

Privacy Policy

The official business name of my company is Dan Vockins Coach, and it will be referred to as this throughout.

1. Aims

Dan Vockins Coach takes data protection very seriously. As such, this policy outlines the measures the business will put in place to ensure the protection of all personal and sensitive data about pupils, clients and all other individuals.

2. Legislation and Guidance

General Data Protection Regulation (GDPR) came into force in May 2018 as part of the Data Protection Act 2018 (DPA 2018) which replaces the previous Data Protection Act 1998. GDPR relates to the collection, processing and storage of personal data. This policy is based on guidance published by the Information Commissioner’s Office (ICO) and the ICO’s code of practice for subject access requests.

3. Definitions

Throughout this policy, the following terminology with the accompanying definitions will be used.

Terminology	Definition
processing	Any action or operation performed on personal data, such as, collecting, recording, storing, altering, using, transmitting, destroying or erasing. Processing also includes transferring personal data to third parties.
data subject	Any person about whom we hold personal data. In the case of the school this could relate to pupils, parents, staff, governors, volunteers and visitors.
personal data	Any information that relates to an identified or identifiable (either directly or indirectly), person or data subject.
sensitive data	Relates to a set of special categories that should be treated with extra security. These categories are: <ul style="list-style-type: none"> • Racial or Ethnic Origin Data • Political Opinions • Religious or Philosophical Beliefs • Trade Union Membership • Genetic Data • Biometric Data

data controller	Any person, agency or authority who decides how and why data is processed. In the case of this policy the school is the data controller.
data processor	Any person, agency or authority that processes data on behalf of a data controller.
data protection officer (DPO)	The person responsible for independent and impartial monitoring and application of laws that protect personal data within the school.
data breach	A breach of security that leads to the accidental or unlawful loss, destruction, alteration, disclosure of or access to personal data while stored, transmitted or being processed must be reported to the Information Commissioner's Office (ICO).
Information Commissioner's Office (ICO)	A UK based organisation responsible for upholding information rights.
data users	Those who process personal data. They must protect data in accordance with this data protection policy.
data	Information which is stored electronically, on a computer, or in certain paper-based filing systems.

4. Data Protection Principles

The data protection principles that the company must follow in order to be compliant with GDPR state that personal data must be:

- processed lawfully, fairly and in a transparent manner;
- collected for legitimate purposes;
- relevant and limited to what is necessary in order to fulfil the purposes for which it is processed;
- kept up to date;

- stored for no longer than is necessary;
- processed in a way that ensures it is appropriately secure.

This policy outlines how the company will comply with these principles.

5. Collecting Personal Data

Collecting personal data will be an inevitable part of the day-to-day business of Dan Vockins Coach. We will only collect personal data for specific, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

6. Sharing Personal Data

As with the collection of personal data, it is integral to the effective functioning of Dan Vockins Coach that personal data will need to be shared in certain circumstances. To ensure that personal data is shared lawfully, the following considerations must be taken into account.

Scenario	Procedure
Regulatory Bodies e.g. government agencies or healthcare	Before sharing personal data with regulatory bodies requesting access, the DPO will verify the identity of the body and investigate how they intend to use the data shared with them. Only when satisfied with the response will Moss Tutoring LTD share any personal data.
Suppliers or Subcontractors Requiring Access to Personal Data.	The DPO will assess all suppliers and subcontractors’ ability to adhere to GDPR. All suppliers and subcontractors requiring access to personal data will read and follow the school GDPR policy.
The Police	The police will only be able to request access to data with a relevant warrant.

7. Data Retention - Security and Storage

At Dan Vockins Coach, only data that is adequate, purposeful, necessary and limited to what is essential will be stored. The company will ensure that any stored data will be protected from unauthorised access and data breaches through the implementation of up to date and well-maintained security protocols. This will guarantee the confidentiality, integrity and availability of personal data. Confidentiality means that data will only be accessed by those who are authorised to access it. The integrity will be maintained through guaranteed accuracy and suitability of all data stored; inaccurate or unsuitable data will not be retained. Availability will be maintained, meaning those that are authorised to access the personal data are able to do so as and when required.

Specific Data Type	Security Measures
paper records	All paper records stored on site will be kept in a secure and locked location. Only those authorised to access the records will be granted access to the storage location.
portable electronic devices e.g. Laptops, iPads.	All portable electronic devices will be password protected. In the case of laptops the hard drives will be encrypted.
papers containing personal data e.g. contact details Information about individual children	Any paperwork containing personal data will not be left unattended and in sight at any time. Tutors will ensure that any paper containing personal data will be suitably stored to limit access to the data.
desktop computers	All computers used in the company will be password protected and have a timed lock function when left unattended. Tutors will be required to lock their workstations when leaving them unattended at any time.
staff personal devices	Staff will not be permitted to use personal devices to access or store any personal data relating to the company.
sharing with authorised third parties	When required to share data with authorised third parties, the school and staff will make the necessary checks to guarantee it is handled securely and in line with GDPR.

8. Disposal of Data

Dan Vockins Coach will always ensure that records containing personal and/or sensitive data are disposed of safely and securely.

For example, any paper records due to be disposed of will be securely shredded, either on site, or through an approved third-party disposal service. When using a third party, it is the company's responsibility to ensure that the company guarantees the records are disposed of securely.

Any digital records containing personal data will be deleted using the internal erasure procedure of the relevant software. For example, records stored on a Windows laptop would be deleted using the Windows delete functions. It is up to individuals to make sure they have deleted personal data from devices once that data is no longer relevant, or the device is being passed on.

When disposing of sensitive personal data, the school will use a file-wiping utility to remove the sensitive personal data, preventing the possible retrieval if erased, using internal procedures.

9. Compliance Monitoring

As data collection and processing changes and updates, Dan Vockins Coach confirms continual compliance through compliance monitoring. The director of the company will, as part of their role, undertake regular monitoring of data records held by the company, checking they are relevant, necessary and accurate. The director will monitor the compliance of the roles outlined in this policy with their assigned responsibilities, impartially checking that these are carried out in accordance with policy. The director will monitor who the company is sharing data with and the integrity and necessity of the third-party data processing. The director will monitor procedures for SAR and data breaches, ensuring these are followed correctly and in a timely manner.

10. Data Breaches

At Dan Vockins Coach all reasonable action will be taken to keep data handling and processing safe and secure within GDPR. However, should a data breach occur, Dan Vockins Coach will be prepared to handle any such breach in the manner outlined below.

Dan Vockins Coach's Procedure for Handling A Data Breach

- Any potential or confirmed data breach must be reported in the first instance to the company director.
- The director will investigate the data breach further to assess the severity of the breach.
- Once the assessment has been made the outcome will be logged by the director, whether the breach does or does not need reporting. The log will include the cause of the data breach and any facts surrounding the breach, the effects of the breach and the action taken to minimise risk and prevent a repeat occurrence.
- If the director determines that the data breach poses a significant threat to the data subject(s), they will report the breach to the ICO within 72 hours.
- The director will attempt to minimise the impact of the breach, supported by relevant parties within the school.
- Upon receiving the ICO report, the director will act upon the ICO's recommendation.