



DATA PROTECTION POLICY

Policy Aims

Step Forward Tuition is committed to being transparent about how it collects and uses the personal data of its members and its workforce, and to meeting its data protection obligations. This policy sets out the organisation's commitment to data protection, and individual rights and obligations in relation to personal data.

Step Forward Tuition is committed to complying with data protection legislation and good practice including:

- Processing personal information only where this is strictly necessary for legitimate organisational purposes
- Collecting only the minimum personal information required for these purposes and not processing excessive personal information
- Providing clear information to individuals about how their personal information will be used and by whom
- Only processing relevant and adequate personal information
- Processing personal information fairly and lawfully
- Maintaining an inventory of the categories of personal information processed by Step Forward Tuition.
- Keeping personal information accurate and, where necessary, up to date
- Retaining personal information only for as long as is necessary for legal or regulatory reasons or, for legitimate organisational purposes
- Respecting individuals' rights in relation to their personal information, including their right of subject access
- Keeping all personal information secure

Responsibilities under the General Data Protection Regulation (GDPR)

- Step Forward Tuition is a Data Controller and a Data Processor under the GDPR.
- Management and all those in supervisory roles throughout Step Forward Tuition are responsible for developing and encouraging good information handling practices within the organisation.
- The Centre Manager has specific responsibilities in respect of procedures and is the first point of call for Employees/Staff seeking clarification on any aspect of data protection compliance.
- Compliance with data protection legislation is the responsibility of all staff at Step Forward Tuition who process personal information.

When you express interest in Step Forward Tuition and book a free trial session, we will collect and process the following data from you:

- your name
- email address which will be used to send you a confirmation email
- contact telephone numbers which will be used to send you a confirmation SMS and confirmation call
- child's name, age, school and reason for interest in tuition

When you join Step Forward Tuition, we will collect and process the following data from you:

- Parent/Guardian's name, postal and email address, contact phone numbers
- Membership payer's name, postal and email address, contact phone numbers (if not parent/guardian)
- Emergency contact's names and phone numbers
- Child/ren's name, age, date of birth and school
- Information about any medical conditions, allergies or Special Educational Needs of child/ren
- Details of Direct Debit and debit/credit cards in order for us to accept payment
- If you join as a member in Darnley, Edinburgh or Murrayfield we are also required by the Scottish Care

Members should notify Step Forward Tuition of any changes in circumstances to enable personal records to be updated accordingly.

What can I opt out of?

When you join Step Forward Tuition you will:

- You have the option of allowing us to use your child's photo for the purpose of promoting Step Forward Tuition during and/or after your membership.

Who will your personal information be shared with?

If we are obliged to disclose personal data by law, or if the disclosure is necessary for purposes of national security, taxation and criminal investigation or to safeguard your child, we will do so. In some circumstances, you may not be notified first.

Your data is hosted on our system. We have relevant safeguards in place to protect your data.

What happens with my data when my membership ends and how is it retained?

- Upon cancellation of membership, your data will be stored safely and securely. We will retain your personal data for a minimum of 2 years and a maximum of 3 years following cancellation of your membership to comply with relevant safeguarding bodies regulations.
- Accident/Incident reports and Administration of Medication records will be kept indefinitely.
- Registers of attendance will be kept for 3 years.

Data Protection Principles

All processing of personal data must be done in accordance with the following data protection principles of the Regulation, and Step Forward Tuition's policies and procedures are designed to ensure compliance with them. These are:

1. Personal data must be processed lawfully, fairly and transparently

The GDPR introduces the requirement for transparency whereby the controller has transparent and easily accessible policies relating to the processing of personal data and the exercise of individuals' "rights and freedoms". Information must be communicated to the data subject in an intelligible form using clear and plain language.

The specific information that must be provided to the data subject must as a minimum include:

- the contact details of the Data Protection Officer, where applicable
- the purposes of the processing for which the personal data are intended as well as the legal basis for the processing
- the period for which the personal data will be stored
- the existence of the rights to request access, rectification, erasure or to object to the processing
- the categories of personal data concerned
- the recipients or categories of recipients of the personal data, where applicable
- any further information necessary to guarantee fair processing

2. Personal data can only be collected for specified, explicit and legitimate purposes

3. Personal data must be adequate, relevant and limited to what is necessary for processing

- The GDPR Owner is responsible for ensuring that information, which is not strictly necessary for the purpose for which it is obtained, is not collected.
- All data collection forms (electronic or paper-based), including data collection requirements in new information systems, must be approved by the GDPR Owner.
- The GDPR Owner will ensure that, on an annual basis all data collection methods are reviewed to ensure that collected data continues to be adequate, relevant and not excessive.

4. Personal data must be accurate and kept up to date

- Data that is kept for a long time must be reviewed and updated as necessary. No data should be kept unless it is reasonable to assume that it is accurate.
- Members should notify Step Forward Tuition of any changes in circumstance to enable personal records to be updated accordingly.
- It is the responsibility of staff at Step Forward Tuition to ensure that data held by Step Forward Tuition is accurate and up-to-date. Completion of an appropriate registration or application form etc. will be taken as an indication that the data contained therein is accurate at the date of submission.

5. Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing

- Where personal data is retained beyond the processing date, it will be pseudonymised in order to protect the identity of the data subject in the event of a data breach.
- Personal data will be retained in line with the retention of records procedure and, once its retention date is passed, it must be securely destroyed as set out in this procedure.

6. Personal data must be processed in a manner that ensures its security

- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- These controls have been selected on the basis of identified risks to personal data, and the potential for damage or distress to individuals whose data is being processed.
- Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the 'rights and freedoms' of data subjects in relation to the processing of personal data.
- The transfer of personal data outside of the EU is prohibited unless one or more of the specified safeguards or exceptions apply.

7. Accountability

The GDPR introduces the principle of accountability which states that the controller is not only responsible for ensuring compliance but for demonstrating that each processing operation complies with the requirements of the GDPR.

Specifically, controllers are required to maintain necessary documentation of all processing operations, implement appropriate security measures, perform DPIAs (Data Processing Impact Assessment), comply with requirements for prior notifications, or approval from supervisory authorities and appoint a Data Protection Officer if required.

8. Data subjects' rights

Data subjects have the following rights regarding data processing, and the data that is recorded about them:

- To make subject access requests regarding the nature of information held and to whom it has been disclosed.
- To prevent processing likely to cause damage or distress.
- To prevent processing for purposes of direct marketing.
- To be informed about the mechanics of automated decision-taking process that will significantly affect them.
- Not to have significant decisions that will affect them taken solely by automated process.
- To sue for compensation if they suffer damage by any contravention of the GDPR.
- To take action to rectify, block, erased, including the right to be forgotten, or destroy inaccurate data.
- To request the ICO to assess whether any provision of the GDPR has been contravened.
- The right for personal data to be provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller.
- The right to object to any automated profiling without consent.

9. Right to be forgotten

Data Subjects who wish to exercise their right to be forgotten can request this by contacting sft_manchester@outlook.com. However, we are required to keep the following data for 2 years following cancellation of membership:

- The name, home address and date of birth of each member
- The name, home address and telephone number of a parent/guardian of each member
- A daily record of the names of the children and their hours of attendance.

The right to be forgotten can be exercised after this 2 year period of non-membership. For any Data Subject who did not become a member of Step Forward Tuition, a request for the right to be forgotten will be completed within 30 days.

10. Complaints

Data Subjects who wish to complain to Step Forward Tuition about how their personal information has been processed may lodge their complaint directly with the GDPR Owner by email to sft_manchester@outlook.com.

11. Consent

Step Forward Tuition understands 'consent' to mean that it has been explicitly and freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she by statement, or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. The consent of the data subject can be withdrawn at any time.

12. Security of data

All Employees/Staff are responsible for ensuring that any personal data which Step Forward Tuition holds and for which they are responsible, is kept securely and is not under any conditions disclosed to any third party unless that third party has been specifically authorised to receive that information and has entered into a confidentiality agreement. Care must be taken to ensure that PC screens and terminals are not visible except to authorised Employees/Staff. Manual records may not be left where they can be accessed by unauthorised personnel and may not be removed from business premises without explicit authorisation. As soon as manual records are no longer required for day-to-day membership support, they should be archived. Personal data may only be deleted or

disposed of in line with the Data Retention Procedure. Manual records that have reached their retention date are to be shredded and disposed of as 'confidential waste'.

13. Rights of access to data

Data subjects have the right to access any personal data (i.e. data about them) which is held in electronic format and manual records which form part of a relevant filing system.

14. Disclosure of data

Step Forward Tuition must ensure that personal data is not disclosed to unauthorised third parties which includes family members, friends, government bodies. Step Forward Tuition will only disclose and discuss personal data with the Primary contact. The GDPR permits certain disclosures without consent so long as the information is requested for one or more of the following purposes:

- to safeguard national security
- prevention or detection of crime including the apprehension or prosecution of offenders
- to protect the vital interests of the individual
- to safeguard our members including contact with local safeguarding boards

All requests to provide data for one of these reasons must be supported by appropriate paperwork and all such disclosures must be specifically authorised by the GDPR Owner.

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- Analytical/performance cookies. These cookies allow us to recognise and count the number of visitors to our website.
- Functionality cookies – These cookies are used to recognise you when you return to our website.
- Targeting Cookies – These cookies record your visit to our website, the pages you have visited and the links you have followed.
- We may monitor traffic to our site and collect the following information:
 - The IP address of your computer
 - The referring website from which you have got to our website from

The reasons for this are:

- To make ongoing improvements to our website based on this data
- To see our most popular sources of business
- To monitor and track the use of our member-only online services