

Special Category Data Policy

Approved: January 2026

Approved by: Executive Headteacher

Review due: January 2027

Lead author: Trust Data Protection Officer

OUR VISION

A community of primary and secondary academies that are the first choice for students and families in Sussex, with an outstanding reputation for high aspiration and high achievement.

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1. Policy Statement

SDLT is committed to ensuring that all personal data it processes is managed appropriately and in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018) (collectively referred to as “DP legislation”). The school recognises its duties to protect all personal data but in particular Special Category Personal Data as defined under Data Protection legislation i.e. information that may identify an individual’s:

- racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,
- health,
- sex life/orientation
- genetic/biometric identifier
- criminal convictions/offences

The school is also committed to process criminal offence data in accordance with DP legislation requirements. Criminal offence data refers to personal data that relates to criminal convictions and offences and associated security measures. This includes the alleged commission of offences or proceedings for an offence committed or alleged to have been committed, including sentencing.

The school will ensure that all Special Category Data is captured, held and used in compliance with this policy. Any proposed new use of Special Category Data will be subject to a Data Protection Impact Assessment.

For all uses of Special Category Data, the processing will be included in the school’s Record of Processing Activity (ROPA). This will include a description of the lawful basis for processing and confirmation that the appropriate data retention rules are being applied.

Failure to comply with this policy may be subject to disciplinary procedures.

2. Responsibilities

The Headteacher has overall responsibility for ensuring compliance with this policy and with DP legislation across the school.

The Data Protection Officer (DPO) has responsibility for advising the organisation on data protection matters, and for monitoring compliance with this policy.

All staff are responsible for understanding and complying with relevant policies and procedures for processing and protecting special category data.

3. Related Documents

- Information Security/Data Protection Policy
- Record of Processing Activity (Information Asset Register)
- Acceptable Use Policy
- Retention Schedule

4. Compliance with the Principles

All processing of personal data, including Special Category Data, is subject to the school's Data Protection and Information Security Policy and all related procedures for data handling.

Below is a summary of our procedures for compliance with the principles under Article 5 of GDPR.

<p>Personal data collected and processed will be adequate, relevant and limited to what is necessary for the purpose for processing (data minimisation')</p>	<p>To adhere to the principle of privacy by design, the school only collects and holds data as necessary for their operational requirements or to meet statutory obligations.</p> <p>Staff have roles-based access and are trained to record only the minimal necessary personal data for business needs.</p>	<ul style="list-style-type: none">• Data Protection Policy• DPIA procedure / template• Information governance or DP training for staff <p>School data protection training document/log</p>
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	This will also be checked within the school DPIA process.	
Personal data will be accurate and where required, rectified without delay (accuracy')	The school has systems in place to verify the accuracy of the data it holds. This includes EduLink.	<ul style="list-style-type: none"> • Data Protection Policy • DP training for staff School data protection training document/log
Personal data will not be kept in an identifiable form for longer than necessary ('storage limitation') i.e. in line with the school retention schedule	A Senior Assistant Headteacher in school has responsibility for ensuring that the retention schedule is applied to all personal data, and in particular to special category data and criminal offence data. Where systems do not have the functionality to automate disposal, staff have a scheduled task to manually delete time-expired data.	<ul style="list-style-type: none"> • Data Protection Policy • School Records Management policy • DP training for staff School data protection training document/log
Personal data will be kept securely	<p>All use of personal data is subject to our Data Protection and Information Security Policy and related security measures.</p> <p>Staff are trained to be particularly aware of the additional risks to Special Category Data and the relevant individuals have appropriate data-handling processes and guidance.</p> <p>Appropriate means of transmitting data are used. Data is securely stored and securely disposed of (where retention periods are reached).</p> <p>Where processing is sub-contracted or outsourced</p>	<ul style="list-style-type: none"> • Data Protection Policy • School Records Management policy • DP training for staff School data protection training document/log

	there are suitable Data Protection clauses in the contract.	
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Contact

If you have any questions about this policy, please contact: DPO@ratton.co.uk