Clybiau Llywodraethwyr a Chylch Chwarae
Gresffordd Gresford
Governors' Clubs and Playgroup

Data Protection & Confidentiality Policy

Equality Act Impact Assessment	YES	NO	Ionawr 2025
Last Review Date	May 2026		
Date to be reviewed	May 2027		
Date Adopted by Management Committee	10.06.2026		
Responsible Individual - Mr Richard Hatwood			
Chair of Management Committee – Mrs Jan MacDonald			

1. Purpose

The purpose of this policy is to ensure that GGCP complies with all relevant data protection laws, including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). GGCP is committed to protecting the privacy and confidentiality of personal information and managing data responsibly in line with legal requirements and best practices.

2. Scope

This policy applies to all GGCP trustees, staff, and volunteers who handle personal data, as well as any contractors or third parties with access to GGCP data. It covers all personal data held by GGCP, including data on children, parents, guardians, staff, volunteers, and other stakeholders.

3. Policy Statement

GGCP is committed to:
- Protecting personal data and ensuring that it is collected, used, and stored lawfully, fairly, and transparently.
- Ensuring that personal data is accurate, kept up-to-date, and retained only as long as necessary.
- Safeguarding the confidentiality of personal data and preventing unauthorized access, use, or disclosure.
- Providing clear information on data rights and responsibilities to staff, volunteers, parents, and other stakeholders.

4. Legal Basis for Processing Data

GGCP will only process personal data when there is a lawful basis to do so, which includes:
- Consent: Obtaining explicit consent from individuals to process their data.
- Contractual Obligation: Processing data as part of a contractual obligation with parents, staff, or other stakeholders.
- Legal Obligation: Complying with legal or regulatory requirements.
- Vital Interests: Protecting the safety or vital interests of individuals.
- Legitimate Interests: Processing data for legitimate interests that are necessary for the operation of GGCP and do not override individuals' rights.

5. Data Protection Principles

GGCP adheres to the following data protection principles as outlined in GDPR:

- Lawfulness, Fairness, and Transparency: Data is collected and processed lawfully, fairly, and transparently.
- Purpose Limitation: Data is collected for specified, explicit, and legitimate purposes.
- Data Minimization: Only data that is necessary for the purpose will be collected.
- Accuracy: GGCP will take steps to ensure data is accurate and up-to-date.
- Storage Limitation: Data is retained only for as long as necessary.
- Integrity and Confidentiality: Data is processed securely, with measures in place to protect against unauthorized access, loss, or destruction.

6. Collection and Use of Personal Data

GGCP collects personal data from children, parents, staff, and other stakeholders for various purposes, including:
- Managing enrolments, attendance, and emergency contact information for children.
- Recording staff and volunteer information for payroll, training, and safeguarding compliance.
- Communicating with parents, guardians, and other stakeholders.
- Meeting legal obligations, including health and safety, safeguarding, and CIW reporting requirements.

7. Confidentiality

7.1 Confidentiality of Personal Information
- GGCP will ensure that personal data is kept confidential and is only accessible to individuals who require it for legitimate purposes.
- Staff and volunteers are required to keep any information they access confidential and may not disclose personal data without authorization.

7.2 Confidentiality Agreements
- All staff, volunteers, and contractors who may have access to personal data are required to sign a confidentiality agreement as part of their induction.

- Breach of confidentiality is taken seriously and may result in disciplinary action, termination, or legal proceedings.

8. Data Security Measures

GGCP will implement appropriate technical and organizational measures to protect personal data, including:
- Access Controls: Restricting access to personal data to authorized individuals only.
- Data Encryption: Encrypting sensitive data and ensuring secure transmission of data.
- Secure Storage: Storing physical records securely and ensuring electronic data is stored on secure, password-protected systems.
- Regular Audits: Conducting periodic audits of data practices to identify and address potential vulnerabilities.

9. Data Retention and Disposal

- GGCP will retain personal data only for as long as necessary to fulfill its purposes and meet legal or regulatory requirements.
- When data is no longer needed, GGCP will ensure it is securely deleted or shredded in the case of physical records, and permanently erased from electronic systems.

10. Data Subject Rights

GGCP respects the rights of individuals whose data it processes, including:
- Right to Access: Individuals have the right to request access to their personal data and obtain copies.
- Right to Rectification: Individuals have the right to request corrections to inaccurate or incomplete data.
- Right to Erasure: Individuals can request the deletion of personal data where there is no lawful reason for its retention.
- Right to Restrict Processing: Individuals can request a restriction on data processing in certain circumstances.
- Right to Data Portability: Individuals have the right to receive their data in a structured, commonly used, and machine-readable format.
- Right to Object: Individuals can object to data processing based on legitimate interests or direct marketing.

11. Data Breaches

11.1 Identifying and Reporting Data Breaches
- All staff and volunteers must report any suspected data breach to the Data Protection Officer (DPO) immediately.
- GGCP will conduct an investigation of reported breaches to assess their nature, scope, and impact on data subjects.

11.2 Responding to Data Breaches
- GGCP will notify affected individuals without undue delay if their data is at risk due to a breach, and the ICO (Information Commissioner's Office) will be informed within 72 hours for significant breaches.
- Measures will be taken to mitigate any harm resulting from the breach and to prevent similar incidents in the future.

12. Data Protection Officer (DPO)

- GGCP will appoint a Data Protection Officer responsible for overseeing data protection practices, ensuring compliance, and providing guidance on data protection issues.
- The DPO will be available to handle data protection queries and support staff in meeting their data protection responsibilities.

13. Training and Awareness

- GGCP will provide mandatory data protection training to all staff and volunteers during their induction, with regular refresher training to reinforce data protection practices.
- Training will cover data security, confidentiality, breach reporting, and rights of data subjects under GDPR.

14. Policy Review

This policy will be reviewed annually by the Board of Trustees to ensure compliance with current legislation and best practices. Adjustments will be made as necessary to address changes in data protection laws or operational requirements.

15. Compliance with Legislation

This policy is designed to meet the requirements of:
- The Data Protection Act 2018
- The General Data Protection Regulation (GDPR)
- All relevant guidance from the Information Commissioner's Office (ICO)

GGCP is committed to remaining up-to-date with changes in data protection legislation and adapting its practices as necessary.

16. Contact Information

For questions, requests regarding personal data, or to exercise data rights, please contact:
- Data Protection Officer (DPO): Richard Hatwood (Responsible Individual) on 01978 852342 or Headteacher@allsaints-pri.wrexham.sch.uk
- Chair of Trustees: Mrs Jan MacDonald on 01978 852342 or playgroup@allsaints-pri.wrexham.sch.uk