The New Walk School *Bespoke support. Brighter futures.*

Data Protection Policy

The New Walk School policy framework

Policy	Data Protection Policy	**Version**	V1
Issue date	08 May 2026	**Next review**	08 May 2027
Policy owner	Headteacher	**Approved by**	Directors of The New Walk School Ltd

1. About The New Walk School

The New Walk School is an independent specialist day school for pupils aged 7 to 19 who have Social, Emotional and Mental Health (SEMH) needs, autism spectrum conditions, learning difficulties and communication difficulties. The school is located on New Walk in Leicester — a setting with a long-standing association with academic life — and is operated by The New Walk School Ltd, a Company Limited by Guarantee.

The majority of our pupils hold an Education, Health and Care Plan (EHCP) and many have experienced previous educational placements that did not meet their needs. Our offer combines a broad academic curriculum with an in-built therapeutic provision rooted in the PACE model — Playfulness, Acceptance, Curiosity and Empathy — developed by Dr Dan Hughes. PACE is a relational approach designed to build trust, regulate distress and create the safety from which learning can take place. It informs how every adult in the school speaks to, listens to and works with our pupils.

3. Statutory framework

This policy is in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations, and the Education (Pupil Information) (England) Regulations 2005. The school is registered with the Information Commissioner's Office (ICO).

4. Data Protection Officer

The New Walk School Ltd appoints a Data Protection Officer (DPO). The DPO advises the school on its UK GDPR obligations, monitors compliance, manages data subject requests, and is the point of contact for the ICO.

5. Data protection principles

Personal data is processed: lawfully, fairly and transparently; for specified, explicit and legitimate purposes; in a way that is adequate, relevant and limited to what is necessary; accurately and kept up to date; for no longer than is necessary; and securely.

6. Lawful bases for processing

The school relies on the following lawful bases under Article 6 UK GDPR: legal obligation (e.g. statutory returns, KCSIE compliance); public task (delivering education); contract (employment); consent (e.g. some images); and legitimate interest. For special category data, the school relies on additional Article 9 conditions, principally the safeguarding-of-children condition under the Data Protection Act 2018, Schedule 1, Part 2.

7. Categories of data processed

- Pupil personal and special category data (contact, EHCP, medical, behaviour, attendance, attainment, safeguarding).
- Staff personal and special category data (employment, payroll, vetting, performance).
- Family contact and consent data.
- Visitor and contractor data.
- CCTV data, where the school operates CCTV.

8. Sharing data

Personal data is shared only where there is a lawful basis. Routine sharing includes: with placing local authorities; the DfE (statutory returns); next schools or settings (UK GDPR-compliant transfer of records); the NHS for medical purposes; and with safeguarding partners (Children's Social Care, Police) under safeguarding legislation.

9. Data subject rights

Pupils, parents and staff have the right to: access their data; have inaccurate data corrected; have data erased in defined circumstances; restrict processing; portability; object; and not be subject to automated decision-making. Requests are made to the DPO and responded to within one month.

10. Data breaches

Suspected breaches are reported to the DPO without delay. The DPO assesses the breach and, where there is a risk to data subjects, reports to the ICO within 72 hours and informs affected individuals. Breach response is recorded in the school's breach log.

11. Data retention

The school retains data only as long as necessary, in line with the IRMS Toolkit for Schools and statutory requirements. Safeguarding records are retained as required by KCSIE. The Records Management Policy sets out the schedule in detail.

12. Training

All staff complete data protection training at induction and annually thereafter.

13. Use of CCTV

Where CCTV is in use on the premises, it operates in line with ICO guidance, with clear signage, defined retention, restricted access, and a separate impact assessment available on request.

14. Photography and image use

Photographs and recordings of pupils are taken only on school equipment, only with appropriate consent, and only for educational, communications or safeguarding purposes consistent with consent given. Pupils' images are not published externally without specific written consent.

Monitoring and review

This policy is reviewed annually by the Headteacher in consultation with the senior leadership team and the Directors of The New Walk School Ltd. It will be reviewed earlier where there is a material change in legislation, statutory guidance or the operational needs of the school. The most recent version is held on the school's policy register and is made available to parents, carers and staff on request.

Linked policies and documents

This policy should be read alongside the school's wider policy suite, including: Safeguarding and Child Protection; SEND; Behaviour and Relationships; Anti-Bullying; Equality, Diversity and Inclusion; Health and Safety; Curriculum; and Complaints.