



## **Swift Learning- Data Protection (GDPR) Policy**

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## **1. Introduction**

Swift Learning is committed to protecting the privacy, dignity, and rights of all individuals whose personal data we hold. As an alternative education provider, we regularly process sensitive information about children and young people, many of whom may be particularly vulnerable. This includes pupils who have been excluded, are at risk of exclusion, are referred by schools or local authorities, or who have specific behavioural, emotional, or social needs.

We are committed to complying with the UK General Data Protection Regulation UK GDPR, the Data Protection Act 2018, and all other relevant data protection laws and best practices. This policy explains how we manage personal data securely, fairly, and transparently.

## **2. Purpose**

### **The purpose of this policy is to:**

Ensure that Swift Learning processes personal data in accordance with the law  
Protect the rights and freedoms of pupils, parents, carers, staff, referrers, and stakeholders  
Foster a culture of accountability and privacy awareness throughout the organisation  
Support transparent and lawful information handling that builds trust with service users and external partners  
Provide clarity on the processes for accessing, correcting, and managing data

This policy underpins all data-related activities at Swift Learning, including admissions, safeguarding, curriculum delivery, attendance monitoring, health and wellbeing tracking, staff HR, finance, and engagement with local authorities or partner schools.

## **3. Scope**

### **This policy applies to:**

All personal data processed by Swift Learning in any format paper, digital, verbal  
All staff, contractors, volunteers, and governors who access or handle personal information  
Data relating to pupils, parents, staff, partner schools, local authorities, suppliers, and other stakeholders

It covers data processing within all Swift Learning sites and online learning platforms.

#### 4. Key Definitions

**Personal Data** Information that relates to an identified or identifiable individual such as name, date of birth, address, medical history, educational reports

**Special Category Data** A subset of personal data that is more sensitive and needs more protection, such as health records, ethnicity, religion, or SEN status

**Processing** Any action performed on data including collection, storage, use, sharing, analysis, or deletion

**Data Subject** The person the data relates to

**Data Controller** Swift Learning, as the organisation that determines why and how data is processed

**Data Processor** A third party that processes data on behalf of Swift Learning

**DPO Data Protection Officer** The person responsible for overseeing data protection compliance

#### 5. Data Protection Principles

Swift Learning adheres to the following UK GDPR principles:

- Lawfulness, Fairness, and Transparency
- Purpose Limitation
- Data Minimisation
- Accuracy
- Storage Limitation
- Integrity and Confidentiality
- Accountability

#### 6. Lawful Bases for Processing

Swift Learning processes personal data under one or more of the following lawful bases:

- Consent
- Contractual necessity
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

## **7. Data Subject Rights**

Data subjects have the right to:

- Access
- Rectification
- Erasure
- Restriction
  
- Objection
- Portability
- Withdraw consent
- Lodge a complaint

## **8. Data Collection and Use**

Personal data is collected from individuals, representatives, and referrers to support:

- Education delivery
- Safeguarding and wellbeing
- Attendance and behaviour tracking
- Legal and funding requirements
- Communication with families and agencies

## **9. Data Sharing**

Data is shared lawfully with:

- Schools
- Local authorities
- Exam boards
- DfE
- Health and safeguarding professionals
- Approved service providers

## **10. Data Security**

We use:

- Secure systems
- Access controls
- Encryption
- Training
- Secure storage and disposal

### **11. Data Retention**

Data is kept only as long as necessary for legal, operational, or safeguarding purposes and securely destroyed after the retention period.

### **12. Data Breach Management**

Breaches are:

- Reported to the DPO
- Assessed and contained
- Reported to the ICO if required
- Communicated to affected individuals where necessary

### **13. Data Protection Officer DPO**

**Contact:**

Paige@Swift-Learning.co.uk

### **14. Training and Awareness**

All staff are trained on GDPR responsibilities and safe data handling practices regularly.

### **15. Policy Review**

Reviewed annually or sooner if:

- Laws change
- A data breach occurs
- Operational needs change

**Date of Approval:** 01.09.2025

**Next Review Date:** 01.09.2026

**Policy Owner** Data Protection Officer, Swift Learning