



Statement of Intent

Mill Hill Primary School

GDPR – Statement of Intent in respect of GDPR and the Data Protection Officer role

1. The Governing Body of Mill Hill Primary School understands that it is a Data Controller for the purposes of GDPR. It is also a Public Authority for GDPR purposes.
2. As the Governing Body of Mill Hill Primary School is a public authority it has appointed Ms. Elaine Rapley as Data Protection Officer (DPO), in order to comply with the requirements of the GDPR.
3. The high-level roles and responsibilities within Mill Hill Primary School in respect of GDPR compliance are as follows:
 - a. The Governing Body – is the Data Controller and has overall responsibility for the school's data ecosystem, policies and compliance with GDPR;
 - b. The Headteacher – is the school's senior leader and is responsible on a day-to-day basis for overall GDPR compliance on behalf of the Governing Body;
 - c. The DPO is responsible for supporting the Headteacher and Governing Body to ensure compliance by undertaking the tasks set out in this document.
4. Our DPO is tasked with:
 - monitoring the school's compliance with the GDPR, other data protection laws, and the school's data protection policies;
 - awareness-raising amongst staff and Governors within the School about data protection obligations;
 - training of staff and Governors on data protection;
 - audits in the school in respect of compliance with data protection obligations.
5. Our DPO shall report to the Headteacher and will also have direct access to report to the Governing Body for the purposes of their DPO role.
6. The Governing Body and Headteacher recognise, agree and will seek to ensure that our DPO is given the required independence to perform their tasks. The Governing Body and Headteacher shall ensure that staff and Governors involve our DPO, in a timely manner, in all issues relating to the protection of personal data.

7. In particular, the Governing Body and Headteacher shall ensure that:

- the school's DPO is sufficiently well resourced and supported to be able to perform their tasks; including the time and resource required to acquire expertise and experience in the field of data protection as necessary
- the school does not penalise the DPO for performing their duties;
- any other tasks or duties assigned to our DPO do not result in a conflict of interests with their role as a DPO;
- staff and Governors take account of our DPO's advice and the information they provide on data protection obligations;
- when carrying out a Data Protection Impact Assessment, staff seek the advice of the DPO, who also monitors the process;
- the school's DPO acts as a contact point for the ICO and will co-operate with the ICO;
- when performing their tasks, the school's DPO shall have due regard to the risk associated with processing operations, and will take into account the nature, scope, context and purposes of processing data within the school.

This statement was agreed and adopted by the Governing Body and Headteacher on 13th July 2026.

It will be reviewed, along with all other data protection documents, at least every 2 years.

Date of next review: June 2028