



DATA PROTECTION & GDPR

Key Guidance for Schools & Trusts

PRIVACY • COMPLY • PROTECT • RESPECT

Good data protection builds trust, protects pupils and staff, and helps schools and trusts meet their legal obligations.



This guidance supports the, UK GDPR, the Data Protection Act 2018 and ICO guidance for schools and trusts.

PRINCIPLES

1. WHAT IS UK GDPR?



- ✓ UK GDPR set rules for how organisations collect, use store and share personal data
- ✓ It applies to all schools and Trusts
- ✓ The Data Protection Act 2018 works alongside UK GDPR

★ Protecting data protects people.

2. WHO IS RESPONSIBLE?



- ✓ The trust or governing body is usually the Data Controller
- ✓ Leaders decide why and how data is used
- ✓ All staff must handle data lawfully and securely
- ✓ Accountability starts at the top

★ Clear roles reduce risk.

3. LAWFUL BASIS



- ✓ You must have a lawful basis before processing personal data
- ✓ Common bases include legal obligation, public task, vital interests, public task, consent and legitimate interest
- ✓ Consent is not always the right basis
- ✓ Record and review your decision

★ Always evidence your basis.

4. PERSONAL DATA



- ✓ Names, contact details and ID numbers
- ✓ Attendance, behaviour and assessment data
- ✓ Photos, CCTV images and recordings
- ✓ Health, safeguarding and online identifiers

★ If it identifies someone, protect it.

5. SPECIAL CATEGORY DATA



- ✓ Includes health, racial or ethnic origin, religion or beliefs
- ✓ Includes biometric and genetic data
- ✓ Requires extra safeguards and clear conditions
- ✓ Handle with additional care

★ Sensitive data needs safeguards.

6. INDIVIDUAL RIGHTS



- ✓ Individuals have rights to be informed and access their data
- ✓ Rights include rectification, erasure, restriction, portability and object to processing
- ✓ Respond to requests promptly
- ✓ Keep evidence of decisions and actions

★ Respect rights and respond on time.

KEY ACTIONS

- REVIEW**
Check ROPA, policies and lawful basis.
- INFORM**
Keep privacy notices clear and current.
- SECURE**
Restrict access and protect personal data.
- RESPOND**
Handle SARs and breaches on time.
- IMPROVE**
Use audits to strengthen practice.

GOVERNANCE QUESTIONS

- 01 Who is accountable for data protection?
- 02 Do we know what data we hold and why?
- 03 Are privacy notices and records up to date?
- 04 Are SARs and breaches handled on time?
- 05 Can we evidence training, DPIAs and reviews?

USEFUL CONTACTS

- National Cyber Security Centre**
<https://www.ncsc.gov.uk>
- Action Fraud**
<https://www.reportfraud.police.uk>

- ICO**
<https://ico.org.uk>
- Department for Education**
<https://gov.uk>



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Part of the SBS Insight Hub Professional Guidance Series



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PRACTICAL GUIDANCE

A practical continuation page for rights, requests, breaches, retention, resources and compliance checks.



NEED HELP OR ADVICE?

Contact your DPO, data protection lead or the SBS team for support with GDPR compliance, SARs, breaches or assurance.



THE 5 KEY ACTIONS



REVIEW

Check policies, ROPA and lawful bases regularly.



SECURE

Apply access controls, MFA and data minimisation.



INFORM

Keep privacy notices clear and up to date.



RESPOND

Meet SAR and breach deadlines; record decisions.



IMPROVE

Use audits, incidents and DPIAs to strengthen practice.

7. SUBJECT ACCESS REQUESTS

- ✓ Individuals have the right to access their data
- ✓ Respond within one month of receipt
- ✓ Verify identity before sharing information
- ✓ Provide the information in a clear and commonly used format
- ✓ Keep a SAR register and decision record

★ Respond clearly and on time.

8. DATA BREACHES

- ✓ Assess risk to people promptly
- ✓ Report certain breaches to the ICO within 72 hours
- ✓ Inform affected individuals without undue delay if the breach is likely to result in high risk
- ✓ Keep a breach log including actions taken and outcomes

★ Prompt action reduces harm.

9. PRIVACY NOTICES

- ✓ Provide clear, concise and accessible privacy information
- ✓ Explain what data you collect, why and who you share it with
- ✓ Review and update notices regularly
- ✓ Be transparent

★ Be transparent and proportionate.

GDPR COMPLIANCE CHECKLIST

	Yes	No	In Progress	N/A
Privacy notices are up to date for all audiences	☐	☐	☐	☐
Records of processing activities are maintained	☐	☐	☐	☐
Lawful bases are recorded for processing activities	☐	☐	☐	☐
Data sharing agreements are reviewed	☐	☐	☐	☐
Staff receive regular data protection training	☐	☐	☐	☐
Subject Access Requests are logged and tracked	☐	☐	☐	☐
A breach response process is in place	☐	☐	☐	☐
Data is retained only as long as necessary	☐	☐	☐	☐
DPIAs are completed where required	☐	☐	☐	☐
Policies and procedures are reviewed regularly	☐	☐	☐	☐

10. DATA SHARING

- ✓ Share data only when there is a clear lawful basis
- ✓ Use data sharing agreements or contracts where appropriate
- ✓ Ensure data is accurate, relevant and limited to the purpose
- ✓ Work with trusted partners who meet data protection standards

★ Share the minimum necessary.

11. DATA RETENTION

- ✓ Keep personal data no longer than necessary
- ✓ Follow retentions schedules
- ✓ Review data regularly and securely. Delete or anonymise when no longer needed.
- ✓ Include retention rules in your records management policy

★ Record retention actions.

12. ACCOUNTABILITY

- ✓ You are accountable for compliance with UK GDPR
- ✓ Maintain records of processing activities (ROPA)
- ✓ Carry out Data Protection Impact Assessments (DPIAs)
- ✓ Provide staff training
- ✓ Review policies and procedures

★ Record actions and retain evidence.

USEFUL RESOURCES



NCSC - Cyber Security for Schools

<https://www.ncsc.gov.uk/section/education-skills/cyber-security-schools>



UK Safer Internet Centre - Resources

<https://saferinternet.org.uk/>



ICO School resources

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources>



NCSC - Resources for schools

<https://www.ncsc.gov.uk/information/resources-for-schools>



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