

Data Protection and Privacy Policy

1. Purpose

This policy sets out how Liminal Education East Anglia Ltd collects, uses, stores and shares personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It is designed to protect the privacy of pupils, parents/carers, staff, commissioners (e.g. schools, local authorities), and visitors.

2. Principles

We are committed to protecting personal data and will ensure that it is:

- Processed lawfully, fairly and transparently.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and, where necessary, kept up to date.
- Stored securely and retained only as long as necessary.
- Processed in a manner that ensures appropriate security.

3. Personal Data We Collect

We may collect and process the following types of information:

- Pupil data – names, dates of birth, contact details, educational information, attendance, safeguarding and wellbeing records.
- Parent/carer data – names, contact details, emergency contacts.
- Staff/volunteer data – names, contact details, references, employment details, DBS checks.
- Commissioner data – contact details of schools/local authority representatives.
- Other data – visitors' details for safeguarding and health & safety.

4. Lawful Bases for Processing

We process personal data under the following lawful bases (as defined by UK GDPR):

- Consent – where individuals have given clear consent.
- Contract – where data processing is necessary for a contract with commissioners or staff.
- Legal obligation – where required to comply with the law (e.g. safeguarding).
- Vital interests – to protect someone's life.
- Public task – where processing is necessary to perform a task in the public interest.
- Legitimate interests – where processing is necessary for the provision's legitimate activities and does not override the rights of individuals.

5. How We Use Personal Data

We use personal data to:

- Deliver education and support to pupils.
- Safeguard pupils and meet our statutory duties.
- Communicate with parents/carers, schools, and local authorities.
- Manage staff and volunteers.

- Monitor attendance, progress, and outcomes.
- Ensure health, safety, and security.

6. Sharing Personal Data

We may share information with:

- Commissioners (schools/local authorities) for placement, monitoring and safeguarding.
- Other professionals/agencies involved in a pupil's care or education.
- Regulatory or statutory bodies if required by law.

We will not share personal data with third parties for marketing purposes.

7. Data Security

We keep personal data secure by:

- Using password-protected systems and secure storage.
- Restricting access to authorised staff only.
- Training staff on confidentiality and data protection.
- Reporting and investigating any data breaches in line with legal requirements.

8. Data Retention

Personal data will only be kept for as long as is necessary to fulfil the purpose for which it was collected, or as required by law.

- Pupil records are normally retained for the duration of placement and a set period afterwards (2 years).
- Safeguarding records are retained in line with statutory guidance.
- Staff/volunteer records are retained for the duration of employment/engagement and a reasonable period afterwards.

9. Rights of Individuals

Individuals have the right to:

- Be informed about how their data is used.
- Request access to their data.
- Request correction of inaccurate data.
- Request deletion of data (where lawful).
- Restrict or object to processing.
- Data portability (in some cases).

Requests should be made in writing to the Data Protection Lead.

10. Data Protection Lead

The provision's Data Protection Lead (DPL) is responsible for overseeing this policy.

- Data Protection Lead: **Richard Henwood** (Head of Centre)
- Contact: richardhenwood@liminalcic.org.uk

11. Policy Review

This policy will be reviewed annually or sooner if required by changes in legislation or practice.

Approved by: *Richard Henwood* (Head of Centre)

Date: 01/09/25

Next Review: September 2026