

Labyrinth Education

Data Protection Policy and Procedure

Document Information

Date of Issue: April 2025

Next Review Date: April 2027

Distribution: All staff and stakeholders

Owner: Senior Leadership Team

Policy Lead: Head of Education

1. Introduction

Labyrinth Education is committed to handling personal data responsibly and securely in compliance with the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR). This policy outlines our approach to data protection and the measures in place to safeguard personal data.

2. Scope

This policy applies to all directors, trustees, employees, volunteers, and independent contractors working on behalf of Labyrinth Education. It covers personal data in all formats, including:

- Manual or paper records
- Electronic records and systems
- Images and sound recordings
- Emails and text messages
- Information published in materials or on our websites

3. Definitions

- **Personal Data:** Information relating to an identifiable individual.
- **Special Category Data:** Data related to racial or ethnic origin, health, political opinions, etc.
- **Data Subject:** The individual whose data is being processed.
- **Controller:** Labyrinth Education, determining the purpose and means of processing personal data.
- **Processor:** A third-party processing data on behalf of Labyrinth Education.
- **Processing:** Any operation performed on personal data.

- **Data Protection Officer (DPO):** The designated person responsible for data protection compliance.

4. General Provisions and Responsibilities

Labyrinth Education commits to:

- Collecting and processing data lawfully, fairly, and transparently.
- Limiting data collection to what is necessary for educational and operational purposes.
- Ensuring accuracy and timely updates of personal data.
- Securing personal data against unauthorised access or loss.
- Retaining data only for the necessary period of time.

5. Legal Framework

This policy aligns with:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Other relevant UK and international data protection laws

6. Individual Rights

Individuals have the right to:

1. Be informed about data collection and use.
2. Access their personal data.
3. Request rectification of inaccurate data.
4. Request data erasure under certain conditions.
5. Restrict data processing where applicable.
6. Data portability (where applicable).
7. Object to processing in specific scenarios.
8. Avoid automated decision-making and profiling.

7. Compliance Measures

Labyrinth Education ensures:

- Transparent communication on data handling.
- Secure storage and controlled access to data.
- Compliance training for all staff handling personal data.
- Regular audits and monitoring for policy adherence.
- Timely reporting and mitigation of data breaches.

8. Complaints and Breach Reporting

Complaints regarding data protection should be directed to the Data Protection Officer at info@labyrinth-ed.co.uk. If unresolved, individuals may escalate concerns to the Information Commissioner's Office (ICO).

9. Policy Review

This policy will be reviewed biennially or when required by legislative updates.

For further information, visit the ICO website at www.ico.org.uk.