Wolverdene Special School
Data Protection Policy 2026

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Approved for the School Headteacher: N Akhmatova Date: 17th March 2026	 Signature:
Approved by the Governing Body: Chair/Deputy: Jo Lloyd Date: 17th March 2026	 Signature:
This procedure will be reviewed at least every two years. The next review is March 2028	

Data Protection Policy

The School collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

Throughout this policy the term "school" reflects both the educational and residential setting unless specifically indicated.

The school is the Data Controller of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer, who is the Admin Officer and may be contacted at Wolverdene Special School on 01264 362350 or s.eaton@wolverdene.hants.sch.uk.

The school issues Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and with whom it may be shared. It also provides information about an individual's rights in respect of their personal data.

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the GDPR, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

What is Personal Information/ data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by

reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes, but is not limited to, an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times. In particular, personal data shall be:

1. processed lawfully, fairly and in a transparent manner;
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes);
3. adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive;
4. accurate and, where necessary, kept up to date;
5. kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Duties

Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

Data Controllers have a general duty of accountability for personal data.

Commitment

The school is committed to maintaining the principles and duties in the GDPR at all times. Therefore, the school will:

- Inform individuals of the identity and contact details of the data controller;
- Inform individuals of the contact details of the Data Protection Officer;
- Inform individuals of the purposes that personal information is being collected and the basis for this;
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this;
- If the school plans to transfer personal data outside the EEA the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information;
- Inform individuals of their data subject rights;
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point;

- Provide details of the length of time an individual's data will be kept;
- Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected the school shall inform the individual and where necessary seek consent;
- Check the accuracy of the information it holds and review it at regular intervals;
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in;
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded;
- Ensure that personal information is not retained longer than it is needed;
- Ensure that when information is destroyed that it is done so appropriately and securely;
- Share personal information with others only when it is legally appropriate to do so;
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests);
- Ensure that personal information is not transferred outside the EEA without the appropriate safeguards;
- Ensure that all staff and governors are aware of and understand these policies and procedures.
- In the event of a potential data breach the school will contact the ICO in the first instance and seek advice and next steps.

Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk

EQUALITIES, SAFEGUARDING AND EQUAL OPPORTUNITIES STATEMENT

Wolverdene School, in all policies and procedures, will promote equality of opportunity for children and staff from all social, cultural and economic backgrounds and ensure freedom from discrimination on the basis of membership of any group including gender, sexual orientation, family circumstance, ethnic or national origin, disability (physical or mental) religious or political beliefs.

As part of our commitment to meet the Public Sector Equality Duty (PSED), Wolverdene School aims to:

- Provide opportunity to all
- Foster good relations, and create effective partnership with all sections of the community
- Only take actions which do not discriminate unlawfully in service delivery, commissioning and employment

- Provide an environment free from fear and discrimination, where diversity, respect and dignity are valued
- Demonstrate zero tolerance to any form of bullying, harassment or abuse.