**Data Protection Policy**

At Marvellous Minds Tuition the data in which we maintain will be (in accordance with the Data Protection Act 2018 GDPR):

1. Be processed fairly and lawfully

2. Be obtained only for specified, lawful purposes

3. Be adequate, relevant and not excessive

4. Be accurate and kept up to date

5. Not be held for any longer than necessary

6. Processed in accordance with the rights of data subjects

7. Be protected in appropriate ways

8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

Policy Scope:

This policy applies to:

* All management staff (voluntary and otherwise).
* All tutors and additional members of staff (voluntary and otherwise).

This policy applies to all the data held by Marvellous Minds Tuition relating to our clients and members of staff (voluntary and otherwise).

Responsibilities:

Everyone who works for, or with Marvellous Minds Tuition has some responsibility for ensuring data is collected, stored and handled appropriately.

Any team member that handles personal data must ensure that it is handled and processed in line with the policy and data protection principles.

Key areas of responsibility are as follows:

* Keeping the management team updated about data protection responsibilities, risks and issues.
* Reviewing all data protection procedures and related policies, in line with an agreed schedule.
* Arranging data protection training and advice for the people covered by this policy.
* Handling data protection questions from staff and anyone else covered by this policy.
* Dealing with requests from individuals to see the data holds about them (also called ‘subject access requests/SAR’).
* Checking and approving any contracts or agreements with third parties that may handle the company’s sensitive data.
* Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
* Performing regular checks and scans to ensure security hardware and software is functioning properly.
* Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
* Approving any data protection statements attached to communications such as emails and letters.
* Addressing any data protection queries from journalists or media outlets like newspapers.
* Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

General staff guidelines:

* The only people able to access data covered by this policy should be those who need it for their work.
* Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
* Marvellous Minds Tuition will provide training to all employees to help them understand their responsibilities when handling data.
* Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
* In particular, strong passwords must be used and they should never be shared. Personal data should not be disclosed to unauthorised people, either within the company or externally.
* Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
* Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.
* When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

* When not required, the paper or files should be kept in a locked drawer or filing cabinet.
* Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
* Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

* Data should be protected by strong passwords that are changed regularly and never shared between employees.
* If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
* Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
* Servers containing personal data should be sited in a secure location, away from general office space.
* Data should be backed up frequently. Those backups should be tested regularly, in line with the company’s standard backup procedures.
* Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
* All servers and computers containing data should be protected by approved security software and a firewall.

Disclosing data for specific reasons:

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from senior management and from the company’s legal advisers where necessary.

Providing information:

Marvellous Minds Tuition aims to ensure that individuals are aware that their data is being processed, and that they understand:

* How the data is being used
* How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

Subject Access Request:

The right of access allows individuals to obtain records of their personal information, held by an organisation.

Under data protection law, anyone can ask if an organisation holds personal information about them - the company must respond to their request as soon as possible, and within one month at most.Requests for personal data should be provided for free.

Individuals have the right to know:

* what information is being used
* why it’s being used
* where it came from
* who can see the information

Marvellous Minds Tuition will supply:

* confirmation that the company are processing their personal data
* a copy of that data
* details of how that data is collected, used and disposed of

Marvellous Minds Tuition will send them a hard copy or in the case of the company receiving the request by email, we will send the information by email if the requester agrees.

Safer Recruitment

Any documents relating to the recruitment of an individual will be kept either in a locked cabinet or on a password protected computer and only made accessible to the relevant people.

Safeguarding

Any documents relating to the safeguarding of an individual will be kept either in a locked cabinet or on a password protected computer and only made accessible to the relevant people.

| **Current Version** | **Last Updated** | **Review Date** |
| --- | --- | --- |
| V3 | 20/5/2024 | 18/10/2024 |
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