



THE FEDERATION OF
HAZEL WOOD INFANT SCHOOL AND LYDLYNCH INFANT SCHOOL

DATA PROTECTION POLICY
2026-2028

1. Introduction and Purpose

The Federation of Hazel Wood Infant School and Lydlynch Infant School (hereafter "the Federation") collects, stores, and processes personal data relating to pupils, parents, staff, governors, and visitors.

As a Data Controller registered with the [Information Commissioner's Office \(ICO\)](#), the Federation is legally mandated to protect this information. This policy ensures strict alignment with the UK GDPR, the Data Protection Act 2018, the Data Use and Access Act (DUAA) 2025, and operational directives from Hampshire Legal Services.

2. Core Data Protection Principles

All personal data processed across both campuses must be handled in strict accordance with the core principles of data protection. Data must be:

1. Lawful, Fair, and Transparent: Processed only where a valid legal basis exists.
2. Purpose Limitation: Collected for specified, explicit, and legitimate school operational needs.
3. Data Minimisation: Adequate, relevant, and strictly limited to what is necessary.
4. Accuracy: Kept up to date, with inaccurate data erased or rectified without delay.
5. Storage Limitation: Kept in a form that identifies individuals for no longer than necessary, adhering to the Hampshire County Council retention schedules.
6. Integrity and Confidentiality: Secured against unauthorised or unlawful processing, accidental loss, destruction, or damage.
7. Accountability: The Federation must be able to actively demonstrate compliance with all the above.

3. Roles and Responsibilities

3.1 Governing Body

- Ultimate strategic accountability for compliance lies with the Federation's Board of Governors.
- Ensures sufficient resources are allocated to support information security obligations.

3.2 Data Protection Officer (DPO)

- The Federation appoints an External DPO to monitor compliance, provide advice, and act as the primary contact for the ICO.
- The DPO will routinely attend Hampshire-specific updates and briefings to verify Federation frameworks remain current.

3.3 School Leadership (Headteachers & school Admin Officers)

- Mrs Hannah Simpson-Riggs (Headteacher, Hazel Wood) and Mrs Sophie Millington (Headteacher, Lydlynch), supported by the school Admin Officers, manage day-to-day implementation.
- Responsible for maintaining the Record of Processing Activities (ROPA) and coordinating emergency data incident response.

3.4 All Staff and the School Workforce

- Every staff member processing data must ensure they understand data protection regulations.
- Mandatory compliance training: All Federation personnel must complete the [Hampshire Services GDPR e-learning](#) module annually.

4. Lawful Bases for Processing Data

- Public Task: Necessary for the school to carry out its official educational and statutory functions.
- Legal Obligation: Necessary to comply with the law (e.g., safeguarding checks, reports to the DfE).
- Vital Interests: Necessary to protect someone's life in a medical emergency.
- Consent: Used when no other legal basis applies (e.g., specific marketing, optional non-educational apps).

5. Specific Operational Mandates (2026 Updates)

5.1 Multimedia Consent & CCTV

- Updated Guidelines: Photos and videos used on the websites, social media, or local displays require explicit, opt-in consent from parents or carers.
- Infant Focus: Because the Federation serves children aged 4 to 7, consent forms are strictly managed via parents/carers.
- CCTV operations are not used on either site.

5.2 Managing Data Protection Complaints

- Any data protection complaint or concern raised by a parent, staff member, or individual must be addressed using the specific June 2026 Hampshire Legal Services Data Complaints Framework.
- Simple operational queries should be directed to the respective school administrative offices:
 - Hazel Wood Admin: adminoffice@hazelwood-inf.hants.sch.uk
 - Lydlynch Admin: adminoffice@lydlynch.hants.sch.uk
- Formal escalated data disputes will be routed through the designated external DPO.

5.3 Freedom of Information (FOI) Requests

- All statutory FOI requests will be answered using the updated Hampshire FOI Response Templates to guarantee legal consistency, timeline management, and statutory precision.

6. Individual Rights

Individuals have the right to request access to their data via a Subject Access Request (SAR), alongside rights to rectification, erasure, restriction of processing, and data portability.

- SAR Timelines: The Federation will respond to valid SARs within one calendar month, irrespective of school holiday closures.
- Technical Defences: Data stored within internal networks, administrative databases (e.g., RM Integris), and learning tools (e.g., Tapestry) must be encrypted and password protected.
- Breach Reporting: Any suspected personal data breach must be reported immediately to the Headteacher or school Admin Officer .

- ICO Notification: If a data breach poses a risk to individuals' rights and freedoms, the Federation, via its DPO, will notify the ICO within 72 hours of discovery.

Review: July 2027