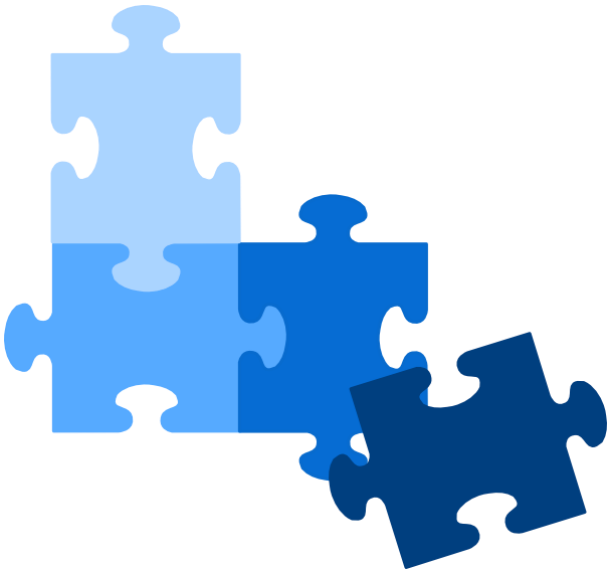
Data protection policy and privacy notice

JIGSAW LEARNING TRUST



Approved by:	Jigsaw Learning Trust Board	**Date:**	September 2025
Next review due	September 2027		

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1. Aims

Our school aims to ensure that all data collected about staff, pupils, parents, visitors, and volunteers is collected, stored, and processed in accordance with the Data Protection Act 2018, Data (Use and Access) Act 2025, and KCSIE 2026 guidance.

This policy applies to all data, whether in paper, electronic format, or processed through AI tools or online platforms.

2. Legislation and guidance

This policy meets the requirements of:

- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Data (Use and Access) Act 2025
- Keeping Children Safe in Education 2026

It also takes into account:

- ICO guidance and DfE model privacy notices
- Education (Pupil Information) (England) Regulations 2005
- DfE guidance on online safety and AI in education

3. Definitions

Term	Definition
Special Category data	Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified, including IP addresses.
Sensitive personal data	Data such as: racial or ethnic origin; political opinions; religious beliefs; trade union membership; physical and mental health; sexual orientation; criminal offences; biometric and genetic data.
Processing	Obtaining, recording, holding, or using data, including via AI or online platforms.
Data subject	The person whose personal data is held or processed.
Data controller	A person or organisation that determines the purposes for which, and the manner in which, personal data is processed.
Data processor	A person, other than an employee of the data controller, who processes the data on behalf of the data controller.
Generative AI tools	Software or services that autonomously generate content and may process personal or sensitive data. Risk assessments and safeguarding measures must be in place.

Term	Definition
Online Safety Risks	Risks including misinformation, disinformation, cyberbullying, exposure to harmful content, or unsafe AI-generated content.

4. The data controller

Our school processes personal information relating to pupils, staff, and volunteers/visitors, and is therefore a **data controller**. Responsibility is delegated to:

- **Miss S Wilson**, School Office Manager (Fulwell Infant Site)
- **Mrs Wendy Gill**, School Administrator (Ouston Primary Site)

Jigsaw Learning Trust is registered as a data controller with the ICO and renews this registration annually.

5. Data protection principles

Data shall be processed in line with the following principles:

- **Lawfully, fairly, and transparently**, with attention to safeguarding and online safety.
- Collected only for **specified, legitimate purposes**, including education, safeguarding, statutory obligations, and safe use of AI tools.
- **Adequate, relevant, and limited** to the purpose for which it is collected.
- **Accurate and up to date**; errors will be corrected without delay.
- **Kept no longer than necessary**, with secure disposal of outdated information.
- Protected with **appropriate technical and organisational measures**, including encryption, password protection, and AI risk mitigation.

6. Roles and responsibilities

- **Governing Board**: Ensures compliance with DPA 2018, KCSIE 2026, and AI/online safety measures.
- **Headteacher/Deputy**: Day-to-day oversight of data protection, AI tool usage, and online safety risks.
- **Staff**: Ensure personal data collection and storage comply with this policy; report any breaches.
- **Data Protection Officer (DPO)**:
    - Advise on GDPR, Data Protection Act, and KCSIE 2026 compliance
    - Monitor AI deployment and online safety measures
    - Conduct audits, risk assessments, and staff training

      Contact DPO:
      Data Protection Officer (for Schools)
      Sunderland City Council

City Hall, Plater Way, Sunderland SR1 3AA
Tel: 07769 672633 | Email: data.protection@sunderland.gov.uk

7. Privacy/fair processing notice

7.1 Pupils and Parents

See our website: Privacy Notice – Parents

7.2 Staff

We process staff data for purposes including payroll, safe recruitment, performance management, workforce monitoring, financial planning, and statutory reporting.

Additional Statement:
"The school may process personal data through AI-enabled learning tools. Risk assessments and online safety measures are applied to protect data subjects. All AI data processing follows GDPR, DPA 2018, and KCSIE 2026 guidance."

8. Data Subject Rights

Data subjects (pupils, parents, staff, volunteers) may:

- Request access to personal data, including AI-processed information
- Request correction or deletion of inaccurate data
- Restrict or object to certain processing
- Exercise rights under KCSIE 2026 and safeguarding provisions

Requests should be submitted in writing to the DPO. Certain information may be withheld if disclosure risks harm or compromises safeguarding.

9. Parental requests to see the educational record

Parents can access their child's educational record within **15 school days**, free of charge. Personal data belongs to the child; parental access requires consent from the child if they are able to understand their rights.

10. Storage of records

- Paper records and portable devices stored securely
- Personal information not left unattended
- Off-site data requires check-in/out procedures
- Passwords (8 characters with letters/numbers) and encryption used
- Personal devices storing school data must comply with school security protocols

11. Disposal of records

- Paper records: shredded/incinerated
- Electronic files: securely deleted or overwritten
- Third-party secure disposal may be used

12. Training

Staff, governors, and volunteers receive:

- Data protection, GDPR, and DPA 2018 induction training
- KCSIE 2025 and safeguarding updates
- Online safety and AI usage guidance
- Ongoing professional development for legislative or procedural changes

13. The General Data Protection Regulation

We adhere to GDPR principles, respecting rights of data subjects, including automated decision-making safeguards under KCSIE 2026.

14. Monitoring arrangements

- **Policy monitored by:** Mrs Wendy Angus
- **Compliance checks:** Mrs H Akien (termly)
- **Review cycle:** Every 2 years, shared with governing board

15. Links with other policies

- Freedom of Information Publication Scheme
- Safeguarding Policy
- Online Safety Policy
- AI Policy