

IMPACT ALTERNATIVE LEARNING
DATA PROTECTION POLICY
FINAL – OFSTED / ICO COMPLIANT VERSION

Reviewed: April 2026 | Next Review: April 2027

1. INTRODUCTION

This policy outlines how Impact Alternative Learning processes and protects personal data in line with UK GDPR and the Data Protection Act 2018.

Data protection is embedded within safeguarding due to the vulnerable nature of pupils with EHCPs.

2. STATUTORY FRAMEWORK

UK GDPR (2016/679), Data Protection Act 2018, PECR, KCSIE 2025.

3. DEFINITIONS

Personal Data: Any identifiable information.

Special Category Data: Sensitive data including health and safeguarding.

Data Controller: Impact Alternative Learning.

4. PRINCIPLES

Lawfulness, fairness, transparency.

Purpose limitation.

Data minimisation.

Accuracy.

Storage limitation.

Integrity and confidentiality.

Accountability.

5. DATA HELD

Student, staff and operational data including EHCPs, safeguarding, attendance and HR.

6. LAWFUL BASIS

Legal obligation, public task, vital interests and consent.

7. ROLES & RESPONSIBILITIES

Principal/DSL: Overall responsibility.

Staff: Follow procedures.

IT: Maintain secure systems.

8. DATA SECURITY

Encrypted systems, password protection, locked storage.

No personal data on personal devices.

9. DATA SHARING

Shared only where necessary with LA, safeguarding partners and exam bodies.

All sharing must be secure and logged.

10. SAFEGUARDING

Safeguarding overrides confidentiality where risk of harm exists.

11. RETENTION

Safeguarding records retained until age 25.

Staff and operational records retained in line with statutory guidance.

12. DATA BREACH PROCEDURE

Immediate reporting to DSL.

Containment and risk assessment.

ICO notified within 72 hours if required.

All breaches recorded.

13. DATA SUBJECT RIGHTS

Right to access, rectify, erase, restrict and object.

SARs responded to within 1 month.

14. TRAINING

All staff receive annual data protection training.

15. MONITORING & REVIEW

Policy reviewed annually.

Audits conducted regularly.

APPENDIX 2 – SAR REQUEST FORM

Name:

Request details:

Signature: