

**Stepping Stones Alternative Provision**

 **GDPR Policy**

**1. Introduction**

Stepping Stones is committed to protecting and respecting the privacy of our students, parents, staff, and other stakeholders. This policy outlines how we collect, use, process, and protect personal data in compliance with the General Data Protection Regulation (GDPR).

**2. Data Controller**

Stepping Stones is the data controller responsible for the personal data we process. Our contact details are:

Stepping Stones Alternative Provision LTD

255 Sandy Lane, Droylsden

Manchester, M437UE

Steppingstonesap@outlook.com

07706373715

**3. Data Protection Officer (DPO)**

We have appointed a Data Protection Officer (Head of Provision) to oversee our data protection strategy and ensure compliance with GDPR. You can contact our DPO at:

Joshua Roscoe

Steppingstonesap@outlook.com

07706373715

**4. Personal Data We Collect**

We collect and process the following types of personal data:

* **Student Data**: Name, date of birth, gender, contact details, academic records, attendance records, medical information, special educational needs, and behavioural records.
* **Parent/Guardian Data**: Name, contact details, relationship to student, and financial information (if applicable).
* **Staff Data**: Name, contact details, employment records, qualifications, payroll information, and performance reviews.
* **Other Data**: Visitor logs, CCTV footage (if applicable), and any other information necessary for the operation of Stepping Stones.

**5. Purpose of Processing Personal Data**

We use personal data for the following purposes:

* To provide educational services to students.
* To support student learning and development.
* To monitor and report on student progress.
* To provide appropriate pastoral care.
* To safeguard and promote the welfare of students.
* To manage school operations, including administration and communication.
* To recruit, employ, and manage staff.
* To comply with legal obligations and regulatory requirements.

**6. Legal Basis for Processing**

We process personal data based on the following legal grounds:

* **Consent**: We obtain consent from parents/guardians and staff where necessary.
* **Contract**: Processing is necessary for the performance of a contract with the data subject.
* **Legal Obligation**: Processing is necessary to comply with legal obligations.
* **Vital Interests**: Processing is necessary to protect the vital interests of the data subject or another person.
* **Public Task**: Processing is necessary for the performance of a task carried out in the public interest.
* **Legitimate Interests**: Processing is necessary for the legitimate interests of Stepping Stones, provided these interests are not overridden by the rights and interests of the data subject.

**7. Data Sharing and Disclosure**

We may share personal data with:

* Educational authorities, regulatory bodies, and inspection agencies.
* Health and social welfare organisations.
* Service providers and contractors who support our operations.
* Law enforcement agencies and emergency services when required.
* Other parties with the consent of the data subject or their legal guardian.

**8. Data Security**

We implement appropriate technical and organisational measures to protect personal data from unauthorised access, alteration, disclosure, or destruction. These measures include:

* Secure storage of physical and electronic records.
* Encryption of sensitive data.
* Access controls and authentication mechanisms.
* Regular staff training on data protection and security.
* Procedures for responding to data breaches.

**9. Data Retention**

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, comply with legal obligations, and protect our legitimate interests. Our data retention periods are guided by statutory requirements and best practice guidelines.

**10. Rights of Data Subjects**

Data subjects have the following rights under GDPR:

* **Right to Access**: The right to request access to their personal data.
* **Right to Rectification**: The right to request correction of inaccurate or incomplete data.
* **Right to Erasure**: The right to request deletion of their personal data in certain circumstances.
* **Right to Restrict Processing**: The right to request restriction of processing of their personal data.
* **Right to Data Portability**: The right to request transfer of their personal data to another organisation.
* **Right to Object**: The right to object to the processing of their personal data in certain circumstances.
* **Right to Withdraw Consent**: The right to withdraw consent at any time, where processing is based on consent.

Requests to exercise these rights should be made in writing to our Data Protection Officer.

**11. Data Breach Notification**

In the event of a data breach, we will notify the relevant supervisory authority within 72 hours and inform affected data subjects where there is a high risk to their rights and freedoms.

**12. Policy Review**

This policy will be reviewed annually or when necessary to reflect changes in legislation or our operations. The latest version will be available on our website and from the school office.

**13. Contact Information**

If you have any questions or concerns about this policy or our data protection practices, please contact our Data Protection Officer (Head of Provision).

**Stepping Stones Alternative Provision**

 Date 15/08/24

Head of Provision: Joshua Roscoe

Signature: J.L.ROSCOE