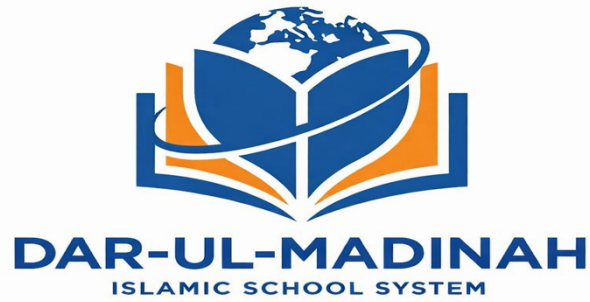




Darul Madinah will nurture our learners into model citizens that exemplify the Inherent values of Islam make a positive contribution to the community and are champions of their faith.

Data Protection Policy

This policy is in line with the Mission Statement of the School

Document Control

This policy has been approved for operation within Darul Madinah Primary School

Date of last review: August 2026

Date of next review: August 2027

Review period: Annually

Policy Status: Statutory

Owner: Directors

Darul Madinah Data Protection Policy

ICO Registration Number: ZB666156

Data Protection Officer (DPO): Waqas Chaudhery – Director

Sites Covered: Darul Madinah Slough – Chalvey Branch (School + Nursery) and Bath Road Branch (Nursery)

1. Introduction

Darul Madinah is committed to protecting the privacy and security of all personal data belonging to pupils, parents, staff, volunteers, governors, visitors, contractors, and any individuals who interact with the organisation. As an independent school and early years provider regulated by the DfE, Ofsted and the Independent School Standards, Darul Madinah is legally required to comply with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

This policy explains how the organisation collects, stores, uses, shares and protects personal information. It applies to both Darul Madinah settings in Slough: the **Chalvey branch**, which includes a nursery and primary school, and the **Bath Road nursery branch**.

We recognise that strong data protection practices are essential for safeguarding, trust, accountability and lawful management of educational services. The organisation fully acknowledges its responsibilities as a Data Controller and ensures that all processing is carried out in accordance with the legislation.

2. Commitment to Data Protection Principles

Darul Madinah fully adheres to the **seven principles of UK GDPR**, ensuring that all personal data is:

1. **Processed lawfully, fairly and transparently**
2. **Collected for explicit and legitimate purposes only**
3. **Limited to what is necessary for operational purposes**
4. **Accurate and kept up to date**
5. **Retained only for as long as necessary**
6. **Processed securely and protected from unauthorised access**
7. **Handled with accountability and documented evidence of compliance**

These principles underpin all data processing activity across both Darul Madinah sites.

3. Roles and Responsibilities

The **Data Protection Officer (DPO)** is **Mr. Waqas Chaudhery**, Director of Darul Madinah. He is responsible for overseeing compliance, training, audits, and responding to ICO queries.

All staff members, including teachers, early years practitioners, administrative staff, and volunteers, are required to follow this policy and participate in annual data protection refreshers.

Contractors, agency staff, IT providers, and consultants who access Darul Madinah personal data must sign compliance agreements confirming they meet UK GDPR standards.

4. Types of Data Processed

Darul Madinah processes a wide variety of personal data to fulfil legal duties and provide educational, childcare and safeguarding services. This includes:

Pupil Data

- Personal details, contact information, family details
- Educational records, assessments, safeguarding files
- Medical, dietary, SEND and pastoral information
- Behaviour, attendance, attainment, intervention and progress records
- Images and videos (for learning, evidence, social media with consent)

Staff Data

- Employment records, right-to-work information
- Qualifications, DBS checks, references
- Biometric sign-in information (fingerprint system)
- Performance management, supervision and training records

Parent/Carer Data

- Contact details, emergency contacts
- Fees and payment information
- Consent forms and communications via Famly

Special Category Data

Processed only where necessary and lawful:

- Health and medical needs
- SEND information
- Safeguarding or child protection records
- Religious or ethnic background (as part of census requirements)

5. Lawful Basis for Processing

Darul Madinah processes personal data under the lawful grounds provided by Article 6 of UK GDPR, including:

- **Public Task** – education and safeguarding functions
- **Legal Obligation** – EYFS, KCSIE, ISS, employment law
- **Contract** – employment or service agreements
- **Consent** – optional areas (photos for social media, trips, marketing)
- **Vital Interests** – emergencies and safeguarding

- **Legitimate Interests** – security and operational efficiency

Special Category Data is processed under Article 9 of UK GDPR, including substantial public interest, safeguarding, and health purposes.

6. Data Sharing

Darul Madinah may share data where legally required or operationally necessary, including with:

- Slough Children's Services (safeguarding)
- Local Authority SEND services
- Ofsted / DfE / ESFA
- NHS (health visitors, school nurses, paediatricians)
- Police (where lawful)
- Payroll providers, pension schemes, insurers
- External tutors or educational specialists when appropriate

We never sell or pass personal data to third parties for marketing.

7. CCTV Processing

Darul Madinah operates CCTV systems at both Slough sites exclusively for safeguarding, security and operational monitoring.

Chalvey Branch (Nursery + School): 16 cameras

Bath Road Branch (Nursery only): 8 cameras

Footage is stored securely on encrypted DVRs accessible only to the Headteacher and the Director (DPO). Recordings are kept for **a maximum of 6 days**, after which they are automatically overwritten unless needed for an incident investigation.

Footage may be shared with safeguarding authorities or police, where lawful. Parents cannot request CCTV access except through a valid Subject Access Request, and footage cannot be shared if third-party identities cannot be protected.

8. Biometrics

Darul Madinah uses a biometric fingerprint system for staff sign-in. Staff provide consent before enrolment. This data is encrypted, stored securely, and cannot be used for any other purpose. Parents and children are not enrolled.

9. Online Platforms and Digital Tools

The organisation uses several digital platforms, all compliant with UK GDPR:

- **Family App** (parent communication, attendance, EYFS evidence)
- **School social media accounts** (Facebook, TikTok) with parental consent

- **Google Workspace / Microsoft tools** for administrative functions
- **Online payments** for fees and school services

All suppliers are required to provide compliance assurances.

10. Data Retention and Storage

Data is stored only for as long as needed. Darul Madinah follows:

- **Statutory retention schedules** (DfE, Ofsted, NHS, HMRC)
- **Safeguarding records retained until pupil is 25**
- **Staff records retained for 6 years after employment**
- **CCTV retained for 6 days**
- **Financial records retained for 7 years**
- **Consent-based photos deleted when consent withdrawn**

11. Security Measures

The organisation uses physical, digital and procedural security measures, including:

- Locked filing systems for paper records
- Encrypted servers and password protection
- Restricted access to safeguarding files
- Staff training in data handling
- Secure transfer protocols when sending sensitive documents
- Incident reporting procedures for data breaches

12. Data Subject Rights

Under UK GDPR, individuals have the right to:

- Access their data (Subject Access Request)
- Request rectification or deletion
- Object to certain processing
- Request restriction of processing
- Data portability (where applicable)

All requests should be sent to:

✉ **slough@darulmadinah.co.uk** (Headteacher)

✉ **Operations.slough@darulmadinah.co.uk** (DPO)

We respond within **one calendar month**.

13. Data Breaches

Any suspected data breach must be reported immediately to the **Headteacher or DPO**. All breaches are logged, investigated, and reported to the ICO within **72 hours** where legally required.

14. Responsibilities of Staff

All staff must:

- Keep data secure at all times
- Use only approved devices and platforms
- Follow password and lock-screen procedures
- Dispose of documents using secure shredding
- Report concerns immediately
- Complete annual data protection training

15. Monitoring and Review

This policy is reviewed annually or sooner if legislation changes. Updates are approved by the Director and Headteacher.

Appendix – Additional GDPR Compliance and Data Protection Procedures

Information Commissioner's Office (ICO)

Individuals have the right to raise concerns regarding the handling of their personal data directly with the Information Commissioner's Office (ICO).

Information Commissioner's Office (ICO)

Website: <https://ico.org.uk>

Helpline: 0303 123 1113

Darul Madinah will cooperate fully with the ICO where required.

Additional Data Subject Rights

In addition to the rights outlined within this policy, individuals also have the right to:

- Withdraw consent at any time where consent is the lawful basis for processing
- Lodge a complaint with the ICO if they believe their personal data has been handled unlawfully
- Be informed about how their data is collected and processed through relevant privacy notices

Darul Madinah maintains separate privacy notices for:

- Parents and carers
- Pupils
- Staff
- Volunteers
- Job applicants

These notices explain how personal data is collected, processed, stored and shared.

Subject Access Request (SAR) Procedures

Subject Access Requests will normally be responded to within one calendar month in accordance with UK GDPR requirements.

The organisation may:

- Request proof of identity before releasing information
- Refuse requests where exemptions lawfully apply
- Refuse or charge for requests that are manifestly unfounded or excessive

All Subject Access Requests must be directed to the Headteacher or Data Protection Officer (DPO).

Remote Working and Device Security

All staff are responsible for ensuring personal data remains secure both on-site and off-site.

Staff must:

- Use password-protected devices only
- Lock screens when devices are unattended
- Avoid downloading sensitive information onto unsecured personal devices
- Use only approved systems and platforms
- Store paper records securely when working off-site
- Ensure confidential documents are not visible to unauthorised individuals
- Avoid the use of personal USB devices for school data unless specifically authorised

Any loss, theft or suspected compromise of devices or information must be reported immediately to the Headteacher or DPO.

Data Breach Response Procedures

In the event of a suspected or confirmed data breach, Darul Madinah will take immediate action to:

1. Contain the breach and prevent further loss of data
2. Assess the risks posed to individuals and the organisation
3. Record the nature and circumstances of the breach
4. Notify the ICO within 72 hours where legally required
5. Inform affected individuals where there is a high risk to their rights or freedoms
6. Review the incident and implement improvements to reduce future risk

All breaches, regardless of severity, will be logged and reviewed by the Headteacher and DPO.

CCTV Transparency and Signage

Appropriate CCTV signage is displayed at all Darul Madinah sites to ensure transparency regarding surveillance and monitoring.

CCTV is used solely for:

- Safeguarding
- Security
- Health and safety
- Incident investigation

Recordings are processed in accordance with UK GDPR and access is strictly restricted.

Biometrics Safeguards

Staff enrolled onto the biometric sign-in system provide written consent before processing begins.

Staff may:

- Withdraw consent at any time
- Request alternative sign-in arrangements

Biometric data will not be used for any purpose other than staff sign-in and attendance monitoring.

Monitoring and Compliance

The Headteacher and Data Protection Officer (DPO) are responsible for monitoring compliance with this appendix and ensuring procedures remain aligned with:

- UK GDPR
- Data Protection Act 2018
- Keeping Children Safe in Education (KCSIE)
- Independent School Standards (ISS)
- EYFS safeguarding and welfare requirements

This appendix will be reviewed annually or sooner if legislation or operational requirements change.