

# Quwwat-ul-Islam Girls' School



*Together we can achieve more*

## Appropriate Policy

|                |                                                                                                                  |
|----------------|------------------------------------------------------------------------------------------------------------------|
| Published Date | September 2026                                                                                                   |
| Review Date    | July 2027                                                                                                        |
| Policy Links   | Privacy Notice for Pupils, Parents and Carers<br>Confidentiality Policy<br>Data retention and destruction Policy |

|                                                            |
|------------------------------------------------------------|
| School Motto                                               |
| Together we can achieve more                               |
| School Values                                              |
| Respect . Aspiration . Responsibility                      |
| Learning Drivers                                           |
| Caring for Ourselves, Our World, Our Education, Our Rights |

### **School Vision Statement**

To establish a school of excellence both **Islamically** and **Academically** - Provide a **holistic** education which is inspired by: **Taqwa**: God consciousness **morals and values** inspired by the prophet (saw) coupled with **academic excellence**.

At Quwwat-Ul-Islam girls' school we adhere to the following:

- **Mutual respect and tolerance** - We respect and care for everybody.
- **Democracy**– We promote the right of every individual to have their opinions and voices heard.
- **The rule of the law** – We understand that laws and rules protect us and at the same time provide us with responsibilities, by breaking them there are consequences.

Quwwat ul Islam Girls' School is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, the school expects all staff, governors, volunteers and parents/carers to share this commitment.

# Quwwat-UI-Islam Girls School

**Name:** Appropriate Policy Document

**Purpose:** As required under Schedule 1, Part 4, Data Protection Act 2018

**Date Approved:** 2nd September 2024

## Revision History:

| Version | Date    | Amendment Details                                                                                          | Author |
|---------|---------|------------------------------------------------------------------------------------------------------------|--------|
| 0.2     | 28/3/24 | Second draft                                                                                               | DPO    |
| 0.3     | 4/11/24 | Addition of clarity around optional data; addition of UK GDPR Article 9 as well as Schedule 1 of DPA 2018. | Rachel |
|         |         |                                                                                                            |        |
|         |         |                                                                                                            |        |

**Review Date:** 24 Months from Last reviewed – 01/09/2026

## Signoff:

| Role                               | Name         | Date     |
|------------------------------------|--------------|----------|
| Chair of Governors                 | Mr F Patel   | 11/12/24 |
| Head Teacher                       | Ms S Member  | 11/12/24 |
| Administration/Recruitment Officer | Ms Z Sarigat | 11/12/24 |

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## 1. Introduction

As part of Quwwat-UI-Islam Girls School public function as an education provider, we process Special Category and Criminal Offence data in accordance with Article 9 of the UK General Data Protection Regulation (UK GDPR) and Schedule 1 of the Data Protection Act (2018) (DPA).

Schedule 1 Part 4 of the DPA requires us to have in place this document, called an 'Appropriate Policy', when we rely on certain conditions for processing Special Category and Criminal Offence data. This policy will tell you what Special Category or Criminal Offence data we process, our lawful basis (Schedule 1 condition in the DPA and Article 9 condition in UK GDPR) for processing it, the purposes for which we process it, and how we ensure compliance with the principles of data protection law provided in Article 5 of the UK GDPR.

We will also tell you how long we will hold the Special Category and Criminal Offence data. Some of the information is already held in other documents on the Quwwat-UI-Islam Girls School website.

## 2. Description of the data processed

We process the following types of Special Category and Criminal Offence data

- Health and disability
- Religious/philosophical belief
- Ethnic/racial background
- Criminal offence data (CCTV)
- Staff Biometric Data

## 3. Special Category and Criminal Offence Datasets

The following datasets are processed if the data subject has given explicit consent, or one of the conditions below is applicable:

- Governors Disciplinary Documents
- Safeguarding Data
- SEN Data
- Staff Medical Records
- Staff Cultural Data
- Student Cultural Data
- Student Medical Records
- Staff Biometric Data
- Staff Criminal Offence Data
- Student Criminal Offence Data

### **Employment and social protection (Schedule 1 Part 1 para 1)**

where Quwwat-UI-Islam Girls School needs to process Special Category and Criminal Offence data for the purposes of performing its obligations or rights as an employer, or for guaranteeing the social protection of individuals.

### **Health or social care purposes (Schedule 1 Part 1 para 2)**

where Quwwat-UI-Islam Girls School needs to process Special Category data for the purposes of the health protection of individuals.

### **Public health (Schedule 1 Part 1 para 3)**

where Quwwat-UI-Islam Girls School needs to process Special Category data for the purposes of public interest in the area of public health.

The following substantial public interest conditions may also have used:

### **Equality of opportunity (Schedule 1 Part 2 para 8)**

Where processing is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained. Note here that ethnicity and religious belief data is optional, and this is made clear at the point of collection.

### **Support for individuals with a particular disability or medical condition (Schedule 1 Part 2 para 16)**

Where Quwwat-UI-Islam Girls School needs to process Special Category for the provision of services and support to individuals.

### **Safeguarding (Schedule 1 Part 2 para 18)**

Where Quwwat-UI-Islam Girls School needs to process Special Category and Criminal Offence data in order to protect the physical, mental or emotional well-being of an individual under the age of 18, or over the age of 18 and at risk, only where, in the circumstances, consent cannot be given by the data subject, cannot be reasonably obtained from the data subject, or where the processing must be carried out without the consent of the data subject because obtaining the data subject's consent would prejudice the provision of the protection, and is necessary for reasons of substantial public interest.

For further information on special category and criminal offence data sets, please refer to Appendix 1 and Appendix 2.

## **4. How we comply with the data protection principles in Article 5 of the UK GDPR**

Article 5(2) of the UK GDPR requires Data Controllers to demonstrate how they comply with the data protection principles provided in Article 5(1). This section illustrates the measures we have taken to demonstrate accountability for the personal data we process, and contains details about how we ensure compliance with the principles of the UK GDPR.

#### **4.1 Accountability**

We demonstrate our compliance with the data protection principles provided in Article 5 of the UK GDPR through the following measures and documents:

We have appointed a Data Protection Officer whose role and responsibilities align with the provisions of Articles 37-39 of the UK GDPR.

Our ROPA sets out the personal data categories we process, the purposes, the lawful basis, our retention periods for the data, our legitimate interests, Article 9 and Schedule 1 conditions for processing, recipients of personal data, any international transfers of data and our means of keeping data secure.

Our Privacy Notices explain to individuals how and why their data is processed by the Quwwat-ul-Islam Girls School, what their rights are, and how they can contact our DPO and the ICO.

When we routinely and/or regularly share data with third parties, we enter into written agreements with Data Controllers and Data Processors which meet the provisions of Articles 26 and 28 of the UK GDPR respectively.

When we make decisions on whether to share data with third parties on an occasional or one-off basis, we do so in accordance with Data Protection Legislation.

We carry out Data Protection Impact Assessments (DPIA) for uses of personal data that are likely to result in a risk to individuals' data protection rights and freedoms.

We implement appropriate security measures which are proportionate to the risk associated with the processing.

We have Data Protection policies and procedures which are available on our website and upon request.

#### **4.2 Lawful, fair and transparent processing**

We provide clear and transparent information to individuals about why we process their personal data, including our lawful basis in our Privacy Notices. This includes information about why we process Special Category and Criminal Offence data.

We need to process Special Category Data for the substantial public interest conditions outlined in section 3 of this policy to meet the requirements of current legislation.

We process employment data to meet our legal obligations as an employer.

#### **4.3 Purpose limitation**

We process Special Category and Criminal Offence data where it is necessary to meet the following purposes.

- Equal opportunities monitoring, including statutory returns
- Certain work placements or casual work opportunities
- Supporting special arrangements, such as building access plans, study inclusion plans, and mitigating circumstances applications
- Providing individuals with appropriate support in a counselling session
- To allow us to fully investigate a complaint or grievance
- To understand dietary requirements based on health or belief
- Recording sickness absence
- Complying with health and safety obligations
- Where processing is necessary to respond to an emergency situation
- To fully process job applications
- For the prevention and detection of unlawful acts (e.g. incidents captured on CCTV)
- To verify the good character, competence and integrity of all staff and Governors/Trustees

We will not process any personal data for purposes which would be incompatible with the purpose for which the data was originally collected, and will inform data subjects when data we seek to collect is optional, and offer an easy way to refuse to share this data.

#### **4.4 Data minimisation**

We design our data collection forms and other data collection tools to ensure that we only collect the Special Category or Criminal Offence data necessary to achieve the purpose. Our purposes are set out in our Privacy Notices.

Where we operate systems which cannot control the volume of Special Category and Criminal Offence data collected (i.e. CCTV) we take measures to minimise the volume of data processed. We only monitor public spaces with the minimum number of cameras needed to cover the area, and we operate a short retention period of 30 days from the date the footage is recorded.

We are satisfied that we collect and retain Special Category and Criminal Offence data for long enough to fulfil our purposes. We collect enough but no more than we need in accordance with the data minimisation principle, and we only hold Special Category and Criminal Offence data for the period set out in our retention policies.

Our retention schedule sets out the correct disposal action once records containing Special Category and Criminal Offence data are no longer required.

#### **4.5 Accuracy**

When we identify data which is inaccurate or out of date, having due regard for the purpose for which the data was processed, we will take necessary steps to update, replace or erase it as soon as possible and within one month. If there is a specific reason we cannot rectify or erase the data, for instance because the lawful basis does not permit it, we will record the decision.

We provide interfaces for staff and students to keep their personal data up to date, as well as issuing regular reminders to update or provide equalities monitoring data.

## 4.6 Storage limitation

Special Category and Criminal Offence data processed by us, will be retained for the periods set out in our retention schedule. The retention periods are determined by our legal and regulatory obligations, and our organisational requirements. We regularly review our information and erase or anonymise when required.

The retention schedule is available to view upon request.

## 4.7 Security

We analyse risks presented by our processing and use this to assess the appropriate level of security we require for this data.

Data is held securely in line with our Data Protection Policy and our other policies and procedures which further detail out technical measures and controls. These documents are regularly reviewed and available upon request.

## 5. Retention and erasure policies

Our retention period and disposal actions for records containing Special Category and Criminal Offence Data is available upon request.

## 6. Appropriate Policy review date

This policy will be retained for the duration of the processing, and for a minimum of 6 months thereafter.

The policy will be reviewed every 24 months or revised more frequently if necessary.

## 7. Additional Special Category and Criminal Offence data

We also process Special Category Data and Criminal Offence Data where an Appropriate Policy Document is not required e.g. for archival, research and statistical purposes. In these circumstances we will respect the rights and interest of our data subjects by informing them about the processing in our Privacy Notices.

## Appendix 1

| Special Category Data Set        | Special Category Data  | Condition                                                  | Substantial Public Interest Conditions           | Rationale and legal requirements                                                                                              |
|----------------------------------|------------------------|------------------------------------------------------------|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Governors Disciplinary Documents | Trade Union Membership | Employment, social security and social protection          | N/A                                              | Trade Union Act 2016                                                                                                          |
| Safeguarding Data                | Health                 | Reasons of substantial public interest with a basis in law | Safeguarding of children and individuals at risk | In the public interest to safeguard children.<br>KCSiE 2024<br>Working Together to Safeguard Children Statutory Guidance 2023 |

|                              |                     |                                                            |                                                                           |                                                                                                |
|------------------------------|---------------------|------------------------------------------------------------|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| SEN Data                     | Health              | Reasons of substantial public interest with a basis in law | Support for individuals with a particular disability or medical condition | In the Public Interest to support children with special needs. Limitation Act 1980 (Section 2) |
| Staff Medical Data           | Health              | Employment, social security and social protection          | N/A                                                                       | Equality Act 2010<br>HMRC requirements for employers                                           |
| Staff Cultural Data          | Ethnicity, Religion | Reasons of substantial public interest with a basis in law | Equality of opportunity or treatment                                      | Equality Act 2010                                                                              |
| Student Cultural Data        | Ethnicity, Religion | Employment, social security and social protection          | Equality of opportunity or treatment                                      | Equality Act 2010<br>Education Act 2011<br>Public Sector Equality Duty April 2011              |
| Student Medical Data         | Health              | Reasons of substantial public interest with a basis in law | Safeguarding of children and individuals at risk                          | The Education (Student Information) (England) Regulations 2005 SI 2005 No 1437                 |
| Student/Staff Biometric Data | Biometric           | Explicit consent                                           | N/A                                                                       | N/A                                                                                            |

## Appendix 2

| Criminal Offence Data Set | Schedule 1 DPA 2018 Condition                        | Rationale and legal requirements                                                                                              |
|---------------------------|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Staff Data                | 1. Employment, social security and social protection | Employment Law                                                                                                                |
| Student Data              | 18. Safeguarding of children and individuals at risk | In the public interest to safeguard children.<br>KCSiE 2024 Working Together to Safeguard Children<br>Statutory Guidance 2023 |