



St Catherine's C of E School

Executive Headteacher: Mrs Louise Hussey Head of School: Ms Pippa Warner
Telephone: 01566 772198 Email: stcatherines@andaras.org Website: www.stcatherinescofe.co.uk

Role Description

Data Protection Officer (DPO)

Version: 2.3 | Date: May 2026

General information

Field	Details
Contract type	SLA contract to iCT4 Limited
Location	An Daras MAT
Reporting to	MAT CEO
Responsible for	Data Protection Representatives (DPRs)
Budget responsibilities	None

Purpose

The DPO is responsible for monitoring compliance with current UK data protection law, and has the knowledge, support and authority to do so effectively. They oversee the school's/academy's/MAT's/Federation's data protection processes and advise on best practice.

The DPO's responsibilities are governed by the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), and the Data (Use and Access) Act 2025 (DUAA 2025).

Key responsibilities

- To advise the school/academy/MAT/Federation and its employees about their obligations under current UK data protection law, including the UK GDPR, DPA 2018, and the Data (Use and Access) Act 2025 (DUAA 2025).
- To maintain sufficient awareness of the school's/academy's/MAT's/Federation's processing activities, information systems and data security arrangements to enable the provision of effective data protection advice, without taking operational ownership of those systems or processes.
- To monitor compliance with UK data protection law, including DUAA 2025, by:
 - collecting information to identify data processing activities;
 - analysing and checking the compliance of data processing activities;
 - informing, advising and issuing recommendations to the school/academy/MAT/Federation;
 - ensuring they remain an expert in data protection issues and changes to the law, attending relevant training as appropriate.
- To ensure the school/academy/MAT/Federation policies are followed, through:
 - assigning responsibilities to individuals;
 - awareness-raising activities;
 - co-ordinating staff training;
 - conducting internal data protection audits.
- To ensure the school's/academy's/MAT's/Federation's statutory data protection complaints procedure, required under the Data (Use and Access) Act 2025, is in place and operating correctly. Day-to-day receipt

and handling of complaints may be carried out by the Trust Governance Officer, Operations Team or designated school/academy staff; the DPO's responsibilities in relation to this procedure are limited to:

- advising on the design and implementation of the procedure to ensure it meets statutory requirements;
- acting as an escalation point for data protection-specific or complex complaints referred by the complaints handler;
- verifying that complaints are acknowledged within 30 days and resolved without undue delay;
- reviewing patterns or recurring issues identified through the complaints process and advising the Board accordingly.
- To advise on and assist the school/academy/MAT/Federation with carrying out data protection impact assessments (DPIAs), if necessary.
- To act as a contact point for the Information Commissioner's Office (ICO), assisting and consulting it where necessary, including:
 - helping the ICO to access documents and information;
 - seeking advice on data protection issues.
- To support the DPR as a contact point for dealing with individuals whose data is processed (for example, staff, pupils and parents), including:
 - supporting the DPR in responding to subject access requests, ensuring the reasonable and proportionate search standard and clock-pause provisions under the DUAA 2025 are applied correctly;
 - supporting the DPR in responding to other requests regarding individuals' rights over their data and how it is used.
- To take a risk-based approach to data protection, including:
 - prioritising the higher-risk areas of data protection and focusing mostly on these;
 - advising the school/academy/MAT/Federation if/when it should conduct an audit, which areas staff need training in, and what the DPO role should involve.
- To advise the school/academy/MAT/Federation on when the 'recognised legitimate interests' basis (introduced by the DUAA 2025) can be applied to data processing activities, particularly in safeguarding, emergency response, and crime prevention contexts.
- To advise on and oversee any use of automated decision making or AI-powered tools that may affect staff, pupils or other data subjects, ensuring appropriate safeguards and transparency obligations are met.
- To ensure that when the school/academy/MAT/Federation procures or approves online services for use by pupils, those services meet the children's higher data protection requirements set out in the Data (Use and Access) Act 2025.
- To report to the board of trustees on the school/academy/MAT/Federation's data protection compliance and associated risks.
- To respect and uphold confidentiality, as appropriate and in line with UK data protection law, in carrying out all duties of the role.
- To take responsibility for fostering a culture of data protection throughout the school/academy/MAT/Federation.
- To work closely with other departments and services, such as HR, legal, IT and security, to ensure compliance with UK data protection law.
- To undertake any additional tasks necessary to keep the school/academy/MAT/Federation compliant with UK data protection law and to be successful in the role.

Person specification

Criteria	Desirable qualities
Qualifications	• Background in information security, data protection or IT desired. • Educated to degree level, or equivalent professional experience. • Relevant data protection qualification desired.
Experience	• Professional experience of UK data protection law. • Experience of managing data protection compliance, particularly responding to subject access requests.
Skills and knowledge	• Knowledge of UK data protection law (UK GDPR, Data Protection Act 2018, and the Data (Use and Access) Act 2025). • Knowledge of information security and data processing principles and good practice. • An understanding and prior experience of the following systems: ○ School MIS ○ Finance systems such as FMS/PS Financials ○ Microsoft tenancies
Personal qualities	• Detail oriented. • Able to work under pressure. • Able to prioritise tasks effectively. • Able to work independently and autonomously with minimal supervision. • Commitment to maintaining confidentiality at all times.