



Data Protection Policy

Policy Author - Matthew Pretty and Keisha Pretty - Directors of Project RESET

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Data Protection Policy

1. Introduction

Project Reset is committed to protecting the privacy and personal data of all children, young people, families, staff, and partners we work with. We handle all personal information in accordance with the **UK General Data Protection Regulation** and the **Data Protection Act 2018**.

This policy outlines how we collect, use, store, and protect personal data, and how we ensure confidentiality and appropriate record keeping across our provision. The Directors of Project RESET have overall responsibility for data protection compliance and information governance.

Further information regarding how personal data is processed is available in Project RESET's Privacy Notice.

2. Our Principles

We ensure that personal data is:

- Processed lawfully, fairly, and transparently
- Collected for specific, legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Stored securely and only for as long as necessary
- Protected against unauthorised or unlawful access, loss, or damage

3. What Information We Collect

We may collect and process the following types of personal data:

Children and Young People

- Name, date of birth, contact details
- Educational information and progress data
- SEND or support needs
- Safeguarding information (where relevant)

Parents/Carers

- Names and contact details
- Communication records

Staff / Tutors / Mentors

- Contact details



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- DBS and safeguarding information
- Qualifications and employment history

4. Lawful Basis for Processing

We process personal data under the following lawful bases:

- **Legal obligation** (e.g. safeguarding responsibilities)
- **Legitimate interests** (e.g. delivering education and support services)
- **Consent** (where required, such as media or recordings)

Data Subject Rights

Individuals have rights regarding their personal data, including:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure where applicable.
- The right to restrict processing.
- The right to object.
- The right to data portability where applicable.

Requests relating to personal data should be submitted in writing to Project RESET and will be responded to in accordance with UK GDPR requirements.

Subject Access Requests

Individuals have the right to request access to personal data held about them. Requests should be made in writing and will normally be responded to within one calendar month.

5. Confidentiality

We take confidentiality seriously and ensure that:

- Personal information is only shared on a **need-to-know basis**
- All staff, tutors, and associates understand their duty of confidentiality
- Sensitive information (particularly safeguarding concerns) is handled with the highest level of care

Important Note

Confidentiality may be broken where:

- There is a **safeguarding concern**



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- A child or young person is at risk of harm
- We are required to share information by law

In such cases, information will be shared appropriately with relevant agencies.

6. Record Keeping

We maintain accurate, secure, and appropriate records to support our work.

We ensure that records are:

- Clear, factual, and professional
- Dated and attributable
- Stored securely (digitally or physically)
- Only accessible to authorised individuals

Types of records may include:

- Session notes
- Progress tracking
- Safeguarding records be maintained separately from general educational records where appropriate and access will be restricted to authorised safeguarding personnel.
- Communication logs

Transfer of Records

Where a child leaves Project RESET, relevant records will be transferred securely to the receiving school, setting or organisation in accordance with safeguarding and data protection requirements.

7. Recording (Audio, Video & Images)

We may occasionally use recordings (audio, video, or images) for educational or promotional purposes.

- We will always obtain **explicit consent** before recording
- Recordings will only be used for the agreed purpose
- Individuals have the right to withdraw consent at any time
- Recordings will be stored securely and deleted when no longer required

We do not record sessions without prior knowledge and agreement.

8. Data Storage & Security

We take appropriate measures to protect personal data, including:

- Secure digital storage (password-protected systems)
- Restricted access to sensitive information
- Secure handling of physical documents



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- Regular review of data security practices

Security measures may include:

- Multi-factor authentication.
- Device encryption where appropriate.
- Secure cloud-based storage.
- Regular software updates.
- Access controls based on job role.

Personal Data Breaches

Any actual or suspected personal data breach must be reported immediately to the Director responsible for data protection.

Breaches will be investigated promptly and, where required, reported to the Information Commissioner's Office (ICO) within the relevant statutory timescales. Appropriate remedial action will be taken to reduce risk and prevent recurrence.

9. Data Retention

We only keep personal data for as long as necessary. Retention periods are based on:

- Legal requirements
- Safeguarding guidance
- Operational need

Data is securely deleted or destroyed when no longer required.

Project RESET maintains a separate Records Retention Schedule which sets out how long different categories of records will be retained.

10. Sharing Information

We may share information with:

- Schools and referring organisations
- Local authorities
- Safeguarding agencies
- Children's Social Care.
- Health professionals.
- Educational psychologists.
- Early Help services.
- Police.
- Other professionals supporting the child or family.



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Information will only be shared where there is a lawful basis and where it is necessary, proportionate and in the child's best interests.

Individuals who are dissatisfied with the way Project RESET has handled their personal data may raise concerns with the Information Commissioner's Office (ICO).