

Beyond Limits Learning & Wellbeing

Data Protection (GDPR) Policy

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Policy Scope

This policy applies to all staff, freelance tutors, volunteers, and contractors who have access to personal data through Beyond Limits Learning & Wellbeing. It outlines our responsibilities under the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

Policy Aim

To ensure personal data is processed lawfully, fairly, transparently, and securely. We are committed to protecting the rights of learners, families, and staff by storing and handling data responsibly.

Definitions

- **Personal data:** Information that identifies a living individual (e.g. name, address, medical information, EHCP details).
 - **Special category data:** Sensitive data including health, ethnicity, SEND needs, safeguarding records.
 - **Data subject:** The individual whose data is held.
 - **Data controller:** Beyond Limits Learning & Wellbeing.
 - **Data processor:** Any third party handling data on our behalf (e.g. cloud software providers).
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Data We Collect

We may collect the following types of data:

- Learner records: names, DOB, health needs, SEN profiles, attendance
- Parent/carer and commissioner contact details
- Tutor records: DBS, training, and supervision records

- Safeguarding, wellbeing, or incident notes
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Lawful Basis for Processing

We process personal data based on:

- Legal obligation (e.g. safeguarding, record keeping)
 - Contractual obligation (e.g. tuition contracts)
 - Consent (e.g. media permissions, specific sharing)
 - Legitimate interest (e.g. communication and provision planning)
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Data Storage and Security

- All records are stored electronically in encrypted, password-protected files or secure cloud platforms
 - Paper records (if used) are stored in locked cabinets
 - Access is restricted to those who need it for legitimate educational or safeguarding reasons
 - Devices used to access data are password-protected and have up-to-date antivirus software
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Retention Periods

- Learner records: retained for 6 years after leaving provision
 - Safeguarding records: retained in line with statutory guidance (usually until age 25)
 - Tutor records: retained for 6 years after the end of engagement
 - Records are reviewed and securely deleted when no longer required
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Data Sharing

We may share relevant information with:

- Local authorities, schools, or commissioners for legitimate provision needs
- Safeguarding professionals (with lawful basis)
- Only minimal, relevant data is shared with clear consent or legal basis

We never sell or use data for marketing.

Subject Access Requests (SAR)

Data subjects have the right to:

- Request access to their personal data
- Request correction or deletion of inaccurate data
- Object to processing or withdraw consent (where applicable)
- Raise concerns with the Information Commissioner's Office (ICO)

Requests should be made in writing to the Director and responded to within 30 days.

Breach Procedures

- Any data breach is reported to the Director immediately
 - If necessary, the ICO is informed within 72 hours
 - Affected individuals are notified where appropriate
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Signed:

Simon Agius

Director, Beyond Limits Learning & Wellbeing

Date: 01/09/2025

This policy complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.