

1. Data Protection Policy

IMPACT: Autism Consultancy & Training is committed to protecting user privacy. All personal data collected about staff, pupils, parents, and other individuals is collected, stored and processed in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

This policy meets the requirements of the UK GDPR and the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the UK [GDPR](#). It meets the requirements of the [Protection of Freedoms Act 2012](#).

Definitions:

- **Personal data:** refers to any information which are related to an identified or identifiable person including name, address, contact number, date of birth and medical information. It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.
- **Special categories of personal data:** refers to personal data which is more sensitive and so needs more protection, including information about an individual's:
 - Racial or ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade union membership
 - Genetics
 - Health – physical or mental (Including special educational needs, allergies and/or medical conditions)
- **Personal data breach:** refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

Information Collection:

- IMPACT: Autism Consultancy & Training Ltd. will only process personal data where there is one of 6 'lawful bases' (legal reasons) to do so under data protection law:
 - The data needs to be processed so that IMPACT: Autism Consultancy & Training Ltd. can fulfil a contract with the individual.
 - The data needs to be processed so that IMPACT: Autism Consultancy & Training Ltd. can comply with a legal obligation.
 - The data needs to be processed to ensure the vital interests of the individual e.g. to protect someone's life
 - The data needs to be processed so that IMPACT: Autism Consultancy & Training Ltd. can perform a task in the public interest, and carry out its official functions
 - The data needs to be processed for the legitimate interests of IMPACT: Autism Consultancy & Training Ltd. (where the processing is not for

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any tasks IMPACT: Autism Consultancy & Training Ltd. performs) or a third party (provided the individual's rights and freedoms are not overridden).

- The individual (or their parent/ carer when appropriate in the case of a pupil) has freely given clear consent.
- Personal data is only collected and stored with written consent of a parent, carer, local authority, school or other organisation acting on the client's behalf.
- Personal data is collected for keeping up to date client information records for the sole purpose of better meeting the client's needs.
- Information about the client and their family is destroyed/deleted 12 months after completion of any work.

Information Disclosure:

- Data is not shared with any other third party without your consent, (see Safeguarding Policy), unless requested by Law.
- We may by Law have to share information in the event of safeguarding a child, young person or vulnerable adult or to protect the safety and wellbeing of the public or if summoned to do so by a Court of Law. In this instance, we would share any information that may have to be disclosed with yourself beforehand.

Subject Access Request:

- A Subject Access Request (SAR) is a type of information rights request. A SAR lets people access a copy of the personal data a company holds about them or someone they have parental responsibility for.
- Any individual whose personal data is held by IMPACT: Autism Consultancy & Training Ltd. can make a Subject Access Request. A requester can submit a SAR:
 - In writing, such as an email or letter.
 - Verbally, such as over the phone or face-to-face.
- A full SAR response will be sent to the requester within one calendar month. The SAR deadline may be extended if we require further authority, clarification or identification from the requester.
- In line with national guidance, if a complex SAR request is received the deadline may be extended and further advice will be sought from the ICO: [What should we consider when responding to a request? | ICO](#)
- If the requester is unhappy with their SAR response, IMPACT: Autism Consultancy & Training Ltd. will offer the chance for their case to be reviewed. If the requester remains dissatisfied with our response, the requester can complain to the ICO. The ICO will consider the complaint and contact IMPACT: Autism Consultancy & Training Ltd. for further information or to provide advice as appropriate.

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- A record of the SAR process and response letter will be kept on secure file by IMPACT: Autism Consultancy & Training Ltd.
- For further information see: [Data protection in schools - Dealing with subject access requests \(SARs\) - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/data-protection-in-schools-dealing-with-subject-access-requests-sars)

Revisions to the Data Protection Policy

- This Policy may be revised at any time in the response to changes in the law or other factors.