



DATA PROTECTION POLICY & PRIVACY NOTICE

2025-2026

Introduction

Fareham and Gosport Primary SCITT follows Harrison Primary School policies and procedures related to data protection and privacy notices. 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.

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 may be contacted via the School Office.

The school issues Privacy Notices (also known as Fair Processing Notices) to all pupils/parents and staff on entry to the school. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. 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:

1. Personal data shall be processed lawfully, fairly and in a transparent manner,
2. Personal data shall be 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. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive,
4. Personal data shall be accurate and where necessary, kept up to date,
5. Personal data shall be 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,
6. Personal data shall be processed in a manner that ensures appropriate security of the personal.

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, this information is on the Privacy Notice,
- Inform individuals of the contact details of the Data Protection Officer, this information is on the Privacy Notice,
- Inform individuals of the purposes that personal information is being collected and the basis for this, this information is on the Privacy Notice,
- 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, this is linked to Hampshire County Council's retention policy,
- 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. We will remind parents on a regular basis to keep us informed of changes to details and to complete new forms at the beginning of each academic year,
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in. All members of staff will have training in keeping all data safe and secure,
- 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,
- All staff will be aware of and comply with the Do's and Don'ts in relation to Data Security in Appendix A.

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

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every two years. The policy review will be undertaken by the Data Protection Officer, Head teacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact the school office who will also act as the contact point

Contact details: 01329 234016 or e-mail queries to adminoffice@harrison.hants.sch.uk

APPENDIX A

What Trainee Teachers should do:

- DO** get the permission of your manager to take any confidential information home,
- DO** transport information from school on secure computing devices (i.e. encrypted laptops and encrypted memory sticks). Wherever possible avoid taking paper documents out of the office,
- DO** use secure portable computing devices such as encrypted laptops and encrypted USB memory sticks when working remotely or from home,
- DO** ensure that any information on USB memory sticks is securely deleted off the device, or saved on a School shared drive,
- DO** ensure that all paper based information that is taken off premises is kept confidential and secure, ideally in a sealed envelope which indicates a return address if misplaced,
- DO** ensure that any confidential documents that are taken to your home are stored in a locked drawer,
- DO** ensure that paper based information and laptops are kept safe and close to hand when taken out of premises. Never leave them unattended. Particular care should be taken in public places (e.g. reading of documentation on public transport),
- DO** ensure that when transporting paper documentation in your car that it is placed in the boot (locked) during transit,
- DO** return the paper based information to the School as soon as possible and file or dispose of it securely,
- DO** report any loss of paper based information or portable computer devices to your line manager immediately,
- DO** ensure that all postal and e-mail addresses are checked to ensure safe dispatch of information. When sending personal information by post the envelope should clearly state 'Private – Contents for Addressee only',
- DO** ensure that when posting/emailing information that only the specific content required by the recipient is sent,
- DO** use pseudonyms and anonymise personal data where possible,
- DO** ensure that access to SIMS (or equivalent) is restricted to appropriate staff only, that leavers are removed in a timely manner and that generic user names such as 'Sysman' are disabled.

What trainee teachers must not do:

- DO NOT** take confidential information to an entertainment or public place such as a pub or cinema, whether held on paper or an electronic device. Any information must be taken to the destination directly and never left unattended during the journey,
- DO NOT** unnecessarily copy other parties into e-mail correspondence,
- DO NOT** e-mail documents to your own personal computer, (where trainees are not provided with a school laptop and use their own device, they will ensure that all requirements from this policy are adhered to in full)
- DO NOT** store work related documents on your home computer, (where trainees are not provided with a school laptop and use their own device, they will ensure that all requirements from this policy are adhered to in full).
- DO NOT** leave personal information unclaimed on any printer or fax machine,
- DO NOT** leave personal information on your desk overnight, or if you are away from your desk in meetings,
- DO NOT** leave documentation in vehicles overnight,
- DO NOT** discuss case level issues at social events or in public places,
- DO NOT** put confidential documents in non-confidential recycling bins,
- DO NOT** print off reports with personal data (e.g. pupil data) unless absolutely necessary,
- DO NOT** use unencrypted memory sticks or unencrypted laptops.

FAREHAM & GOSPORT PRIMARY SCITT PRIVACY NOTICE

Privacy Notice (How we use personal information)

The Fareham & Gosport Primary SCITT treats very seriously both the personal data and the sensitive personal data it processes on behalf of primarily its trainee teachers, SCITT partnership members and staff members, and also a wide range of other people who it works with and has contact with. These include for example potential trainee teachers, visitors, members of the public, and people it works with as a SCITT.

Why do we collect and use personal information?

We collect and use personal information:

- To support trainee teacher learning
- To monitor and report on trainee teacher progress
- To provide appropriate pastoral care
- To assess the quality of our services and how well our SCITT is doing
- Statistical forecasting and planning
- To comply with the law regarding data sharing
- To comply with DfE census and returns
- To communicate with the University of Roehampton, Student Finance, DBS barring service, SCITT Partnership schools, ECT Schools, DfE, Ofsted, external moderators/examiners and local authority occupational health (if applicable)

The categories of personal information that we collect, hold and/or share include:

- Personal information (such as name, address, contact number & email address)
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance information (such as training attended, number of absences and absence reasons)
- Assessment information
- Relevant medical & special educational needs

The General Data Protection Regulation allows us to collect and use personal information with consent of the data subject, where we are complying with a legal requirement, where processing is necessary to protect the vital interests of a data subject or another person and where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. When the personal information is Special Category Information we may rely on processing being in the substantial public interest in addition to consent of the data subject and the vital interests of the data subject or another.

Our requirement for this data and our legal basis for processing this data includes the Education Act 1996, 2002 and 2011, The Children's Act 1989 and 2004, Education and Skills Act 2008, Schools Standards and Framework Act 1998 and the Equalities Act 2010.

We collect Personal Data on the following legal basis:

Compliance with a legal obligation

Protection of vital interests

Public Task

We collect Special Category Data on the following legal basis:

To protect vital interests of the data subject and if consent is not feasible

Collecting personal information

Whilst the majority of personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain personal information to us or if you have a choice in this. Where we are using your personal information only on the basis of your permission you may ask us to stop processing this personal information at any time.

Storing personal data

We hold data for / in accordance with our retention schedule (information on our Data Mapping Form – held in School Office). All data is kept either electronically or paper copies. All electronic data is kept on databases that are password protected. All paper records are kept in locked cupboards with access for SCITT staff only.

Who do we share SCITT information with?

We routinely share personal information with:

- Partner Schools & ECT schools
- Our Local Authority and other Local Authorities
- The Department for Education (DfE)
- University of Roehampton
- Ofsted & external moderators/examiners
- Other agencies such as Student Loans

Why we share personal information

We do not share personal information with anyone without consent unless the law and our policies allow us to do so. This data sharing underpins SCITT funding, policy and monitoring.

Data collection requirements:

To find out about the data collection requirements on us by the Department of Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Mrs Lauren Pidgeon, Harrison Primary School, School Business Manager, Data Protection Officer.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner Office at <https://ico.org.uk/concerns/>

Contact: Harrison Primary School, Harrison road, Fareham, Hants, PO16 7EQ Tel: 01329 234016. If you would like to discuss anything in this privacy notice, please contact:

- Mrs Lauren Pidgeon, School Business Manager, Data Protection Officer

Policy dated: July 2025 using current guidelines

I acknowledge receipt and agree to follow this Data Protection and Privacy Policy for the Fareham and Gosport Primary SCITT PGCE Programme.

Name: _____ **Signature:** _____ **Date:** _____