

Data Protection and Confidentiality Policy

Community PRAXIS

**Community PRAXIS
Responsible Person /
Data Protection Officer (DPO)**

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1. Data protection principles

Community PRAXIS is committed to processing data in accordance with its responsibilities under the GDPR and complying with the data protection laws and maintaining the confidentiality of personal and sensitive information. This includes compliance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

2. Scope

This policy applies to all employees, contractors, subcontractor and volunteers who access or process personal or confidential information on behalf of Community PRAXIS.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

3. General provisions

- a. This policy applies to all personal data processed by PRAXIS.
- b. The Responsible Person shall take responsibility for the PRAXIS's ongoing compliance with this policy.
- c. Community PRAXIS shall register with the Information Commissioner's Office as an organisation that

processes personal data annually

4. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, PRAXIS shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to PRAXIS shall be dealt with in a timely manner.

5. Lawful purposes

- a. All data processed by PRAXIS must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. Community PRAXIS shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in PRAXIS's systems.

6. Data minimisation

Learners' data is essential for Community PRAXIS's operational use therefore, Community PRAXIS will ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which is processed.

Community PRAXIS will inform and explain all learners and parents/carers how information about our learners is used. The categories of pupil/learners information that we process include:

- a. personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- b. characteristics (such as ethnicity, language...)
- c. safeguarding information (such as court orders and professional involvement)
- d. special educational needs (including the needs and ranking)
- e. medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- f. attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- g. assessment and attainment (post 16 courses enrolled for and any relevant results)
- h. behavioural information (such as exclusions and any relevant alternative provision put in place)

Community PRAXIS collect and use learners' information for the following purposes:

- to support learner's learning
- to monitor and report on learner attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for the DfE /Suffolk County Council
- to give learners and parents/carers a voice by listening to their feedback and suggestions

We collect pupil information via paper and electronic formats, this includes; registration forms, feedback forms, EHCP and other relevant documents and digital platforms as and when necessary.

Photographs/ Images / audios

Community Praxis will seek consent request from parents/carers prior to publishing any photographs, images and or audios.

7. Accuracy

- a. Community PRAXIS shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

8. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, PRAXIS shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

9. Security and confidentiality

- a. Community PRAXIS shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.
- e. Employees must keep all personal and sensitive data confidential and not disclose it to unauthorised parties.
- f. Confidential information must not be discussed in public places or shared via unsecured communication channels.
- g. Paper records must be stored in locked cabinets; digital records must be protected with secure passwords and encryption where necessary.

We do not share information about our learners with anyone without consent unless the Law and our policies allow us to do so. We may share learners' information with:

- Schools that the learners attend and will attend after leaving us
- Suffolk County Council
- Other parties as legally necessary

10. Data Subject Rights

Individuals have the right to:

- Access their data
- Request correction or deletion
- Object to processing
- Withdraw consent
- Lodge a complaint with a data protection authority

11. Training and Awareness

All employees, subcontractors and volunteers will receive regular training on data protection principles and confidentiality obligations.

12. Data Breaches

In the event of data breaches of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Community PRAXIS's DPO shall promptly assess the risk to people's rights and freedoms and report this breach to the ICO.

13. Review

This policy will be reviewed annually or when significant changes in data protection regulations occur.

14. Acknowledgement

I confirm that I have read and understood the Community PRAXIS's Data Protection and Confidentiality Policy and agree to abide by its terms.

Name: _____

Signature: _____

Date: _____