



HOMEBROOK WOODS

Independent Special School

Ages 5–11 | Autism Spectrum Condition (ASC), Speech, Language and Communication Needs (SLCN) and Associated SEND

DATA PROTECTION POLICY

**UK GDPR
Data Protection Act 2018**

Document Control

Policy Title	Data Protection Policy
Provision	Homebrook Woods
Policy Owner	Proprietor / Headteacher
Approved by	Proprietor
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Related Policies

- Privacy Notice
- Data Retention Schedule
- Safeguarding and Child Protection Policy
- Online Safety Policy
- Staff Code of Conduct
- Confidentiality Policy (if adopted)
- Acceptable Use Agreements

PURPOSE

Homebrook Woods outlines our commitment to the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

SCOPE

This policy applies to the personal data of job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. These are referred to in this policy as relevant individuals. This policy does not form part of any employee's contract of employment and Homebrook Woods may amend it at any time.

POLICY

GENERAL TERMS

“Personal data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier. It can also include pseudonymised data.

“Special categories of personal data” is data which relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

“Criminal offence data” is data which relates to an individual's criminal convictions and offences.

“Data processing” is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

TYPES OF DATA HELD

Personal data is kept in personnel files or within our HR systems. The following types of data may be held by Homebrook Woods, as appropriate, on relevant individuals:

- a) Name, address, phone numbers - for individual and next of kin
- b) CVs and other information gathered during recruitment
- c) References from former employers
- d) National Insurance numbers
- e) Job title, job descriptions and pay grades
- f) Conduct issues such as letters of concern, disciplinary proceedings
- g) Holiday records
- h) Internal performance information
- i) Medical or health information
- j) Sickness absence records
- k) Tax codes
- l) Terms and conditions of employment
- m) Training details

Relevant individuals should refer to our Privacy Notice for more information on the reasons for its processing activities, the lawful bases it relies on for the processing and data retention periods.

DATA PROTECTION PRINCIPLES

All personal data obtained and held by Homebrook Woods will:

- a) Be processed fairly, lawfully and in a transparent manner
- b) Be collected for specific, explicit, and legitimate purposes
- c) Be adequate, relevant and limited to what is necessary for the purposes of

processing

- d) Be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay
- e) Not be kept for longer than is necessary for its given purpose
- f) Be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) Comply with the relevant data protection procedures for international transferring of personal data

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- h) The right to be informed
- i) The right of access
- j) The right for any inaccuracies to be corrected (rectification)
- k) The right to have information deleted (erasure)
- l) The right to restrict the processing of the data
- m) The right to portability
- n) The right to object to the inclusion of any information
- o) The right to regulate any automated decision-making and profiling of personal data

PROCEDURES

Homebrook Woods has taken the following steps to protect the personal data of relevant individuals, which it holds or to which it has access:

- a) It appoints or employs employees with specific responsibilities for:
 - o the processing and controlling of data

- the comprehensive reviewing and auditing of its data protection systems and procedures
- overviewing the effectiveness and integrity of all the data that must be protected

There are clear lines of responsibility and accountability for these different roles.

- b) It provides information to its employees on their data protection rights, how it uses their personal data, and how it protects it. The information includes the actions relevant individuals can take if they think that their data has been compromised in any way
- c) It provides its employees with information and training to make them aware of the importance of protecting personal data, to teach them how to do this, and to understand how to treat information confidentially
- d) It can account for all personal data it holds, where it comes from, who it is shared with and also who it might be shared with
- e) It carries out risk assessments as part of its reviewing activities to identify any vulnerabilities in its personal data handling and processing, and to take measures to reduce the risks of mishandling and potential breaches of data security. The procedure includes an assessment of the impact of both use and potential misuse of personal data in and by Homebrook Woods
- f) It recognises the importance of seeking individuals' consent for obtaining, recording, using, sharing, storing and retaining their personal data, and regularly reviews its procedures for doing so, including the audit trails that are needed and are followed for all consent decisions. Homebrook Woods understands that consent must be freely given, specific, informed and unambiguous. Homebrook Woods will seek consent on a specific and individual basis where appropriate. Full information will be given regarding the activities about which consent is sought. Relevant individuals have the absolute and unimpeded right to withdraw that consent at any time

- g) It has the appropriate mechanisms for detecting, reporting and investigating suspected or actual personal data breaches, including security breaches. It is aware of its duty to report significant breaches that cause significant harm to the affected individuals to the Information Commissioner, and is aware of the possible consequences
- h) It is aware of the implications international transfer of personal data internationally

ACCESS TO DATA

Relevant individuals have a right to be informed whether we process personal data relating to them and to access the data that we hold about them. Requests for access to this data will be dealt with under the following summary guidelines:

- a) A subject access request must be made in writing to the Data Protection Officer.
- b) We will not charge for the supply of data unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request
- c) We will respond to a request without delay. Access to data will be provided, subject to legally permitted exemptions, within one month as a maximum. This may be extended by a further two months where requests are complex or numerous

Relevant individuals must inform Homebrook Woods immediately if they believe that the data is inaccurate, either as a result of a subject access request or otherwise. We will take immediate steps to rectify the information.

DATA DISCLOSURES

Homebrook Woods may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- a) Any employee benefits operated by third parties
- b) Disabled individuals - whether any reasonable adjustments are required to assist them at work

- c) Individuals' health data - to comply with health and safety or occupational health obligations towards the employee
- d) For Statutory Sick Pay purposes
- e) HR management and administration - to consider how an individual's health affects his or her ability to do their job
- f) The smooth operation of any employee insurance policies or pension plans

These kinds of disclosures will only be made when strictly necessary for the purpose.

DATA SECURITY

Homebrook Woods adopts procedures designed to maintain the security of data when it is stored and transported. In addition, employees must:

- a) Ensure that all files or written information of a confidential nature are stored in a secure manner and are only accessed by people who have a need and a right to access them
- b) Ensure that all files or written information of a confidential nature are not left where they can be read by unauthorised people
- c) Refrain from sending emails containing sensitive work-related information to their personal email address
- d) Check regularly on the accuracy of data being entered into computers
- e) Always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them
- f) Use computer screen blanking to ensure that personal data is not left on screen when not in use

Personal data relating to employees should not be kept or transported on laptops, USB sticks, or similar devices, unless authorised by a responsible person. Where personal data is recorded on any such device it should be protected by:

- a) Ensuring that data is recorded on such devices only where absolutely necessary

- b) Using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted
- c) Ensuring that laptops or USB drives are not left lying around where they can be stolen

Failure to follow our rules on data security may be dealt with via Homebrook Woods's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

INTERNATIONAL DATA TRANSFERS

Homebrook Woods seeks to ensure that personal information is stored and processed within the United Kingdom wherever possible.

Where personal information is processed or stored outside the UK, Homebrook Woods will ensure that appropriate safeguards are in place in accordance with UK GDPR. This may include the use of adequacy regulations, the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or other legally recognised safeguards.

Any international transfer of personal data will be subject to an appropriate assessment of risk and ongoing oversight to ensure that personal information remains secure and protected.

BREACH NOTIFICATION

Suspected breaches are reported immediately to the DPO. The DPO assesses risk and, where legally required, notifies the ICO within 72 hours and affected individuals without undue delay. A breach log is maintained.

All actual or suspected personal data breaches will be reviewed by the Proprietor / Headteacher to identify lessons learned and strengthen information security arrangements.

Where a data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to The Information Commissioner within 72 hours of Homebrook Woods becoming aware of it and may be reported in more than one instalment.

Individuals will be informed directly in the event that the breach is likely to result in a high risk to the rights and freedoms of that individual.

If the breach is sufficient to warrant notification to the public, we will do so without undue delay.

TRAINING

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

Refresher training will be provided regularly, and whenever there are significant changes to legislation, technology or Homebrook Woods' information governance arrangements.

The nominated data controller/auditors/protection officers for Homebrook Woods are trained appropriately in their roles under data protection legislation.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and Homebrook Woods of any potential lapses and breaches of Homebrook Woods's policies and procedures.

RECORDS

Homebrook Woods keeps records of its processing activities including the purpose for the processing and retention periods in its HR data record. These records will be kept up to date so that they reflect current processing activities.

RETENTION

We apply a retention schedule aligned to sector guidance; lawful bases are identified for each processing activity; subject rights (access, rectification, erasure, restriction, objection, portability) are facilitated within statutory timescales.

AI & EMERGING TECHNOLOGIES

Homebrook Woods recognises that artificial intelligence (AI) and emerging technologies present both opportunities and risks.

Any use of AI will be lawful, transparent, proportionate and subject to appropriate human oversight.

Staff must not upload confidential, safeguarding or identifiable personal information relating to pupils, families or colleagues into publicly available AI systems unless this has been specifically authorised and appropriate safeguards are in place.

The use of AI systems will be reviewed regularly to ensure continued compliance with UK GDPR, the Data Protection Act 2018 and the school's safeguarding responsibilities.

DATA PROTECTION OFFICER

Homebrook Woods has appointed a suitably qualified external Data Protection Officer (DPO) to provide independent advice and support regarding compliance with UK GDPR and the Data Protection Act 2018.

Contact details for the appointed DPO will be provided to staff, parents, carers and other stakeholders and published within the Homebrook Woods Privacy Notice once the appointment has been confirmed prior to opening.

General enquiries regarding data protection should be directed to:

Proprietor / Headteacher

Homebrook Woods

Email: vonny@homebrookwoods.co.uk

Telephone: **07706 473040**

THIRD PARTIES

Homebrook Woods may at any time engage with a third party for support and expertise regarding actions relating to this policy.

POLICY CONTEXT

This policy relates to the following legislative requirements, standards and internal documents:

Standards	• Data Protection Act 2018 • UK General Data Protection Regulation (UK GDPR) • Digital Economy Act 2017 • Freedom of Information Act 2000 • Environmental Information Regulations 2004 • Human Rights Act 1998 • Statistics and Registration Services Act 2007
Related Forms & Documents	• Contract of Employment • Disciplinary Policy • Privacy Notice

VERSION CONTROL

Version	Date	Change Summary	Author/Reviewer	Approved by
1.0	September 2025	Initial policy	Mark Wrangles	—
2.0	August 2026	Reviewed, updated and adapted for Homebrook Woods. Updated for UK GDPR, Data Protection Act 2018, KCSIE 2026 and Homebrook Woods governance arrangements.	Vonny Shelley	Proprietor