



# Data Protection Policy

## 2025 - 2026

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**Date Approved:** August 2022  
**Review Date:** August 2025  
**Next Review Date:** August 2026

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**Approved by:** Corrine Scott  
**Position:** Head of Provision

## Introduction

REACH Learning Provision collects and processes personal data about students, parents/carers, staff, and visitors. This policy explains how we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, ensuring that all data is handled securely, lawfully, and transparently.

This policy applies to all personal data, whether held electronically or in paper records, and includes work produced by students during education sessions.

## Purpose

The purpose of this policy is to:

- Protect the rights and privacy of individuals whose data we hold
- Ensure data is collected and used lawfully, fairly, and transparently
- Define roles and responsibilities for data handling within REACH
- Provide clear procedures for retention, security, breaches, and subject access requests
- Demonstrate compliance with UK GDPR and Data Protection Act 2018

## Legal Framework

This policy is based on:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Education Acts and statutory safeguarding guidance

## Principles of Data Processing

REACH processes personal data according to the following principles:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Retained no longer than necessary
6. Secure, with integrity and confidentiality maintained
7. Accountable – REACH takes responsibility for compliance

## Lawful Basis for Processing

We process personal data under the following lawful bases (Article 6 UK GDPR):

- **Legal obligation** – compliance with the law (e.g. safeguarding, attendance registers)
- **Public task** – delivering education in the public interest
- **Contract** – employment contracts with staff
- **Consent** – for optional activities such as photographs, media use, or non-essential communications

For special category data (e.g. health, ethnicity, safeguarding), we process under Article 9 UK GDPR where necessary for reasons of substantial public interest.

## Roles & Responsibilities

### Data Protection Officer (DPO)

REACH has appointed a DPO/Data Protection Lead – Corrine Scott (Head of Provision) to:

- Monitor compliance with UK GDPR and this policy
- Advise staff on responsibilities
- Handle subject access requests and data breaches
- Act as the point of contact with the Information Commissioner's Office (ICO)

### Senior Leadership Team

- Ensure this policy is implemented and resourced
- Oversee data protection training and compliance

### Staff

- Follow this policy and only access data needed for their role
- Keep data secure at all times
- Report any data breaches immediately

### Students & Parents/Carers

- Have rights over their personal data, which REACH respects and upholds

## Data Security

REACH Learning Provision use encryption email provided by Zivver. More information on Zivver can be found [here](#). This means that any information shared between a commissioning school and ourselves is completely safe and secure

Zivver is a fully compliant company and take data privacy very seriously. We are very happy to have found it partner who shares our same views on keeping people's personal data safe.

To make sure that we are also GDPR complaint in taking visitor's details, we use a GDPR certified logging in book which keeps visitors details private and confidential.

When access to computers is required for repair REACH Learning Provision will only use reputable firms, commissioned through official procurement processes, and will seek assurance of the security of data during and after the access period.

Where access to personal data of any kind is granted to any external agency for example external agencies delivering education to young people, a confidentiality statement will be signed by the external agency to always ensure compliance with pupil confidentiality and the safeguarding of young people.

Paper records are held in lockable cabinets to prevent unauthorised access and only kept for the necessary period

All staff have individual passwords and restricted access to data dependent on roles and responsibilities to ensure data is accessed appropriately.

## Rights of Data Subjects

Individuals have the right to:

- **Access** – request copies of their data (subject access request)
- **Rectification** – correct inaccurate or incomplete data
- **Erasure** – request deletion of data in certain circumstances
- **Restriction** – limit how their data is used
- **Portability** – request data is transferred electronically (where applicable)
- **Object** – stop data being used for certain purposes
- **Automated decision-making** – protection against significant decisions made solely by automated means

Requests will be handled within **one calendar month**.

## Data Retention

Data will not be retained longer than necessary.

## Data Breaches

A personal data breach is any security incident leading to:

- Loss, destruction, or unauthorised disclosure of personal data

In the event of a breach:

1. Report immediately to the DPO/Responsible Officer
2. The DPO will investigate and assess risk
3. If required, report to the ICO within **72 hours**
4. Inform affected individuals if the breach poses a high risk to their rights and freedoms
5. Record the incident and actions taken in the **Data Breach Log**

## Subject Access Requests

- Requests must be made in writing to the DPO/Responsible Officer
- Identity verification will be required before release
- Responses provided within **one calendar month**
- No fee will be charged unless requests are excessive or repeated

## Monitoring & Review

- This policy will be reviewed annually or sooner if legislation changes
- Compliance will be monitored through audits and staff training
- Any updates will be communicated to staff, students, and parents/carers

## Conclusion

REACH Learning Provision is committed to protecting the privacy and rights of all individuals. By following this policy, we ensure that personal data is handled responsibly, transparently, and securely, supporting trust and safeguarding responsibilities.