



Data Protection, Privacy and Information Security Policy

Policy Owner: Lets Make Change

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Approved by: Joseph Fitzpatrick

Version	Date	Author/Reviewed By	Summary of Changes	Approved By	Review Date
1.0	01/06/26	Alex Fitzpatrick	Initial policy created	Joseph Fitzpatrick	June 2027

Let's Make Change (LMC)

Data Protection, Privacy and Information Security Policy

1. Policy Statement

Let's Make Change (LMC) is committed to protecting the privacy, confidentiality, integrity and security of all personal information entrusted to us.

We recognise our responsibilities under:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Keeping Children Safe in Education (KCSIE)
- Information Commissioner's Office (ICO) guidance

LMC is registered with the Information Commissioner's Office (ICO) and is committed to ensuring that all personal data is processed lawfully, fairly, transparently and securely.

2. Scope

This policy applies to:

- Learners
- Parents and carers
- Staff, tutors and volunteers
- Directors and managers
- Contractors and third-party providers
- Commissioners and partner organisations

The policy applies to all personal information processed by LMC in relation to education, mentoring, safeguarding, employment and operational activities.

3. Definitions

Personal Data

Information relating to an identifiable individual.

Special Category Data

Sensitive personal information requiring additional protection, including health information, ethnicity, religion and biometric data.

Processing

Any operation performed on personal data, including collection, storage, sharing and deletion.

Data Controller

The organisation determines how and why personal data is processed.

Data Processor

An organisation or individual processing data on behalf of LMC.

Data Subject

The individual to whom personal data relates.

4. Data Protection Principles

LMC will ensure personal data is:

- Processed lawfully, fairly, and transparently;
- Collected for legitimate and specified purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and kept up to date;
- Retained only as long as necessary;
- Stored securely and confidentially;
- Managed in a manner that demonstrates accountability.

5. Lawful Bases for Processing

LMC processes personal data under one or more lawful bases:

- Consent
- Contract
- Legal Obligation
- Vital Interests
- Public Task
- Legitimate Interests

Where Special Category Data is processed, an appropriate Article 9 condition will also be identified.

6. Personal Information We Collect

Learners

- Personal details
- Contact information
- Attendance records
- Educational progress
- Behaviour information
- Medical information
- Safeguarding records

Parents and Carers

- Contact details
- Emergency contacts
- Consent forms
- Communication records

Staff, Tutors and Volunteers

- Recruitment records
- DBS information
- Qualifications
- Payroll information
- Training records
- Safeguarding information

Financial Information

- Payment records
- Invoices
- Payroll administration

7. How We Collect Information

Information may be collected:

- Directly from individuals;
- Through registration and consent forms;
- Through schools, local authorities, or commissioners;
- Through safeguarding processes;
- Through employment and recruitment procedures.

8. How We Use Personal Information

Information is processed to:

- Deliver educational services;
- Safeguard learners;
- Monitor attendance and progress;
- Communicate with families and professionals;
- Meet legal and regulatory obligations;
- Manage staff and volunteers;
- Support organisational administration.

9. Consent

Where consent is required:

- Consent will be freely given;
- Consent will be informed and specific;
- Individuals may withdraw consent at any time.

Consent may be sought for:

- Photographs and videos;
- Marketing materials;
- Educational visits;
- Medical treatment where appropriate.

10. Privacy Notices

LMC will provide clear privacy notices explaining:

- What information is collected;
- Why it is collected;
- How it is used;
- Who it is shared with;
- How long it is retained;
- Individual rights.

Privacy notices will be available to learners, parents/carers, staff and volunteers as appropriate.

11. Information Sharing

Information may be shared with:

- Schools;
- Local Authorities;
- Commissioners;
- Safeguarding agencies;
- Healthcare professionals;
- Police or statutory agencies where legally required.

Only the minimum information necessary will be shared.

12. Confidentiality

All staff, tutors, and volunteers must:

- Keep personal information confidential;
- Share information only on a need-to-know basis;
- Follow safeguarding information-sharing requirements;
- Sign confidentiality agreements where required.

Confidentiality cannot be guaranteed where safeguarding concerns exist.

13. Information Security

Physical Security

- Locked storage cabinets;
- Restricted access areas;
- Secure disposal of records.

Digital Security

- Password protection;
- Encryption;
- Secure cloud storage;
- Device security;
- Multi-factor authentication where available.

Remote Working

Staff must ensure personal information remains secure when working remotely or in community settings.

14. Safe Community Spaces

As part of delivering tutoring and mentoring within community venues, LMC may process:

- Emergency contact information;
- Medical and accessibility information;
- Attendance records;
- Venue access information.

LMC will ensure venue arrangements meet appropriate data protection standards.

15. Data Retention

Personal information will only be retained for as long as necessary.

Record Type	Retention Period
Financial Records	6–7 Years
Employment Records	As required by law
Attendance Records	In line with contractual requirements
Safeguarding Records	In accordance with safeguarding guidance
Marketing Records	Until consent is withdrawn

Records will be securely destroyed when no longer required.

16. Individual Rights

Individuals have the right to:

- Be informed;
- Access their information;
- Correct inaccurate information;
- Request erasure where appropriate;
- Restrict processing;
- Object to processing;
- Data portability;
- Challenge automated decision-making.

Requests will be handled within statutory timescales.

17. Data Protection Impact Assessments (DPIAs)

LMC will conduct DPIAs where processing activities present elevated risks, including:

- Online learning systems;
- New technologies;
- Sensitive safeguarding information;
- Large-scale processing of personal data.

18. International Data Transfers

Where personal information is transferred outside the UK:

- Approved safeguards will be used;
- Adequacy decisions will be considered;
- Standard contractual clauses will be implemented where required.

19. Data Breach Reporting and Response

Any actual or suspected breach must be reported immediately.

LMC will:

1. Assess the breach;
2. Contain the incident;
3. Investigate the impact;
4. Notify the ICO within 72 hours where required;
5. Notify affected individuals where necessary;
6. Implement corrective actions.

20. Roles and Responsibilities

Director

Responsible for overall compliance and policy oversight.

Data Protection Lead

Responsible for:

- Managing compliance;
- Responding to requests;
- Managing breaches;
- Liaising with the ICO.

Staff, Tutors and Volunteers

Responsible for:

- Following this policy;
- Protecting personal information;
- Reporting concerns;
- Completing mandatory training.

21. Training and Awareness

All staff, tutors, and volunteers will:

- Complete data protection training at induction;
- Undertake refresher training annually;
- Understand confidentiality and safeguarding obligations.

22. Complaints

Concerns regarding personal information should be directed to the Data Protection Lead.

Individuals also have the right to complain to:

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

23. Related Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- Online Safety (E-Safety) Policy
- Attendance Policy
- Health and Safety Policy
- Behaviour, Relationships and Anti-Bullying Policy
- Administration of Medication Policy
- Equality, Diversity and Inclusion Policy
- Safer Recruitment Policy

24. Monitoring and Review

This policy will be reviewed:

- Annually;
- Following legislative changes;
- Following significant incidents;
- Following data breaches or security concerns.