted in writing to the Data Protection Officer and will be responded to within one calendar month.

8. Data Sharing

We may share personal data with third parties where necessary, such as:

- Awarding bodies (e.g. Focus Awards)
- Regulatory authorities (e.g. Ofqual, ESFA, HMRC)
- Health and safety authorities (in case of incidents)
- External IT or learning platform providers
- Local authorities (for safeguarding)
- Employers (for work placements or apprenticeship coordination)

Data will **only** be shared with appropriate safeguards in place, and never for marketing without consent.

9. Data Security

We take data security seriously and implement appropriate measures to protect personal data from unauthorised access, alteration, disclosure, or destruction. Measures include:

- Password-protected and encrypted systems
- Regular staff training in data protection and cyber awareness
- Secure file storage (physical and digital)
- Access control and user permissions

- Regular audits and reviews of our data protection processes
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10. Data Retention

Personal data will not be kept longer than necessary for the purpose for which it was collected. Our **Data Retention Schedule** defines retention periods based on legal, regulatory, and operational requirements.

Examples:

- Student records: typically retained for 6 years after completion
 - Staff records: 6 years after termination of employment
 - Financial records: 6–7 years for audit purposes
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11. Data Breach Procedure

In the event of a data breach:

1. The breach must be reported immediately to the **Data Protection Officer (DPO)**.
 2. A full investigation will be conducted.
 3. If the breach poses a risk to individuals' rights or freedoms, it will be reported to the **Information Commissioner's Office (ICO)** within **72 hours**.
 4. Affected individuals will be informed where required.
 5. Preventative measures will be reviewed and strengthened as needed.
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12. Staff Responsibilities

All staff must:

- Handle personal data responsibly and in line with this policy
 - Complete data protection training annually
 - Report any concerns or breaches immediately
 - Not share personal data without authorisation
 - Use strong passwords and secure systems
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13. Monitoring & Review

This policy will be reviewed **annually**, or earlier if changes in the law or organisational practices require it.

15. Policy Approval

This policy is approved by the senior management of Catherine School of London.

Tahir Khan / Director

Date: 15 May 2025