Devonshire House Preparatory School

Overarching Data Protection Policy

Last review date	*October 2026*
Next review date	*July 2027*
Lead reviewer	*David Zerafa*

Serving North London Families

Devonshire House is a co-educational prep school, offering unparalleled preparation for senior school and life thereafter. Our unwavering emphasis on individual growth, within an inclusive community, balances traditional values and modern practice to inspire fearless life-long learning.

Our school values are:

Growth – we reach high
Courage – we learn fearlessly
Wonder – we are inspired to find our spark
Belonging – we care and come together

1. Purpose

1.1 This document outlines the framework that the School has in place to help ensure compliance with data protection law, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

1.2 Any references to staff include peripatetic staff, gap year students and Governance.

2. Roles, Responsibilities and Governance

2.1 Governance have appointed the Head as Data Protection Lead. The Head is responsible for managing the School's compliance with data protection law. Governance have ensured that the Headmistress has sufficient time and resources to fulfil their tasks.

2,2 The Head regularly reports to Governance who are responsible for the School's data protection compliance. Data protection is a standing item on the agenda at meetings with Governance.

2.3 All staff have a role to play in our data protection compliance. Staff are encouraged to ask questions and raise concerns with the Head or their line manager.

This allows us to regularly review and strengthen the data protection measures which we have in place.

3. Compliance Measures

3.1 The School helps to ensure compliance with data protection law using the measures outlined at 4 to 13 below.

4. Training

4.1 All staff receive data protection training as part of their induction and refresher training is provided every two years. The training delivered in person by the Head. Data Protection Policy Page 2

4.2 The training includes (but is not limited to) the practical application of the GDPR's principles in a school context, guidance on how to keep personal data secure and when staff should speak to the Head.

4.3 The SLT and Governance receive additional training on an annual basis.This training has been specifically designed for their roles.

4.4 The Head attends external training annually which is appropriate to their role as the senior individual who leads on the School's data protection compliance.

4.5 Other teams and departments are given data protection training which is specific to their role or function as follows: ICT, administration.

5. Policies and Guidance

5.1 All staff at the School are required to comply with the following documents:

5.1.1 Data Protection Policy: Practical Guidance for Staff;

5.1.2 Information Security Policy; and

5.1.3 Guidance for Staff on the Use of Photographs and Videos of Pupils.

5.2 The Head and SLT are responsible for implementing the:

5.2.1 Data Breach Policy and Procedure;

5.2.2 Information and Records Retention Policy;

5.2.3 CCTV Policy; and

5.2.4 Appropriate Policy Document for special category personal data.

6. Documentation

6.1 Documenting how we comply with data protection law is a key part of our compliance. In addition to the documents listed at section 5 above we

6.1.1 maintain a record of how we use personal data as required under Article 30 of the GDPR. The Head is responsible for maintaining this record;

6.1.2 document our lawful bases for using personal data through our privacy notices;

6.1.3 keep a record of our legitimate interests assessments;

6.1.4 carry out risk assessments and when required a data protection impact assessment;

6.1.5 maintain a register of any data breaches. The Head is responsible for completing this. All staff understand that they must inform the Head of any suspected breach so that the register can be kept up to date;

6.1.6 record when staff complete data protection training to ensure that all staff have received the appropriate level of training; and Data Protection Policy, Page 3

6.1.7 maintain an appropriate policy document regarding our processing of special category personal data and criminal offence data as required by the DPA 2018.

7. Privacy Notice

7.1 The School has provided a privacy notice to the individuals whose personal data we process. The privacy notice is published on the School's website.

7.2 In addition, the School explains how personal data will be used on a case by case basis as appropriate. For example, forms that are used to collect personal data will include a brief description of how and why it will be used, and cross refer to the applicable privacy notice.

8. Data Protection by Design and Default

8.1 The School has built the data protection principles into its practices by implementing appropriate technical and organisation measures. This is known as data protection by design.

8.2 We also ensure that we only use the minimum amount of personal data to achieve our purposes - known as data protection by default.

8.3 More specifically we do the following:

8.3.1 at the start of any new project, or new activity, which involves using personal data (e.g. working with a new external activity provider, implementing new software or hardware) the Head considers how we will comply with the data protection principles;

8.3.2 we make it clear on any data collection forms what personal data must be provided and what is optional;

8.3.3 we proactively consider data protection risks and adopt appropriate measures to protect personal data e.g. encryption, physical security;
8.3.4 our external facing documents (e.g. privacy notices) are accessible and age appropriate.

8.3.5 before we share personal data externally we check that we have a lawful basis and that the sharing is fair;

8.3.6 we regularly review the measures which are in place to ensure that they are still appropriate;

8.3.7 we have developed a culture where staff understand the importance of data protection; and

8.3.8 if something has not gone right, or if there has been a "near miss", then we will look at what has happened to improve our practices, for example, by providing additional staff training and awareness.

8.3.9We recognise the need to report any safeguarding concerns to external agencies if they meet the threshold, Data Protection Policy Page 4.

8.4 The School has various internal written procedures in place to comply with our obligations under the GDPR. This includes in relation to:

8.4.1 computer and network security;

8.4.2 individuals exercising their rights;

8.4.3 ensuring that we only use processors who comply with the GDPR;

8.5 The Head determines whether a Data Protection Impact Assessment is required before the School begins any new type of processing activity. For example, before the School introduces new software to store pupil records. These assessments will be safely stored and securely maintained.

9. Individuals' Rights

9.1 We are committed to allowing individuals to exercise their rights under the GDPR. These rights are as follows:

9.1.1 right of access (i.e. making a subject access request);

9.1.2 right to rectification

9.1.3 right to erasure;

9.1.4 right to restriction;

9.1.5 right to data portability; and

9.1.6 right to object.

9.2 Staff are trained to recognise when an individual is exercising a right under the GDPR and to pass this immediately to the Head.

9.3 The School keeps a log of all requests to exercise rights with the applicable deadline for our response. This log is maintained by the Head.

9.4 To ensure that we meet our obligations the Head co-ordinates our response to all requests. The Head has detailed knowledge of how to respond to individuals' rights and has received external training. The Head will involve other members of staff, as appropriate, in formulating the School's response.

9.5 Consideration is given to at least the following issues when responding to rights:

9.6 the importance of responding within the statutory timeframe, usually one calendar month;

9.6.1 whether a pupil's consent should be sought before responding to their parent;

9.6.2 whether further engagement with the requester is needed, e.g. to ask for ID or to seek clarification of their request;

9.6.3 the exemptions under the Data Protection Act 2018; Data Protection Policy, Page 5

9.6.4 the provision of supplementary information (e.g. sources and purposes) under a subject access request;

9.6.5 whether the request can be refused, or a reasonable fee charged, because it is manifestly unfounded or excessive; and

9.6.6 how to securely send our response to the requester.

10. Information Security

10.1 The School has put in place technical and organisational measures to ensure the confidentiality, availability and integrity of personal data. The Head is responsible for determining the appropriate organisational measures, for example, staff training and guidance. The ICT manager leads on the technical side of our information security, for example, network security.

10.2 The School has implemented an Information Security Policy for staff.
10.3 We appreciate that prompt action is vital when handling information security incidents. Staff are trained to report any suspicions or concerns regarding potential personal data breaches to the Head immediately.

10.4 The Head will carry out an initial investigation and determine if the incident constitutes a personal data breach. If so, the procedure outlined in the Data Breach Policy and Procedure will be followed.

11. Processors

11.1 The School has procedures in place to check that the organisations acting as our processors are complying with the GDPR. The Head and IT manager are responsible for implementing these procedures.

11.2 The School has contracts in place with our processors which include the specific terms required by the GDPR. Legal advice is sought as required regarding these contracts.

11.3 Staff are trained to speak to the Head if they need to share information with an organisation which may act as the School's processor so that the Head can check that the appropriate measures are in place.

12. International Transfers

12.1 The School maintains a record of when it transfers personal data outside of the UK and what safeguard or derogation is relied on under the GDPR. The Head is responsible for maintaining this record which is held by HMPA.

13. Data Protection Fee

13.1 The School has procedures in place to ensure that the data protection fee is paid to the Information Commissioner's Office for all controllers.

13.2 The Head is responsible for ensuring the fee is paid on time. Data Protection Policy Page 6

14. Monitoring and Review

14.1 The Head will ensure that the content and implementation of the procedures set out in this policy are reviewed regularly. Any personal data breaches at the School will be followed by a review of the relevant procedures by the Head and a report made to Governance.