



EMERGE SCHOOL

Data Protection Policy

2025 - 2026

☀️ Our Vision: *A culture rooted in safety, where people feel seen, heard, included, and connected through authentic relationships.*

🎯 Our Mission: *To create a safe and nurturing environment where everyone feels a sense of belonging, is empowered in their growth and learning, and is encouraged to embrace who they are and who they aspire to become.*

💖 Our Values: *At Emerge School, our values are the foundation of who we are, how we work, and what we believe in. They shape how we support young people and how we support each other.*

We are proud to uphold these four core values:



Voice: *empowering every voice to speak, shape and be heard*



Connection: *rooted in relationships, thriving through authenticity*



Growth: *evolving with purpose, innovating with heart*



Inclusion: *where every story begins, and every person matters*

Excel & Emerge Care was created to give children and young people with complex needs a safe, supportive place to grow and heal. Through residential care, education, and therapeutic support, we build stability, trust, and a future where children and young people can truly flourish.

CONTENTS

1. Aims	- 3 -
2. Legislation and Guidance	- 3 -
3. Definitions	- 3 -
4. The Data Controller	- 4 -
5. Roles and Responsibilities	- 4 -
6. Data Protection Principles	- 5 -
7. Collecting Personal Data	- 5 -
8. Sharing Personal Data	- 7 -
9. Privacy/ Fair Processing Notice	- 8 -
10. Subject Access Requests and Other Rights of Individuals	- 9 -
11. Parental Requests to See the Educational Record	- 11 -
12. Photographs and Videos	- 11 -
13. CCTV	- 12 -
14. Data Security and Storage of Records	- 12 -
15. Disposal of Records	- 13 -
16. Personal Data Breaches	- 13 -
17. Data Protection by Design and Default	- 13 -
18. Training	- 14 -
19. Monitoring	- 14 -
20. Appendices	- 15 -

1. AIMS

Emerge School aims to ensure that all personal data collected about staff, pupils, parents/ carers, directors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill.

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. LEGISLATION AND GUIDANCE

This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018.

It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests. It also reflects the ICO's code of practice for the use of surveillance cameras and personal information.

3. DEFINITIONS

Term	Definition
Personal Data	<p>Any information relating to an identified, or identifiable, individual. This may include the individual's:</p> <ul style="list-style-type: none">• Name (including initials)• Identification number• Location data• Online identifier, such as a username <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>
Special categories of personal data	<p>Personal data, which is more sensitive and so needs more protection, including information about an individual's:</p> <ul style="list-style-type: none">• Racial or ethnic origin• Political opinions• Religious or philosophical beliefs• Trade union membership• Genetics• Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes• Health – physical or mental• Sex life or sexual orientation
Processing	<p>Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.</p> <p>Processing can be automated or manual.</p>

Data subject	The identified or identifiable individual whose personal data is held or processed.
Data controller	A person or organisation that determines the purposes and the means of processing personal data.
Data processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
Personal data breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

4. THE DATA CONTROLLER

Our school processes personal data relating to parents/ carers, pupils, staff members, directors, visitors and others, and therefore is a data controller. The school is registered with the ICO and has paid its data protection fee to the ICO, as legally required.

5. ROLES AND RESPONSIBILITIES

This policy applies to all staff employed by the school, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

The Board of Directors

The Board of Directors has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

Data Protection Officer

The Data Protection Officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable. They will report to the Board of Directors on their activities directly and where relevant report to the board their advice and recommendations on school data protection issues.

The DPO is also the first point of contact for individuals whose data the school processes, and for the ICO.

Headteacher

The Headteacher acts as the representative of the data controller on a day-to-day basis.

All Staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy.
- Informing the school of any changes to their personal data, such as change of address, change of name.
- Contacting the DPO in the following circumstances
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure.
 - If they have any concerns that this policy is not being followed.
 - If they are unsure whether they have a lawful basis to use personal data in a particular way.
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area.
 - If there is a data breach.
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals.
 - If they need help with any contracts or sharing personal data with third parties.

6. DATA PROTECTION PRINCIPLES

The GDPR is based on data protection principles that our school must comply with.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary for the purposes for which it is processed.
- Processed in a way that ensures it is appropriately secure.

This policy sets out how the school aims to comply with these principles.

7. COLLECTING PERSONAL DATA

Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked the school to take specific steps before entering into a contract.
- The data needs to be processed so that the school can **comply with a legal obligation**.
- The data needs to be processed to ensure the **vital interests** of the individual or another person i.e. to protect someone's life.

- The data needs to be processed so that the school can **perform a task in the public interest or exercise its official authority**.
- The data needs to be processed for the **legitimate interests** of the school or a third party, provided the individual's rights and freedoms are not overridden.
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**.

For special categories of personal data, we will also meet one of the special category conditions for processing under data protection law:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given **explicit consent**.
- The data needs to be processed to perform or exercise obligations or rights in relation to **employment, social security or social protection law**.
- The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent.
- The data has already been made **manifestly public** by the individual.
- The data needs to be processed for the establishment, exercise or defence of **legal claims**.
- The data needs to be processed for reasons of **substantial public interest** as defined in legislation.
- The data needs to be processed for **health or social care purposes**, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- The data needs to be processed for **public health reasons**, and the processing is done by, or under the direction of, a health professional or by any other person obliged to under confidentiality law.
- The data needs to be processed for **archiving purposes**, scientific or historical research purposes, or statistical purposes, and the processing is in the public interest.

For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given **consent**.
- The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent.
- The data has already been made **manifestly public** by the individual.
- The data needs to be processed for or in connection with legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of **legal rights**.
- The data needs to be processed for reasons of **substantial public interest** as defined in legislation.

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by Data Protection Law.

We will always consider the fairness of our data processing. We will ensure we do not handle personal data in ways that individuals would not reasonably expect or use personal data in ways which have unjustified adverse effects on them.

Limitation, minimisation and accuracy

We will only collect personal data for specified explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so and seek consent where necessary.

Staff must only process personal data where it is necessary to do their jobs.

We will keep data accurate and, where necessary, up to date. Inaccurate data will be rectified or erased when appropriate.

In addition, when staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the Information and Records Management Society's toolkit for schools.

8. SHARING PERSONAL DATA

We will not normally share personal data with anyone else, but there are certain circumstances where we may be required to do so. These include, but are not limited to, situations where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff or pupils at risk.
- We need to liaise with other agencies – we will seek consent as necessary before doing this
- We need to liaise with other educational institutions.
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will
 - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with Data Protection law.
 - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share.
 - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us.

We will also share personal data with law enforcement and government bodies where we are legally required to do so.

We may also share personal data with emergency services and local authorities to help them to respond to an emergency that affects any of our pupils or staff.

Where we transfer personal data internationally, we will do so in accordance with data protection law.

9. PRIVACY/ FAIR PROCESSING NOTICE

Pupils and parents/carers

We hold personal data about pupils to support teaching and learning, to provide pastoral care and to assess how the school is performing. We may also receive data about pupils from other

organisations including, but not limited to, other schools, local authorities and the Department for Education.

This data includes, but is not restricted to:

- Contact details.
- Results of internal assessment and externally set tests.
- Data on pupil characteristics, such as ethnic group or special education needs.
- Exclusion information.
- Details of any medical conditions.

We only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about pupils with anyone without consent unless the law and our policies allow us to do so.

We are required, by law, to pass certain information about pupils to specified external bodies, such as our local authority, the Department for Education, Education Skills Funding Agency, so that they are able to meet their statutory obligations.

Staff

We process data relating to those we employ to work, or otherwise engage to work at, our school. The purpose of processing this data is to assist in the running of the school, including to:

- Enable individuals to be paid.
- Facilitate safe recruitment.
- Support the effective performance management of staff.
- Improve the management of workforce data across the sector.
- Inform our recruitment and retention policies.
- Allow better financial modelling and planning.
- Enable ethnicity and disability monitoring.

Staff personal data includes, but is not limited to, information such as:

- Contact details.
- National Insurance numbers.
- Dates of birth.
- Salary information.
- Qualifications.
- Absence data.
- Personal characteristics, including ethnic groups.
- Medical information.
- Outcomes of any disciplinary procedures.

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about staff with third parties without consent unless the law allows us to.

We are required, by law, to pass certain information about staff to specified external bodies, such as our local authority, the Department for Education and the Education Skills Funding Agency, so that they are able to meet their statutory obligations.

10. SUBJECT ACCESS REQUESTS AND OTHER RIGHTS OF INDIVIDUALS

Subject Access Requests

Individuals have a right to make a 'subject access request' to gain access to personal information. This includes:

- Confirmation that their personal data is being processed.
- Access to a copy of the data.
- The purposes of the data processing.
- The categories of personal data concerned.
- Who the data has been, or will be, shared with.
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period.
- The source of the data, if not the individual.
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual.
- The safeguards provided if the data is being transferred internationally.

Subject Access requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing using Appendix 3 and returned to the Data Protection Officer. It should include:

- Name of individual.
- Correspondence address.
- Contact number and email address.
- Details of the information requested.

If staff receive a subject access request, they must immediately forward it to the DPO.

You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR, and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

Children and subject access requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request or have given their consent. Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

Responding to subject access requests

When responding to requests we:

- May ask the individual to provide 2 forms of identification.
- May contact the individual via phone to confirm the request was made.
- Will respond without delay and within 1 month of receipt of the request (or receipt of the additional information needed to confirm identity, where relevant)
- Will provide the information free of charge.
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous.

We will inform the individual of this within 1 month, and explain why the extension is necessary

We may not disclose information for a variety of reasons, such as if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual.
- Would reveal that the child is being or has been abused, or is at risk of abuse, where the disclosure of that information would not be in the child's best interests.
- Would include another person's personal data that we can't reasonably anonymise, and we don't have the other person's consent and it would be unreasonable to proceed without it.
- Is part of certain sensitive documents, such as those related to crime, immigration, legal proceedings or legal professional privilege, management forecasts, negotiations, confidential references, or exam scripts.

If the request is unfounded or excessive, we may refuse to act on it or charge a reasonable fee to cover administrative costs. We will consider whether the request is repetitive in nature when making this decision.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO or they can seek to enforce their subject access right through the courts.

Other data protection rights of the individual

In addition to the right to the above, individuals also have the right to:

- Withdraw their consent to processing at any time.
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing.
- Challenge processing which has been justified on the basis of public interest.
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them)
- Prevent processing that is likely to cause damage or distress.
- Be notified of a data breach in certain circumstances.
- Make a complaint to the ICO.
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

11. PARENTAL REQUESTS TO SEE THE EDUCATIONAL RECORD

Parents of pupils at this school do not have an automatic right to access their child's educational record. The school will decide on a case-by-case basis whether to grant such requests, and we will bear in mind guidance issued from time to time from the Information Commissioner's Office (the organisation that upholds information rights). Subject access requests for all or part of the pupil's educational record will be provided within 15 school days if the subject access request has been successful.

When responding to requests, we:

- May ask the individual for further identification.
- May contact the individual via phone to confirm the request was made.

We will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual.
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests.
- Is contained in adoption or parental order records.
- Is given to a court in proceedings concerning the child.

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee, which considers administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive or asks for further copies of the same information.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

12. PHOTOGRAPHS AND VIDEOS

As part of our school activities, we may take photographs and record images of individuals within our school. We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Any photographs and videos taken by parents/carers at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos are not shared publicly on social media for safeguarding reasons, unless all the relevant parents/carers have agreed to this.

Uses may include:

- Within the school on notice boards and in school brochures, magazines and newsletters.
- Online on our school website or social media pages.

- Outside of the school by external agencies such as the school photographer, newspapers, campaigns.

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

13. CCTV

We use CCTV externally to ensure that the school remains safe. We will adhere to the ICO's code of practice. For further information on how and where we use CCTV please see our CCTV policy available on the website.

14. DATA SECURITY AND STORAGE OF RECORDS

Paper based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept secure.

Papers containing confidential personal information should not be left on office and classroom desks, on staff room tables or pinned to noticeboards where there is general access.

Staff when using electronic devices that contain personal information will lock their devices if left unattended for any length of time.

Where personal information is taken off site (in paper or electronic form), staff must ensure it is kept securely and following GDPR requirements.

Encryption software is used to protect all portable devices including laptops.

Staff are not to use USB devices for school-based work.

Staff and Governing bodies who store personal information on their personal devices are expected to follow the same security procedures for school-owned equipment.

Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected.

15. DISPOSAL OF RECORDS

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it. For example, we will shred paper-based records and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the school's behalf. If

we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

16. PERSONAL DATA BREACHES

The school will make all reasonable endeavours to ensure that there are no personal data breaches. In the unlikely event of a suspected data breach, we will follow the procedure set out in Appendix 1. When appropriate, we will report the data breach to the ICO within 72 hours. Such breaches in a Trust context may include, but are not limited to:

- A non-anonymised dataset being published on the school website which shows the exam results of pupils eligible for the pupil premium.
- Safeguarding information being made available to an unauthorised person.
- The theft of a school laptop containing non-encrypted personal data about pupils.

17. DATA PROTECTION BY DESIGN AND DEFAULT

We will put measures in place to show that we have integrated data protection into all our data processing activities, including:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge.
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6)
- Completing data protection impact assessments where the school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process)
- Integrating data protection into internal documents including this policy, any related policies and privacy notices.
- Regularly training members of staff on Data Protection law, this policy, any related policies and any other data protection matter; we will also keep a record of attendance
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
- Appropriate safeguards being put in place if we transfer any personal data outside of the European Economic Area (EEA), where different data protection laws will apply
- Maintaining records of our processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of our School and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)
 - For all personal data that we hold, maintaining an internal record of the type of data, type of data subject, how and why we are using the data, any third-party recipients, any transfers outside of the EEA and the safeguards for those, retention periods and how we are keeping the data secure

18. TRAINING

All staff are provided with data protection training as part of their induction process. Data Protection will also form part of the continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

19. MONITORING

The DPO is responsible for monitoring and reviewing this policy.

20. APPENDICES

Appendix 1: Personal data breach procedure

This procedure is based on guidance on personal data breaches produced by the ICO

- On finding or causing a breach, or potential breach relating to the school, the staff member, director or data processor must immediately notify the DPO by emailing Emerge Care HR hr@emergecare.co.uk
- The DPO will investigate the report and determine whether a breach has occurred. To decide, the DPO will consider whether personal data has been accidentally or unlawfully:
 - Lost
 - Stolen
 - Destroyed
 - Altered
 - Disclosed or made available where it should not have been
 - Made available to unauthorised people
- Staff and Directors will cooperate with the investigation (including allowing access to information and responding to questions). The investigation will not be treated as a disciplinary investigation.
- The DPO will alert the Headteacher and the Responsible Individual in the first instance
- The DPO will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary.
- The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The DPO will work out whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the DPO will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (eg emotional distress) including through:
 - Loss of control over their data
 - Discrimination
 - Identify theft or fraud
 - Financial loss
 - Unauthorised reversal of pseudonymisation (for example key-coding)
 - Damage to reputation
 - Loss of confidentiality
 - Any other significant economic or social disadvantage to the individual(s) concerned

If it's likely that there will be a risk to people's rights and freedoms, the DPO must notify the ICO

- The DPO will document the decision (either way), in case it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored on the school's secure document store.
- Where the ICO must be notified, the DPO will do this via the [https://ico.org.uk/for- 'report a breach'](https://ico.org.uk/for-report-a-breach) page of the ICO website within 72 hours. As required, the DPO will set out:
 - A description of the nature of the personal data breach including, where possible;
 - The categories and approximate number of individuals concerned.
 - The categories and approximate number of personal data records concerned.
 - The name and contact details of the DPO.

- o A description of the likely consequences of the personal data breach.
- o A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned.
- o If all the above details are not yet known, the DPO will report as much as they can within 72 hours of the school's awareness of the breach. The report will explain that there is a delay, the reasons why, and when the DPO expects to have further information. The DPO will submit the remaining information as soon as possible
- Where the school is required to communicate with individuals whose personal data has been breached, the DPO will tell them in writing. This notification will set out:
 - A description, in clear and plain language, of the nature of the personal data breach
 - The name and contact details of the DPO
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
- The DPO will consider, in light of the investigation and any engagement with affected individuals, whether to notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
- The DPO will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
 - Facts and cause
 - Effects
 - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored within the school's secure data storage.

The DPO and Headteacher will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible.

The DPO will monitor trends or patterns and will contact the Headteacher immediately if identified' to reduce risks of future breaches.

Actions to minimise the impact of data breaches

We set out below the steps we might take to try and mitigate the impact of different types of data breach if they were to occur, focusing especially on breaches involving particularly risky or sensitive information. We will review the effectiveness of these actions and amend them as necessary after any data breach.

Sensitive information being disclosed via email (including safeguarding records)

- If special category data (sensitive information) is accidentally made available via email to unauthorised individuals, the sender must attempt to recall the email as soon as they become aware of the error.
- Members of staff who receive personal data sent in error must alert the sender and the DPO as soon as they become aware of the error.

- If the sender is unavailable or cannot recall the email for any reason, the DPO will ask the external IT support provider following discussion with the Head Teacher to attempt to recall it from external recipients and remove it from the school's email system (retaining a copy if required as evidence)
- In any cases where the recall is unsuccessful or cannot be confirmed as successful, the DPO will consider whether it's appropriate to contact the relevant unauthorised individuals who received the email, explain that the information was sent in error, and request that those individuals delete the information and do not share, publish, save or replicate it in any way.
- The DPO will endeavour to obtain a written response from all the individuals who received the data, confirming that they have complied with this request.
- The DPO will carry out an internet search to check that the information has not been made public; if it has, we will contact the publisher/website owner or administrator to request that the information is removed from their website and deleted.
- If safeguarding information is compromised, the DPO will inform the Designated Safeguarding Lead and discuss whether the school should inform any, or all, of its local safeguarding partners.

APPENDIX 2 – Privacy Notice

Privacy notice for parents/carers.

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about pupils. We, Emerge School, are the ‘data controller’ for the purposes of Data Protection law. For the most up to date copies of our Privacy Notices, please visit the school website.

Privacy notice for staff

Under Data Protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school. We, Emerge School are the ‘data controller’ for the purposes of data protection law. For the most up to date copies of our Privacy Notices, please visit the school website.

Appendix 3 – SAR Letter

[Insert date] [Insert your name and address]

Re: **Subject Access Request**

Dear [Insert the name of your Data Protection Officer],

Please provide me with the information about me that I am entitled to under the General Data Protection Regulation. This is so I can be aware of the information you are processing about me and verify the lawfulness of the processing.

Here is the necessary information:

Name:	
Relationship with the school	Please select: Pupil / parent / carer/ employee / volunteer Other (please specify):
Correspondence address	
Contact number	
Email address	
Details of the information requested	Please provide me with: <i>[Insert details of the information you want that will help us to locate the specific information. Please be as precise as possible]</i>

If you need any more information from me, please let me know as soon as possible.

Please bear in mind that under the GDPR you cannot charge a fee to provide this information, and in most cases, you must supply me with the information within 1 month.

Yours sincerely,

Name

Review Date	February 2025
Reviewed By	Danielle Clowes & Andy Gould
Next Review	February 2027
Summary of Changes	First Edition February 2025- Deputy Headteachers information updated. September 2025 – Headteacher details updated January 2026 – Approved by Headteacher- Sarah Mason

Approved by:



Headteacher:

Date:06.01.2026