



Severn Mentoring Data Protection & GDPR Policy

(Community Mentoring & Alternative Provision – September 2025)

1. Purpose of Policy

This policy outlines how Severn Mentoring collects, processes, stores and shares personal data in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

The purpose of this policy is to ensure that:

- Personal data is handled lawfully, fairly, and transparently.
- The rights and privacy of all individuals—especially children, young people, parents/carers, and staff—are protected.
- Severn Mentoring meets its statutory obligations as a data controller.
- All staff understand their responsibilities regarding confidentiality, consent, and secure information handling.

This policy applies to all Severn Mentoring staff, volunteers, contractors, and any partners processing personal data on behalf of the organisation.

2. Legal Framework and Statutory References

This policy is based on the following legislation and guidance:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Freedom of Information Act 2000** (where applicable)
- **Human Rights Act 1998 – Article 8 (Right to Privacy)**

- **Keeping Children Safe in Education (KCSIE) 2025**
- **Working Together to Safeguard Children (2023)**
- **ICO Education and Child Data Guidance (2023)**

3. Scope of Data Processed

Severn Mentoring processes data relating to:

- **Learners / mentees** – personal details, educational progress, safeguarding information, attendance, risk assessments, and support plans.
- **Parents / carers** – contact details and relevant family information to support engagement.
- **Staff / volunteers** – employment details, qualifications, DBS and safeguarding records.
- **Partner organisations** – schools, local authorities, and professional agencies (for information sharing).

Data is stored securely, electronically and/or in hard copy, and accessed only by authorised personnel.

4. Principles of the UK GDPR

Severn Mentoring adheres fully to the **seven key principles** of the UK GDPR:

Principle	Definition	Our Practice
1. Lawfulness, Fairness & Transparency	Data must be processed lawfully and openly.	We explain why data is collected in privacy notices and consent forms.
2. Purpose Limitation	Data is collected for specific, explicit purposes.	We use data only for mentoring, safeguarding, or operational purposes.
3. Data Minimisation	Only data that is necessary is collected.	We collect the minimum information required to deliver safe services.
4. Accuracy	Data must be accurate and kept up to date.	Records are reviewed regularly and amended when errors are found.

Principle	Definition	Our Practice
5. Storage Limitation	Data must not be held longer than needed.	We follow a retention schedule aligned to LA and DfE guidance.
6. Integrity & Confidentiality (Security)	Data must be kept safe and secure.	Files are password-protected, encrypted, and stored securely.
7. Accountability	The organisation must demonstrate compliance.	We maintain a Data Protection Register and audit compliance annually.

5. Lawful Bases for Processing

Under Article 6 of the UK GDPR, Severn Mentoring relies on the following lawful bases to process personal data:

- **Public task** – where processing is necessary to perform a task in the public interest (e.g., alternative education or safeguarding).
- **Legitimate interest** – where processing supports our organisational functions and is balanced with individual rights.
- **Legal obligation** – for compliance with statutory duties (e.g., safeguarding reporting).
- **Consent** – for optional activities such as media use or case studies.
- **Vital interests** – where information is needed to protect life or prevent serious harm.

For special category data (e.g., health, ethnicity, safeguarding notes), we rely on Article 9(2)(g) – *substantial public interest* – particularly for safeguarding children and vulnerable people.

6. Data Subject Rights

All individuals (data subjects) whose information is held by Severn Mentoring have the following rights under the UK GDPR:

1. **Right to be informed** – about how their data is used.
2. **Right of access** – to request copies of their personal data.
3. **Right to rectification** – to correct inaccurate or incomplete information.

4. **Right to restrict processing** – to limit how data is used.
5. **Right to data portability** – to obtain and reuse personal data for their own purposes.
6. **Right to object** – to certain types of processing, such as marketing or automated decisions.

Requests to exercise these rights should be made in writing to the **Data Protection Lead** (see section 10). Severn Mentoring will respond within **one month** as required by law.

7. Data Security and Storage

- Digital files are stored on encrypted, password-protected systems.
- Paper records are stored in locked cabinets in restricted-access areas.
- Personal data is only shared via secure methods (encrypted email or secure LA portals).
- Staff must never share data via personal devices or unapproved apps.
- All data breaches (loss, theft, or unauthorised disclosure) must be reported immediately to the **Data Protection Lead** and logged in the **Data Breach Register**.
- Serious breaches will be reported to the **Information Commissioner's Office (ICO)** within **72 hours**, as required by law.

8. Data Sharing and Third Parties

Severn Mentoring shares data only when necessary and lawful to do so, including with:

- Referring schools and local authorities
- Social care teams, safeguarding partners, and police (if required)
- Educational providers and examination bodies
- Parents/carers (for relevant learner information)

All third parties handling data on behalf of Severn Mentoring must sign a **Data Processing Agreement** confirming compliance with UK GDPR standards.

9. Data Retention and Disposal

We retain personal data only as long as necessary for operational and legal reasons.

Our retention schedule aligns with:

- *Information and Records Management Society (IRMS) – Education Records Retention Schedule*
- *Local authority commissioning requirements*

At the end of retention, data is:

- **Electronically deleted** using secure erasure methods, or
- **Physically destroyed** via cross-cut shredding or licensed disposal.

10. Named Person for Data Protection

Data Protection Lead (DPL):

Name: Richard Kear

Position: Director / Data Protection Lead

Email: Rich@prostars-fse.com

Telephone: 07717840231

The DPL is responsible for:

- Overseeing data protection compliance and staff training
- Acting as the first point of contact for any queries or breaches
- Liaising with the ICO and local authorities if required

11. Training and Awareness

All Severn Mentoring staff receive **data protection and GDPR training at induction and refreshers every two years.**

Additional training is delivered when legislation or practice guidance changes.

Refresher completion is logged on the **Training Matrix** and reviewed termly.

12. Breach Management and Reporting

A data breach is any incident leading to the loss, alteration, or unauthorised access to personal data.

Procedure:

1. Identify and contain the breach.
2. Report immediately to the Data Protection Lead.
3. Record details in the Data Breach Log.

4. Assess risk to individuals.
5. Notify ICO within **72 hours** if risk is likely.
6. Inform affected data subjects where appropriate.
7. Review causes and implement corrective measures.

13. Monitoring, Review and Accountability

- Compliance is monitored quarterly by the DPL and DSL.
- Policy is reviewed **annually** or earlier if legislation changes.
- Breach reports and audit findings inform staff CPD and procedural improvements.
- Evidence of compliance is maintained for inspection or commissioning purposes.

Approved by: CEO / Data Protection Lead

Date: September 2025

Next Review: September 2026

Applies to: All Severn Mentoring staff, contractors and volunteers