

1. Policy Statement

ACT 2 CAM is committed to protecting the privacy and personal data of all students, parents/carers, staff, volunteers, contractors, and partners. We recognise our legal and ethical responsibility to ensure that all personal information is:

- Processed lawfully, fairly, and transparently
- Stored securely
- Shared only when necessary and lawful
- Used to promote the safety, welfare, and wellbeing of our community

This policy builds upon ACT 2 CAM's Website Privacy Policy and provides operational procedures for data protection, information sharing, and safeguarding-related disclosures.

2. Legislation & Guidance

This policy is governed by:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023
- Information Sharing Advice for Safeguarding Practitioners (HM Government, 2024)
- Human Rights Act 1998
- Freedom of Information Act 2000 (where applicable)

Note: Safeguarding legislation takes priority over data protection; data must be shared without consent where a child or adult at risk is in danger of significant harm.

3. Scope

This policy applies to:

- All students and young people
 - All staff, tutors, volunteers, freelancers, and contractors
 - All parents and carers
 - Any partner organisations working with ACT 2 CAM
 - All digital, written, and verbal records held by ACT 2 CAM
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4. Definitions

- **Personal Data:** Any information that identifies a living person
 - **Special Category Data:** Sensitive data such as health, safeguarding, ethnicity, or disability
 - **Processing:** Collection, storage, use, sharing, or disposal of data
 - **Data Subject:** The individual whose data is held
 - **Data Controller:** ACT 2 CAM
 - **Data Processor:** Any third party processing data on behalf of ACT 2 CAM
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5. Principles of Data Protection

ACT 2 CAM follows the UK GDPR principles:

- Lawful, fair, and transparent processing
- Collected for specified, explicit purposes
- Accurate and kept up to date
- Kept only as long as necessary
- Stored securely

- Processed with accountability
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6. Lawful Bases for Processing Data

ACT 2 CAM processes data under these bases:

- Legal obligation (e.g., safeguarding, education law)
- Vital interests (to protect life)
- Public task (safeguarding children and adults at risk)
- Contract (enrolment, employment)
- Consent (images, marketing, optional services)

Note: Safeguarding information does not require consent where there is risk of harm.

7. What Data We Collect

We may collect:

- Names, addresses, contact details
- Emergency and medical information
- Safeguarding and welfare records
- Education, attendance, and behavioural data
- DBS and safer recruitment information
- Financial and payment data
- Images and recordings (with consent)
- Website and digital data (cookies, email subscriptions)

Special Category Data is handled with enhanced security and restricted access.

8. Storage, Security & Access

ACT 2 CAM ensures:

- Digital data is password protected and encrypted where possible
- Paper records stored in locked cabinets
- Safeguarding data restricted to DSL and authorised senior staff
- Staff devices used for work are secure and monitored
- Portable storage devices are encrypted
- Data breaches reported immediately to the Director and DSL

9. Information Sharing Principles

ACT 2 CAM follows the **Seven Golden Rules of Information Sharing**:

1. Protection of a child or adult at risk is paramount
2. Share information only when necessary
3. Seek consent where appropriate
4. Ensure information is accurate and relevant
5. Share on a need-to-know basis
6. Share securely
7. Record and justify all decisions

10. Safeguarding & Statutory Information Sharing

Information will be shared without consent when:

- A child or adult at risk is in danger of harm
- A crime has been committed
- A child or adult goes missing or absconds
- There is a risk of radicalisation, exploitation, or CSE
- A serious allegation is made against a staff member

Agencies we may share with include:

- Local Authority Children's Services
- Police
- Health professionals
- Ofsted
- LADO
- NSPCC
- Prevent teams

All safeguarding sharing is: recorded, proportionate, justifiable, and necessary.

11. Data Subject Rights

All individuals have the right to:

- Access personal data
- Rectification
- Erasure (where legally permitted)
- Restrict processing
- Data portability
- Object to processing

- Withdraw consent where applicable

Requests must be made in writing and responded to within **one calendar month**.

12. Parental Rights & Children's Data

- Parents/carers may request access to a child's data
 - Safeguarding records may be withheld if disclosure could place the child at risk
 - Young people's wishes and best interests are always considered
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13. Data Retention

- Safeguarding files: Until 25th birthday of the young person
- Staff files: 6 years after employment ends
- Incident records: Minimum 7 years
- Financial records: 7 years
- Images: Until consent is withdrawn or no longer required

All data is securely destroyed once no longer legally required.

14. Data Breaches

Suspected breaches must be reported immediately to:

- ACT 2 CAM Director
- Designated Safeguarding Lead (if safeguarding-related)

Serious breaches will be reported to:

- Information Commissioner's Office (ICO) within 72 hours
 - Affected individuals, where required
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15. Third Parties & Data Processors

ACT 2 CAM only works with third parties who:

- Are GDPR-compliant
- Have appropriate security measures
- Have signed a Data Processing Agreement

Examples:

- Online learning platforms
 - Payment systems
 - Marketing providers
 - IT support services
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16. Training & Staff Responsibilities

All staff, volunteers, and contractors must:

- Complete data protection and GDPR awareness training
 - Follow this policy at all times
 - Report data protection concerns immediately
 - Only access data they are authorised to use
 - Maintain confidentiality in all settings
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17. Links to Other Policies

This policy operates alongside:

- Safeguarding & Child Protection Policy
 - Whistleblowing Policy
 - Behaviour Management Policy
 - Health & Safety Policy
 - Safer Recruitment Policy
 - Complaints Procedure
 - Social Media & Online Safety Policy
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18. Policy Review

Externally Audited: January 2026

Next review: January 2027

This policy will be reviewed annually or earlier if legislation, guidance, or operational requirements change.