



EDH Policy Framework for Schools, Academies & Trusts

[for internal use only]

Last Reviewed	First produced Spring 2024
Reviewed By (Name)	Clare Wilson
Job Role	Team Manager
Next Review Date	February 2026
Version produced Spring 2025	Amendments indicated in green text. KCSiE 2024 Changes around Cyber / Information Security & AU Agreement Pupil Friendly Privacy Notice

This framework will be reviewed annually and **sooner when** significant changes are made to the law.

Note:

- not all of these documents are produced by EDH, this is designed as an overview of how the documents interrelate
- School/ Trust/ Academy should hold a record of staff acknowledgement of all policies.

Policy Name Statutory or Recommended	Where to find it	Review Cycle	Other things to Note
Complaints Procedure	Local Authority or Multi Academy Trust	Owned by the LA / Trust.	Publish on website. Ensure this includes details of the Data Protection complaints process and details of your Data Protection Officer.
Critical Incident Plan also known as Business Continuity Plan Statutory (DfE)	Local Authority or Multi Academy Trust This will need contextualising for local issues and refer to the IT Disaster Recovery Procedure and Plan which could be appended to it	Owned by the LA / Trust.	Do not publish on website.
IT Disaster Recovery Procedure and Plan adds detail to the above where the critical incident affects IT infrastructure	EDH Cyber Policy Suite Data Protection Customers can find in GDPRis Toolkit	The EDH Cyber Security produce an updated template each April.	Do not publish on website.
Cyber Incident Response Plan generally, is incorporated into the IT Disaster Recovery Procedure and Plan, but has been extracted for RPA purposes. If you have the completed IT Disaster Recovery Procedure and Plan you will not need this as well (unless under RPA).	RPA schools can find it here: RPA-Cyber-Response-Plan-Template-V1.0.pdf (rpaclaimforms.co.uk)	Owned by the DfE RPA team.	Do not publish on website. A copy of this is needed by each School / Academy that is subscribed to RPA insurance, it cannot be held just at Trust level.

Risk Register legal requirement for academies and MATs, advisory for maintained schools.	Local Authority or Multi Academy Trust	Owned by the Trust.	Do not publish on website.
IT Risk Register template	EDH Cyber Policy Suite	The EDH Cyber Security team produce an updated template every 2 years (April, even numbered years)	Do not publish on website.
IT Asset Register template	EDH Cyber Policy Suite		Do not publish on website.
Digital Strategy template	EDH Cyber Policy Suite	The EDH Cyber Security team produce an updated template each April.	This should address digital continuity. Do not publish on website.
Cyber Incident Log template – only needed if GDPR is not used	EDH Cyber Policy Suite	The Cyber Security team keep this under review and produce an updated version every 2 years (April, even numbered years)	Do not publish on website.
Safeguarding/Child Protection Policy Statutory (KCSIE 2024)	Local Authority/ Local Safeguarding Partnership or Multi Academy Trust	Owned by the LA / Partnership / Trust.	

<p>Addendum to Child Protection Policy regarding Records Management should be appended to the Safeguarding/Child Protection Policy</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO team produce an updated template each April.</p>	<p>This should be added to the main Safeguarding policy and all staff with access to write report / make logs should be aware of it.</p> <p>This document is not required by schools and trusts in Derby City or Derbyshire County Council as it is embedded into to the Derby and Derbyshire Template Safeguarding/Child Protection Policy for Education Providers</p> <p>template_sg_cp_policy -for - schools and colleges final 19072024.docx</p>
<p>Data Protection Policy for Schools this policy contains several key annexes which should be noted inc:</p> <ul style="list-style-type: none"> - Breach procedure - DPIA procedure - SAR procedure - Freedom of Information. <p>Statutory (DfE)</p>	<p>EDH Data Protection Policy Suite</p>		
<p>Privacy Notice Pupil & Family</p> <p>Statutory</p>	<p>EDH Data Protection Policy Suite</p>	<p>As needed when changes are required e.g. when changes to external processors are made (if you publish this as a separate list then you just need to change the list).</p>	<p>It helps with transparency if you publish all of these on your website.</p> <p>If they are updated, let the relevant data subjects know by sending a message that the document has been updated and including a hyper-link to your website.</p>
<p>Privacy Notice Workforce</p> <p>Statutory</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO team produce an updated</p>	<p>You do not need to provide hard copies of these or ask data subjects to sign to acknowledge them. You just need to make them available.</p>

<p>Privacy Notice Governors</p> <p>Statutory</p>	<p>EDH Data Protection Policy Suite</p>	<p>template each April. Some changes may be made by the DfE in the interim which we will then update on the templates in April.</p>	<p>You should keep a log of old Privacy Notices in an archive, in the same way you are required to retain old policies.</p>
<p>Pupil Friendly Privacy Notice (recommended for Primary phase only)</p> <p>Recommended (DPO)</p>	<p>EDH Data Protection Policy Suite</p>		
<p>Record Retention Policy post IICSA enquiry</p> <p>Statutory</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO team produce an updated template each April.</p>	<p>The Retention Schedule is a template, you need to add your own school processes and consider retention (e.g. retention of email, social media posts, pupil work on external tools such as Google Classroom or Class Dojo).</p> <p>Ensure all staff are engaged with the Retention Schedule and that they retain/store/destroy records appropriately- both paper and electronic. Please also remember that data stored on external platforms is your responsibility to delete or download in line with your retention policies.</p> <p>If publishing on your website, please remove the columns labelled 'Format / How / Where this file is held' and 'Responsible Role' from the published version.</p>
<p>Social Media Policy</p> <p>Recommended (DPO)</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO & Cyber Security team produce an updated template each April.</p>	<p>These three policies 'flesh out' expectations regarding Social Media Use (whether or not your school has an official social media presence), staff use of their own devices and offsite/remote working. They provide extra guidance for staff. You can amend these policies to suit your particular</p>
<p>Bring Your Own Device Policy</p> <p>Recommended (DPO)</p>	<p>EDH Data Protection Policy Suite</p> <p>EDH Cyber Policy Suite</p>		

<p>Off Site Working Policy</p> <p>Recommended (DPO)</p>	<p>EDH Data Protection Policy Suite</p> <p>EDH Cyber Policy Suite</p>		<p>school. You may decide that this information sits better within your Staff Handbook if desired.</p>
<p>Information Security & Acceptable Use Policy (1)</p> <p>Recommended (DPO)</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO & Cyber Security team produce an updated template each April.</p>	<p>Schools do not need all 3 of these policies.</p> <p>Policy 1 is from the DP team. Policies 2 & 3 are from the Cyber team and is more specific to current Cyber threats.</p>
<p>Cyber Security Policy (2)</p> <p>Recommended (DPO)</p>	<p>EDH Cyber Policy Suite</p>	<p>The EDH Cyber Security team produce an updated template each April.</p>	<p>Schools should use the most appropriate template for them, either policy 1 on its own or 2 and 3 together.</p>
<p>IT Acceptable Use Policy (3)</p> <p>Recommended (DPO)</p>	<p>EDH Cyber Policy Suite</p>	<p>The EDH Cyber Security team produce an updated template each April.</p>	<p>These policies were drafted by the Education Data Hub team to help schools to demonstrate the appropriate documentation is in place to obtain Cyber Essentials Certification. Cyber Essentials is currently voluntary.</p> <p>Schools should ensure these documents reflect actual practice at the school.</p>
<p>Remote Learning Policy</p> <p>Recommended (DfE)</p>	<p>EDH Data Protection Policy Suite</p> <p>EDH Cyber Policy Suite</p>	<p>The EDH DPO team produce an updated template each April.</p>	
<p>CCTV Policy</p> <p>guidance and review documents are also available.</p> <p>For schools with or thinking about CCTV</p> <p>Recommended (ICO)</p>	<p>EDH Data Protection Policy Suite</p>	<p>Review your use of CCTV annually using the checklist in the annexe- the policy itself may be reviewed on a less frequent basis, depending on use of CCTV at your school.</p>	<p>A DPIA should also be carried out for CCTV- the DPO will help with this.</p> <p>The policy contains several useful annexes which should be used if you have CCTV.</p>

<p>Special Category Data Policy also known as Appropriate Policy Document.</p> <p>Statutory (ICO)</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO team produce an updated template each April.</p>	<p>You must have this policy as you will process some special category data. The DPO will lead on any amendments needed to this document (you shouldn't need to make any amendments yourself- if you think you do, please ask the DPO for advice).</p>
<p>Biometric Information Policy for schools using fingerprint or facial recognition.</p> <p>Statutory (DfE)</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO team produce an updated template each April.</p>	<p>A DPIA will be required before engaging with any of these.</p>
<p>Artificial Intelligence Policy a guidance document is also available</p> <p>Recommended (DPO)</p>	<p>EDH Data Protection Policy Suite</p>	<p>The EDH DPO team produce an updated template each April.</p>	
<p>Online Safety Policy</p>	<p>EDH Cyber Policy Suite</p>		

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