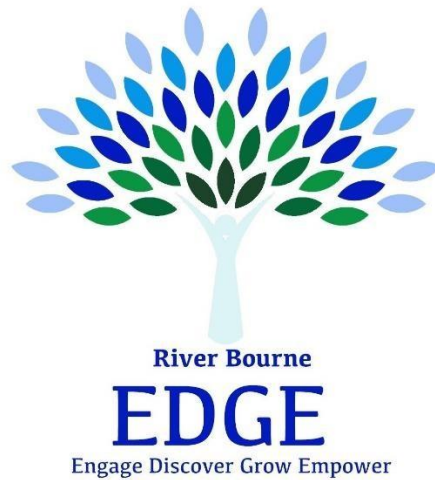




River Bourne Edge Alternative Provision

Data Protection Policy

Policy Owner: Head of Provision
Approved by: Senior Leadership Team
Policy Date: July 2026
Review Date: July 2027

1. Policy Statement

The River Bourne Edge is committed to protecting the privacy and personal information of all students, parents, carers, staff, volunteers, governors, contractors and visitors.

We recognise that personal information must be handled lawfully, fairly and securely. This policy explains how The River Bourne Edge collects, stores, uses, shares and disposes of personal data in accordance with current data protection legislation.

All members of staff have a responsibility to ensure that personal information is processed appropriately, kept secure and only accessed when necessary for their role.

Failure to comply with this policy may result in disciplinary action and, where appropriate, legal consequences.

2. Purpose

The purpose of this policy is to ensure that The River Bourne Edge:

- complies with UK data protection legislation;
- protects the rights and privacy of individuals;
- maintains the confidentiality, integrity and availability of personal information;
- promotes good practice in the handling of personal data;
- provides clear guidance to staff regarding their responsibilities;
- supports a culture of accountability and information security.

3. Scope

This policy applies to all personal information processed by The River Bourne Edge, including information relating to:

- students
- parents and carers
- staff
- volunteers
- governors/directors
- contractors
- visitors
- applicants for employment
- external professionals and partner organisations.

It applies to information held electronically, on paper, photographs, video recordings and any other format containing personal information.

4. Legislation and Guidance

This policy has been developed in accordance with current legislation and guidance, including:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025 (where applicable)
- Freedom of Information Act 2000
- Education (Pupil Information) (England) Regulations 2005 (as amended)

- Keeping Children Safe in Education (current edition)
- Information Commissioner's Office (ICO) guidance
- Department for Education guidance relating to data protection in schools and alternative provision.

The River Bourne Edge will review this policy whenever there are significant changes to legislation or guidance.

5. Key Definitions

Personal Data

Personal data is any information relating to an identified or identifiable living person.

Examples include:

- name
- address
- date of birth
- email address
- telephone number
- photographs
- attendance information
- educational records
- financial information
- online identifiers.

Special Category Data

Special category data is more sensitive information requiring additional protection.

This includes information relating to:

- racial or ethnic origin
- religious or philosophical beliefs
- political opinions
- trade union membership
- genetic data
- biometric data used for identification
- physical or mental health
- sexual orientation or sex life.

Criminal Offence Data

This includes information relating to criminal convictions, allegations, cautions or offences and is processed only where there is a lawful basis to do so.

Processing

Processing includes any activity involving personal information, including:

- collecting
- recording
- storing

- organising
- adapting
- retrieving
- sharing
- using
- deleting
- securely destroying data.

Data Subject

A data subject is the individual whose personal information is being processed.

Data Controller

The River Bourne Edge acts as the Data Controller for the personal information it processes and is responsible for ensuring compliance with UK GDPR.

Data Processor

A Data Processor is an organisation or individual who processes personal information on behalf of The River Bourne Edge under a formal agreement.

Examples include secure cloud-based management information systems, payroll providers and IT support providers.

Personal Data Breach

A personal data breach is any accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to, personal information.

Examples include:

- sending confidential emails to the wrong recipient
- losing paperwork containing personal information
- theft of equipment
- unauthorised access to records
- cyber-attacks
- accidental disclosure of confidential information.

All suspected breaches must be reported immediately in accordance with The River Bourne Edge's Data Breach Procedures.

6. Our Commitment

The River Bourne Edge is committed to ensuring that personal information is:

- processed lawfully, fairly and transparently;
- collected only for legitimate educational and business purposes;
- accurate and kept up to date;
- stored securely;
- retained only for as long as necessary;
- protected against unauthorised access, loss or misuse;
- processed in a way that respects the rights and freedoms of individuals.

We recognise that good data protection supports safeguarding, protects individual privacy and helps maintain the trust of students, families, staff and partner organisations.

7. Data Protection Principles

The River Bourne Edge processes personal information in accordance with the **seven principles of the UK General Data Protection Regulation (UK GDPR)**.

1. Lawfulness, Fairness and Transparency

Personal information will only be processed where there is a lawful basis to do so. Individuals will be informed about how their information is collected, used, stored and shared through appropriate privacy notices.

The River Bourne Edge will ensure that all processing is fair, transparent and proportionate.

2. Purpose Limitation

Personal information will only be collected for specified, explicit and legitimate purposes.

Information will not be used for purposes that are incompatible with the original reason for collection unless there is a lawful basis for doing so.

3. Data Minimisation

Only the personal information necessary to fulfil a specific purpose will be collected and processed.

Staff must ensure that unnecessary or excessive information is not requested, recorded or retained.

4. Accuracy

The River Bourne Edge will take reasonable steps to ensure that personal information is accurate and kept up to date.

Individuals are encouraged to notify us promptly of any changes to their personal information.

Where inaccuracies are identified, they will be corrected without unnecessary delay.

5. Storage Limitation

Personal information will only be retained for as long as necessary to fulfil the purpose for which it was collected or to meet legal and regulatory requirements.

Records will be securely destroyed when they are no longer required, in accordance with the organisation's Retention Schedule.

6. Integrity and Confidentiality (Security)

Appropriate technical and organisational measures will be implemented to protect personal information against:

- unauthorised access
- accidental loss
- destruction
- alteration
- disclosure
- misuse.

Personal information will be stored securely, whether held electronically or in paper format.

7. Accountability

The River Bourne Edge is responsible for demonstrating compliance with UK GDPR.

We will maintain appropriate policies, procedures, training and monitoring arrangements to ensure personal information is managed responsibly.

8. Roles and Responsibilities

Senior Leadership Team

The Senior Leadership Team has overall responsibility for ensuring that The River Bourne Edge complies with data protection legislation.

Senior leaders will:

- promote good information governance;
- ensure appropriate policies and procedures are in place;
- allocate sufficient resources to maintain compliance;
- support staff through training and guidance;
- ensure data protection risks are appropriately managed.

Data Protection Officer (DPO)

The designated Data Protection Officer (or external DPO where appointed) is responsible for:

- advising on compliance with UK GDPR;
- monitoring data protection practices;
- supporting investigations into data breaches;
- advising on data protection impact assessments where required;
- overseeing Subject Access Requests;
- acting as the main point of contact with the Information Commissioner's Office (ICO).

Managers

Managers are responsible for ensuring that staff within their teams:

- understand this policy;
- follow agreed procedures;
- receive appropriate training;
- report concerns promptly;
- process personal information appropriately.

All Staff

Every member of staff has a personal responsibility to protect confidential information.

Staff must:

- only access information needed to perform their role;
- keep passwords secure and confidential;
- lock computers when unattended;
- store paper records securely;
- use approved systems for recording information;
- ensure emails containing sensitive information are sent securely;
- verify recipients before sending confidential information;
- keep desks and workspaces clear of confidential information where possible;
- report suspected data breaches immediately;
- complete mandatory data protection training.

Staff must not:

- access records without a legitimate reason;
- share passwords;
- remove confidential information unless authorised;
- use personal devices to store confidential information unless specifically approved;
- disclose personal information to unauthorised individuals.

Failure to comply with this policy may result in disciplinary action.

9. Lawful Processing

The River Bourne Edge processes personal information only where there is a lawful basis under UK GDPR.

In most circumstances, personal information is processed because it is necessary:

- to fulfil legal obligations;
- to carry out tasks in the public interest;
- to fulfil contractual obligations;
- to protect vital interests;
- where consent has been obtained where required.

Where Special Category Data is processed, an additional lawful condition under the Data Protection Act 2018 will also apply.

10. Privacy Notices

The River Bourne Edge provides clear Privacy Notices explaining:

- what information is collected;
- why it is collected;
- how it will be used;
- who it may be shared with;
- how long it will be retained;
- individuals' rights under UK GDPR;
- how concerns or complaints may be raised.

Privacy Notices will be reviewed regularly and updated whenever significant changes occur.

11. Information Sharing

The River Bourne Edge recognises that sharing information appropriately is essential for safeguarding children, supporting education and meeting legal responsibilities.

Personal information will only be shared:

- where there is a lawful basis;
- where safeguarding requires information sharing;
- where there is a statutory duty;
- where consent has been obtained, where appropriate.

Information will always be shared securely and only with those who have a legitimate need to know.

12. Information Security

The River Bourne Edge is committed to protecting all personal information against accidental loss, unauthorised access, misuse, alteration or disclosure.

Appropriate physical, electronic and organisational security measures will be implemented to safeguard personal information.

These include:

- password-protected devices and systems;
- secure cloud-based storage;
- encrypted devices where appropriate;
- secure filing cabinets for paper records;
- controlled access to confidential information;
- regular software updates and security patches;
- secure disposal of confidential waste;
- staff training on information security.

Access to personal information will be restricted to those who require it to carry out their professional duties.

13. Electronic Systems and Third-Party Providers

The River Bourne Edge uses a range of secure electronic systems to support education and business operations.

Where third-party organisations process personal information on our behalf, appropriate contracts and Data Processing Agreements will be in place to ensure compliance with UK GDPR.

Reasonable steps will be taken to ensure all providers maintain appropriate levels of security and confidentiality.

Examples may include:

- Management Information Systems
- Microsoft 365
- Secure email services
- Payroll providers
- HR systems
- Finance systems
- Educational software
- Online learning platforms

14. Data Breaches

A personal data breach is any incident that results in the accidental or unlawful loss, destruction, alteration, unauthorised disclosure of or access to personal information.

Examples include:

- emails sent to the wrong recipient;
- lost or stolen paperwork;
- lost laptops, mobile phones or memory sticks containing personal information;
- cyber-attacks or ransomware;
- unauthorised access to confidential records;
- accidental disclosure of confidential information.

Any member of staff who becomes aware of a suspected data breach must report it **immediately** to their line manager and the Data Protection Officer (or nominated senior leader).

The River Bourne Edge will:

- investigate all reported breaches;
- take immediate action to minimise any risks;
- record all breaches appropriately;
- notify affected individuals where required;
- report breaches to the Information Commissioner's Office (ICO) within the required timescales where legally necessary.

Failure to report a suspected breach promptly may place individuals and the organisation at unnecessary risk.

15. Individual Rights

Under UK GDPR, individuals have a number of rights regarding their personal information.

These include the right to:

- be informed about how their information is used;
- request access to their personal information;
- request correction of inaccurate information;
- request erasure where appropriate;
- request restriction of processing in certain circumstances;
- object to certain types of processing;
- request the transfer of their data where applicable;
- challenge decisions made solely by automated processing where relevant.

The River Bourne Edge will respond to requests in accordance with UK GDPR and ICO guidance.

16. Subject Access Requests

Individuals have the right to request access to the personal information held about them.

Subject Access Requests (SARs) may be made verbally or in writing.

Any member of staff receiving a request must forward it to the Data Protection Officer or senior leader **immediately**, and no later than the next working day.

The River Bourne Edge will normally respond within **one calendar month**, unless an extension is permitted under UK GDPR.

Where requests involve children or young people, consideration will be given to:

- the child's level of understanding;
- parental responsibility;
- the best interests of the child;
- safeguarding considerations;
- the rights of third parties.

Information may be withheld where legislation permits, for example where disclosure could place an individual at risk of harm or prejudice an ongoing investigation.

17. Confidentiality

Staff are expected to maintain confidentiality at all times.

Confidential information must only be shared:

- where there is a legitimate professional reason;
- with authorised individuals;
- in accordance with safeguarding responsibilities;
- where required by law.

Conversations involving confidential information should take place in appropriate locations where they cannot be overheard by unauthorised individuals.

Staff must never discuss confidential information in public areas or on social media.

18. Records Management and Retention

The River Bourne Edge will only retain personal information for as long as necessary.

Records will be managed in accordance with our Records Retention Schedule and recognised education sector guidance.

When records are no longer required they will be disposed of securely.

Examples include:

- confidential shredding of paper records;
- secure deletion of electronic files;
- permanent destruction of storage devices where appropriate.

The River Bourne Edge will ensure that confidential information cannot be reconstructed or accessed following disposal.

19. Training and Awareness

All staff are responsible for protecting personal information.

The River Bourne Edge will ensure staff receive appropriate training and guidance relating to:

- UK GDPR;
- confidentiality;
- cyber security;
- recognising and reporting data breaches;
- secure handling of information;
- information sharing and safeguarding responsibilities.

Training will be provided during induction and refreshed periodically to ensure compliance with current legislation and best practice.

20. Complaints

The River Bourne Edge is committed to handling personal information fairly, lawfully and transparently.

Anyone who has concerns about how their personal information has been collected, processed or shared should raise these concerns with the Head of Provision or the Data Protection Officer in the first instance.

Complaints will be investigated promptly and dealt with in accordance with The River Bourne Edge Complaints Policy.

If an individual remains dissatisfied after the internal complaints process has been completed, they have the right to make a complaint to the **Information Commissioner's Office (ICO)**.

21. Monitoring and Compliance

The River Bourne Edge will regularly monitor compliance with this policy to ensure that personal information continues to be managed safely and securely.

Monitoring may include:

- periodic audits of information security;
- reviews of record keeping;
- monitoring compliance with retention schedules;
- reviewing reported data breaches;
- reviewing Subject Access Requests;
- evaluating staff training and awareness.

Where improvements are identified, appropriate action will be taken to strengthen data protection arrangements.

22. Policy Review

This policy will be reviewed:

- annually;
- following significant changes to legislation or ICO guidance;
- following any significant data breach;
- where operational changes require amendments.

The review will be undertaken by the Head of Provision in consultation with the Data Protection Officer.

23. Related Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- Online Safety Policy
- Health and Safety Policy
- Behaviour Policy
- Staff Code of Conduct
- Acceptable Use of IT Policy
- Records Retention Schedule
- CCTV Policy (where applicable)
- Privacy Notices
- Complaints Policy

24. Equality Statement

The River Bourne Edge is committed to ensuring that this policy is applied fairly, consistently and without discrimination.

We are committed to promoting equality, diversity and inclusion and will make reasonable adjustments where required to ensure that individuals are able to exercise their rights under data protection legislation.

25. Policy Summary

At The River Bourne Edge, protecting personal information is everyone's responsibility.

We are committed to ensuring that information is:

- collected lawfully;
- used fairly;
- kept accurate;
- stored securely;
- shared appropriately;
- retained only for as long as necessary;
- disposed of safely when no longer required.

By following this policy, all staff contribute to protecting the privacy, safety and rights of our students, families, colleagues and partner organisations.

Useful Contacts

Head of Provision

The River Bourne Edge

Data Protection Officer (DPO)

(Insert appointed DPO details)

Information Commissioner's Office (ICO)

Website: <https://ico.org.uk>

Telephone: **0303 123 1113**