



Nurturing **Ambition Through a Living Faith**

Data Protection Policy

1. Mission, Vision, and Values

Mission Statement

Nurturing ambition through a living faith.

Vision Statement

Our academy delivers a purposeful curriculum through its living Christian faith. We nurture ambition in all of our learners in order for them to become positive citizens of tomorrow.

Scriptural Foundation

"Let us not love with words or speech alone but with actions and truth."

— 1 John 3:18

2. Statutory Legislation & Regulatory Framework

This policy outlines how Darwen St James' C of E Primary Academy collects, processes, stores, and shares personal data in compliance with current UK data protection legislation:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018** (superseding the Data Protection Act 1998)
- **The Education (Pupil Information) (England) Regulations 2005**
- **Keeping Children Safe in Education (KCSIE)**
- **Cidari Multi-Academy Trust Data Protection Governance Framework**

The academy acts as a **Data Controller** for the personal data it holds about pupils, parents, staff, and visitors.

3. Data Protection Principles

We process personal data in strict accordance with the core UK GDPR principles. Personal data must be:

1. Processed lawfully, fairly, and in a transparent manner.
2. Collected for specified, explicit, and legitimate purposes.
3. Adequate, relevant, and limited to what is necessary.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits identification of data subjects for no longer than is necessary.
6. Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.

4. Categories of Pupil Information We Collect and Hold

To support learning, wellbeing, and regulatory compliance, we collect, hold, and share personal information relating to our pupils (and may receive data from previous schools, early years settings, local authorities, or the DfE):

- **Personal Identifiers & Contacts:** Names, address, date of birth, emergency contact details.
- **Characteristics:** Ethnicity, primary language, free school meal eligibility, and socio-economic indicators.
- **Academic & Attainment:** National Curriculum assessment outcomes, phonics check results, internal progress data, and post-primary transition records.
- **Attendance & Punctuality:** Sessions attended, absence reasons, and lates.
- **Special Educational Needs (SEND):** Individual Education Plans, EHCPs, specialist support assessments, and agency involvement.
- **Medical & Health:** Relevant medical conditions, allergies, medication records, and school nurse information.
- **Safeguarding & Pastoral:** Pupil welfare concerns, child protection records, and behavioral reports.

5. Lawful Basis for Processing Personal Data

We only collect and process personal information when the law allows us to. Most commonly, we process data under the following lawful bases:

1. **Public Task / Statutory Duty:** To fulfill our legal obligations as a state-funded academy (e.g., educational delivery, statutory assessments, attendance reporting).
2. **Legal Obligation:** To comply with statutory requirements such as safeguarding under KCSIE.
3. **Vital Interests:** To protect the life or safety of a pupil or individual in emergency medical situations.
4. **Consent:** Where we require explicit permission (e.g., specific promotional photographs/videos or non-statutory extra-curricular platforms). Consent can be withdrawn at any time.

6. Sharing Pupil and Parent Data

We do not give information about our pupils or parents to anyone without consent, unless legislation, statutory guidance, or our policies permit us to do so.

We routinely share information on a statutory or contractual basis with:

- **The Department for Education (DfE):** Through statutory census returns.
- **Blackburn with Darwen Borough Council:** Local Authority Inclusion, SEND, and Social Care teams.
- **Cidari Multi-Academy Trust:** Central management and governance auditing.
- **Secondary Schools / Alternative Provision:** To ensure smooth educational transitions.
- **Approved Third-Party Systems:** Strictly vetted educational software providers (e.g., Target Tracker, ClassDojo, ParentPay, CPOMS) under robust Data Processing Agreements.

DfE & National Pupil Database (NPD)

The DfE collects personal data from educational settings via statutory data collections. This data is stored in the National Pupil Database (NPD). Third parties requesting access to NPD data must undergo a rigorous approval process evaluating security, confidentiality, and exact necessity.

For details regarding DfE data requests, visit:

<https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

7. Individual Rights (Subject Access Requests)

Under UK GDPR, individuals (or parents/carers acting on behalf of pupils) have specific rights regarding their personal data:

- **Right of Access:** The right to request a copy of the personal information held about them (a Subject Access Request / SAR).
- **Right to Rectification:** The right to request correction of inaccurate or incomplete data.
- **Right to Erasure / Restriction:** The right to request deletion or restriction of processing where applicable under the law.

Making a Subject Access Request

If you wish to make a formal Subject Access Request or have questions about how your data is handled, please contact our Academy Business Manager:

- **Contact:** Mrs Kathryn Ashcroft-Gardner (Business Manager)
- **Address:** Darwen St James' C of E Primary Academy, St James Crescent, Darwen, BB3 0EY
- **Telephone:** 01254 703260
- **Email:** dsjoffice@cidari.co.uk

8. Data Storage, Security, and Retention

Personal data is stored securely in electronic format on encrypted servers and cloud systems, or in locked, access-restricted filing systems. Data is retained in alignment with the Information and Records Management Society (IRMS) Toolkit for Schools and Cidari MAT retention schedules, after which it is securely destroyed or permanently anonymised.

9. Policy Review and Linked Documentation

This policy is monitored by the Headteacher and Cidari Trust Data Protection Officer (DPO) and approved annually by the Local Governing Body.

Linked Policies

- Privacy Notices (Pupils, Staff, and Parents)
- Online Safety & Acceptable Use Policy
- Safeguarding & Child Protection Policy
- Information Security & Freedom of Information Policy

