



Data Protection Policy

IMPACT: Autism Consultancy & Training Ltd is committed to protecting the privacy and rights of all individuals whose personal data we collect and process. We handle all personal information about clients, parents/carers, training participants, professionals, and any other individuals in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018 (DPA 2018)**.

This policy is informed by guidance published by the **Information Commissioner's Office (ICO)** ([GDPR](#)) and meets relevant requirements of the **Protection of Freedoms Act 2012** ([Protection of Freedoms Act 2012](#)).

1. Definitions:

Personal Data: Any information relating to an identified or identifiable person. This may include, but is not limited to:

- Name, address, email address or telephone number
- Date of birth
- Information relating to family circumstances
- Educational or professional details
- Medical or health information
- Factors relating to an individual's physical, physiological, genetic, mental, economic, cultural or social identity

Special Category Data: This is more sensitive personal data which requires additional protection. It includes information relating to an individual's:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetics
- Physical or mental health (including SEND information, allergies, medical conditions)
- Sexual orientation or sex life

Personal Data Breach: This refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. This includes breaches that occur through human error, technical failure, or malicious activity.

2. Information Collection:

2.1 Lawful Bases for Processing:

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IMPACT: Autism Consultancy & Training Ltd will only process personal data where at least one of the six lawful bases under the **UK GDPR** applies. These are:

1. **Contract** – Processing is necessary to fulfil a contract with the individual or to take steps at their request before entering into a contract.
Example: providing consultancy, assessment, training, or support that the client has commissioned.
2. **Legal Obligation** – Processing is necessary to comply with a legal requirement.
Example: maintaining financial records for HMRC.
3. **Vital Interests** – Processing is necessary to protect someone's life.
Example: sharing essential information in a medical emergency.
4. **Public Task** – Processing is necessary to carry out a task in the public interest or in the exercise of official functions.
This is rarely applicable to private consultancies and is included here for completeness.
5. **Legitimate Interests** – Processing is necessary for the legitimate interests of IMPACT: Autism Consultancy & Training Ltd or a third party, provided the individual's rights and freedoms are not overridden.
Example: storing client contact details securely to organise meetings or deliver ongoing support.
6. **Consent** – The individual (or parent/carer, where appropriate) has given clear, explicit, informed consent for a specific purpose.

2.2 How Personal Data Is Collected:

- Personal data is only collected with **explicit, informed consent** from the parent, carer, local authority, school, commissioning organisation, or the client themselves.
- Data is gathered only when it is **relevant, necessary and proportionate** for delivering consultancy, training, assessment, or support services.
- Information is collected to maintain accurate client records and to enable IMPACT: Autism Consultancy & Training Ltd to **tailor support effectively to the individual's needs**.

2.3 Data Retention:

- Personal data relating to clients and their families is **securely destroyed or permanently deleted 12 months after the completion of work**, unless there is a legal requirement to retain it for longer (e.g., financial or safeguarding records).
- Where data must be retained for statutory reasons, this will be stored securely and separately from active client records.

3. Information Disclosure:

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- IMPACT: Autism Consultancy & Training Ltd will **never** share personal data with third parties without the individual's clear consent, unless disclosure is required by law.
- Information may be shared **without consent** where necessary to:
 - Safeguard a child, young person, or vulnerable adult
 - Protect an individual's vital interests
 - Prevent a serious risk to public safety
 - Comply with a lawful request or order from a court or statutory body
- Wherever possible and lawful, individuals will be **informed in advance** if their information needs to be disclosed for safeguarding or legal reasons.
- All decisions about information sharing follow the principles outlined in the **IMPACT Safeguarding Policy** and relevant statutory guidance.

4. Subject Access Requests (SARs):

4.1 What is a Subject Access Request?

A **Subject Access Request (SAR)** allows individuals to access the personal data that IMPACT: Autism Consultancy & Training Ltd holds about them (or about a child for whom they have parental responsibility).

4.2 How a Request Can Be Made:

A SAR can be submitted:

- In writing (email or letter)
- Verbally (including phone call or face-to-face)

No specific wording is required. Any request for information about personal data will be treated as a SAR.

4.3 Response Times:

- A full response will be provided **within one calendar month** of receiving the request.
- The deadline may be extended by **up to two additional months** if the request is complex or if additional identification, clarification, or authority is required.
- If an extension is needed, the requester will be informed within the original one-month period.

4.4 Complex Requests and ICO Guidance:

For complex SARs or where clarification is required, IMPACT: Autism Consultancy & Training Ltd will follow current **ICO guidance**. External advice may be sought if needed.

4.5 If the Requester Is Dissatisfied:

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If an individual is unhappy with their SAR response:

1. They may request an **internal review**.
2. If they remain dissatisfied, they may raise a complaint with the **Information Commissioner's Office (ICO)**.

The ICO may then contact IMPACT: Autism Consultancy & Training Ltd for further information or guidance.

4.6 Record Keeping:

A record of:

- The SAR
- Any correspondence or clarification
- The final response

will be stored securely as part of our data processing documentation.

5. Revisions to This Policy:

This policy may be updated at any time to reflect:

- Changes to data protection legislation
- Updates to ICO guidance
- Changes in the services offered by IMPACT: Autism Consultancy & Training Ltd
- Improvements in best practice

All revisions will be published in the latest version of this policy document.