

## Data Protection (GDPR) Policy

### 1. Introduction

Wirral Health Project CIC is committed to protecting the personal data of children, young people, parents, carers, and staff in line with the UK GDPR and the Data Protection Act 2018. This policy sets out how we collect, store, use, and protect personal data, and the responsibilities of all staff in ensuring compliance.

### 2. Scope

This policy applies to all staff, volunteers, and contractors who handle personal data in any form (electronic, paper, or verbal) within Wirral Health Project CIC.

### 3. Data Protection Principles

We handle personal data in accordance with the following principles:

- **Lawfulness, fairness, and transparency** - data is processed legally and fairly.
- **Purpose limitation** - data is collected for specified, legitimate purposes.
- **Data minimisation** - only necessary data is collected.
- **Accuracy** - personal data is kept accurate and up to date.
- **Storage limitation** - data is retained only as long as necessary.
- **Integrity and confidentiality** - data is kept secure from unauthorised access, loss, or disclosure.

### 4. Roles and responsibilities

The Data Protection Officer (DPO) / designated lead oversees compliance of this policy.

All staff are responsible for following this policy, safeguarding personal data, and reporting any data breaches immediately to the DPO.

Staff must only access personal data necessary for their role.

### 5. Lawful basis for processing

We process personal data under the following lawful bases:

- **Legal obligation** - safeguarding, statutory reporting, education requirements.
- **Public task** - delivering alternative provision and associated support services.
- **Contract** - fulfilling agreements with schools or local authorities.
- **Consent** - for optional activities or use of images/videos.

### 6. Data Collection and Use

Personal data collected may include: names, DOB, contact details, EHCP information, school records, referral information.

Data is used to: deliver educational services, support learners, comply with safeguarding duties, and communicate with parents, carers, and partner organisations.

Data is shared on a need-to-know basis only, internally or externally, and always under legal or contractual obligations.

## 7. Data Storage and Security

- Personal data is stored securely (on password-protected files and devices, locked cabinets for paper files).
- Access is restricted to authorised staff only.
- Measures are in place to prevent unauthorised access, loss, or misuse

## 8. Data Retention

Data is retained only as long as necessary to meet legal, contractual, and operational needs.

Once retention periods expire, data is securely destroyed (shredding, secure deletion).

## 9. Data Subject Rights

Parents, carers, young people, and staff have the right to:

- Access the personal data held about them.
- Request corrections to inaccurate or incomplete data.
- Request deletion of personal data (where legally permitted).
- Withdraw consent for optional processing (e.g., images/videos).
- Raise concerns with the ICO if unhappy with our handling of personal data.

## 10. Data breaches

Any suspected data breach must be reported immediately to the DPO.

Breaches will be assessed, contained, and reported to the ICO if required within 72 hours.

## 11. Training and awareness

All staff receive regular training on data protection relevant to their role.

Staff must familiarise themselves with this policy and apply it in day-to-day activities.

## 12. Review

This policy will be reviewed annually or sooner if legislation or operational needs change.

Reviewed by: Jade Carter

Last review: 05.11.2025

Next review: 05.11.2026

### Contact for data protection queries:

#### Data Protection Lead

Jade Carter

Wirral Health Project CIC

Info@wirralhealthproject.co.uk