



FARNEY CLOSE SCHOOL

GDPR Policy

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Signed	
Role	Principal
Date Approved	

Farney Close School acknowledges its duty of care to safeguard, protect and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice. This knowledge has informed the writing of this policy.

Introduction

Farney Close School is committed to protecting and respecting the privacy of those it works with. As required by the regulations of the General Data Protection Regulations, we want to tell you how we use and protect your personal information. This includes informing you of your rights regarding your personal information that we hold.

This policy reflects the UK GDPR, Data Protection Act 2018 and the Data (Use and Access) Act 2025, which introduces refinements to UK data protection law and sets out how we may obtain, use, process and store your personal information. By providing us with your data, you warrant to us that you are over 13 years of age.

Our full contact details are:

Farney Close School Ltd,
Bolney Court,
Bolney,
West Sussex
RH17 5RD

Email: admin@farneyclose.co.uk

Tel: 01444 881811

Making sure that information that we have on you is accurate.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at admin@farneyclose.co.uk.

What data we collect about you, for what purpose and on what grounds we process it?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data:**

This includes any communication that you send to us whether that be through our website, by mail, email or other electronic means. On the grounds of processing this data process as part of our legitimate interests, we maintain this information for communicating with you, for record keeping and for the establishment, pursuance, or defence of legal claims.

- **Parent, Carer, and Children & Young Person Data:**

This includes information and data such as, but not limited to, your contact details, including your address, email, telephone numbers. It also includes historical and current information in relation to children and young people and their Special Needs, Assessments and Recording of Progress, Attainment and

Examinations. Any relevant Medical Information that we need to be aware of. Also, Permissions for participation activities, Child Protection and Safeguarding, Interventions, Complaints, Reporting, in terms of Annual Statutory Reviews, Looked After Children and Children in Need reviews, End of year and termly reports, Diaries and logs, General correspondence by mail, email or other electronic means and communication with third parties, all of which are kept and maintained in relation to the legitimate interest of caring and educating children and young people at the school. We may process your personal data without your knowledge or consent where this is required or permitted by law.

- **Employee Data:**

On the grounds of maintaining a legitimate interest, this includes data such as, but not limited to, information in relation to contact details including your address, telephone, email. Also References, Work History, Qualifications, Pay, National Insurance and Tax details, Employment Contract, School policies, guidance and requests, Disciplinary information, Continuing Professional Development Training records, Information and Records in relation to the upkeep of the Single Central Register, and records of general employee correspondence. We may process your personal data without your knowledge or consent where this is required or permitted by law.

- **Customer/Contractual Data:**

On the grounds of maintaining a legitimate interest, this includes data such as, but not limited to, relating to business between ourselves, Local Authority agencies and departments, Suppliers, traders, specialists and consultants. This includes information in relation to billing, contact details including email, address and telephone numbers. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract. We may process your personal data without your knowledge or consent where this is required or permitted by law.

- **Visitors:**

On the grounds of safeguarding and maintaining a legitimate interest, we collect information on you when you sign in. This will include your name, reason for visiting, car registration and a digital photograph. By signing in to visit the school, all visitors accept that they will comply with our GDPR guidance, Safeguarding procedures and the onsite Health & Safety policy.

How we collect your personal data?

As part of our legitimate interests, we may collect data about you by you providing it directly to us, for example when you request information by filling in forms on our website, when you call, email, other electronic means or when you write to us directly. We may also automatically collect certain data from you when you visit the school, or when an application is made for a child or young person placement or employment. We also collect information from you when we enter into a contract, for example with referring Local Authorities, Suppliers, Trades, Specialists and Consultants or as part of compliance with government or other statutory bodies.

Who will we share your personal information with?

As part of our legal obligations, where there is child protection or safeguarding concerns, we may have to share your personal information with other agencies, schools or organisations.

- **In relation to children and young people and their parents or carers**, we only share information with other persons or agencies working directly to support a child or young person in school and, for example, referring Local Authorities, Social Workers, Local Health Authorities, or their authorised persons and government or other statutory bodies. We also share limited information to other possible future schools or colleges, and to Exam boards as part of our/their legitimate interests, and to employers in the form of reference/application information.
- **In relation to employees**, as part of our legitimate and legal obligations, we only share information in relation to your payroll and HMRC obligations and, with your knowledge, we would also provide information to future employees or training organisations on request and government or other statutory bodies.
- **In relation to contractors, specialist, suppliers, or trades**, we will not share information to others unless it is at your request or with prior consent.
- **In relation to visitors**: we will not share your data and information unless there is a child protection or safeguarding concern.

Will we transfer your personal data and information outside of the UK?

- **In relation to children and young people, parents, and carers**, we will only transfer data and information to agencies or schools in another country where it is in the best interests of the child/young person or where there is a child protection or safeguarding concerns.
- **In relation to employees**, we would only transfer data and information at your request or unilaterally where there is a child protection or safeguarding concerns.
- **In relation to contractors, specialist, suppliers, or trades**, only at your request, or unless there is a child protection or safeguarding concern.
- **In relation to visitors**, no, unless there is a child protection or safeguarding concern.

How do we keep your data and information secure?

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a legitimate or legal need to know such data and information. They will only process your personal data and information on our instructions, and they must keep it confidential.

How long will we keep your data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity. We also take into account the potential risk of harm from unauthorised use or disclosure, and the processing purposes if these can be achieved by other means and legal requirements.

More specifically, in relation to young people and employees, please refer to the Data Retention Schedule Policy as to how long data is retained in order to satisfy any legal or reporting requirements.

What are your legal rights in relation to the data and information that we keep on you?

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to the transfer of data and, where the lawful ground of processing is consent, to withdraw that consent.

You can see more about these rights at:

<https://ico.org.uk/fororganisations/guidetothe-general-data-protectionregulationgdpr/individual-rights>

If you wish to exercise any of the rights set out above, please email us at:

admin@farneyclose.co.uk

You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive, and we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), who are the UK supervisory authority for data protection issues (www.ico.org.uk).

Naturally, we will always try our best to provide a good response to any enquires or concerns and so if you are unhappy, we would be grateful if you contacted us first if you do have a complaint so that we can try to resolve it for you.

Data requested by a judge or from a judicial submission will be processed by Farney Close School in compliance with UK GDPR Laws. Where compliance is not clear, Farney Close School will take Legal advice before the release of any data.

Complaints & Escalation (Data Protection Complaints)

Farney Close School is committed to handling personal data in a fair, lawful and transparent manner. We recognise the importance of providing a clear and accessible process for individuals to raise concerns about how their personal data has been used or handled.

How to Make a Data Protection Complaint

Any individual (including pupils, parents/carers, employees, or visitors) who has concerns about the way in which the school processes personal data has the right to make a complaint directly to the school in the first instance.

Complaints can be made by contacting the school using the details below:

Data Protection Officer (DPO) Ray Lau, Vice Principal.

- **Email:** dpo@farneyclose.co.uk
- **Telephone:** 01444 881811
- **Address:** Farney Close School Ltd, Bolney Court, Bolney, West Sussex, RH17 5RD

Where possible, complaints should include:

- The nature of the concern
- Relevant dates and details
- Any supporting information

Acknowledgement and Response Times

The school will:

- Acknowledge receipt of a data protection complaint **within 5 working days**
- Investigate the complaint promptly and fairly
- Provide a written response **within one calendar month (30 days)** of receipt

Where a complaint is complex or requires further investigation, the school will inform the complainant of any delay and provide an updated timeframe.

Internal Handling of Complaints

All data protection complaints will be:

- Reviewed by the Principal or a designated senior leader
- Investigated in line with data protection legislation and school procedures
- Recorded and monitored to support continuous improvement

Where appropriate, the school may seek advice from the Data Protection Officer, external consultants or legal advisors to ensure compliance with UK GDPR and related legislation.

Escalation

If a complainant is not satisfied with the school's response or feels that their concern has not been adequately addressed, they have the right to escalate their complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Contact details for the ICO are as follows:

- **Website:** www.ico.org.uk
- **Telephone:** 0303 123 1113
- **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We encourage individuals to contact the school in the first instance so that we can attempt to resolve concerns promptly and effectively.