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DATA & TECHNOLOGY

Data Protection Policy and Data Processing Procedures

Collecting only what we need, keeping it secure, and respecting every family's rights.



POLICY OWNER

Data Protection Lead

APPLIES TO

Everyone who handles personal data for the centre

THE ONE RULE TO REMEMBER

Only the minimum data, only to people who need it, deleted when no longer needed.

1. Rules

1. JMS Publishers and Providers Ltd is the data controller and pays the annual data protection fee to the ICO.
2. Parents receive a clear privacy notice at enrolment explaining what we hold, why, and for how long.
3. We collect only what we need: contact details, emergency contacts, school year, test results, and any needs or medical information the parent shares.
4. Registers, test scores and records in Google Sheets are shared only with staff who need them; access is removed the day someone leaves.
5. Photos, videos, testimonials and results used in marketing need separate, written, opt-in consent, which can be withdrawn at any time.
6. Marketing emails and messages go only to parents who have opted in.
7. Safeguarding records are kept separately by the DSL.
8. Records are deleted in line with the retention schedule.
9. Personal data is never entered into a public AI tool (Policy 14).
10. Children should not submit personal information to us through our website; parents and guardians provide it on their behalf.
11. Where our Terms and Conditions and this policy differ on personal data, this policy applies.

2. Requests from individuals

A parent, student or staff member may ask for a copy of their data (a subject access request), for corrections, or for deletion. Requests go to the Data Protection Lead (info@pass11plusgrammar.com) and are answered within **one month** (extendable by two months for complex requests). Before sharing a child's data we confirm the requester's identity and parental responsibility.

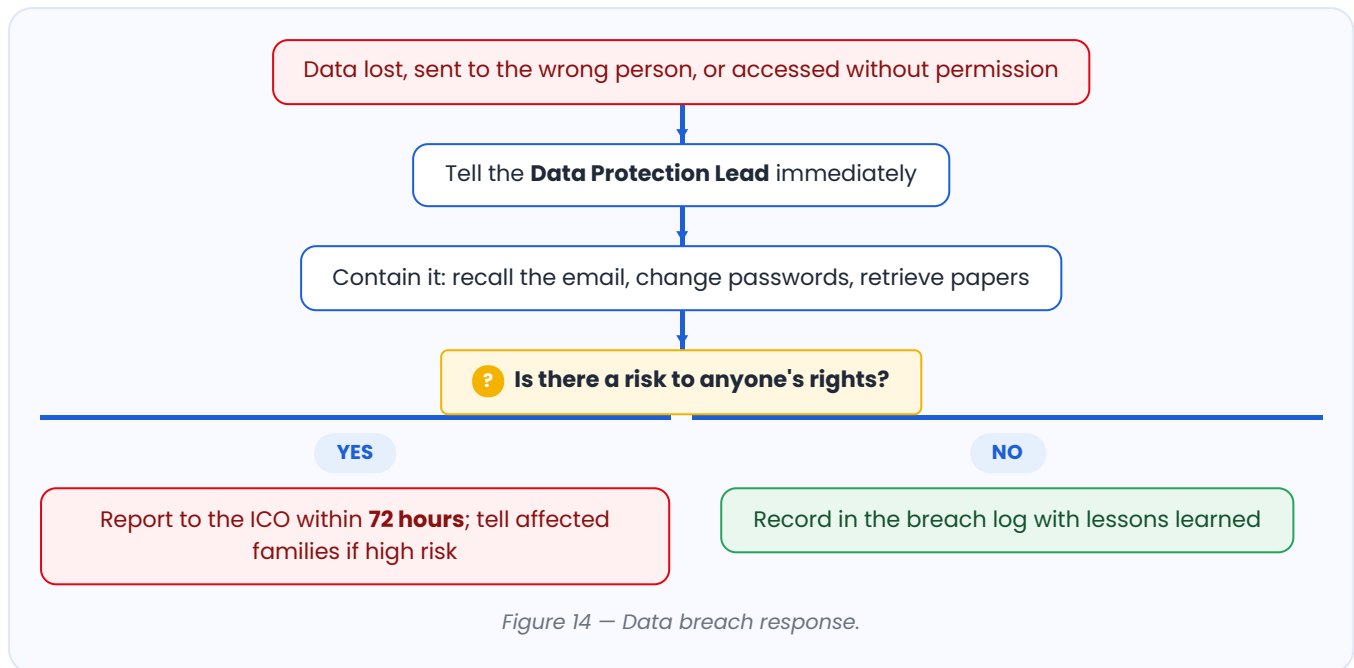
3. Data processing procedures

The table below sets out the main personal data we process, why, the lawful basis under UK GDPR, and how long we keep it. Records are securely deleted or anonymised at the end of each period.

Data	Why we use it	Lawful basis	Kept for
Parent and child contact details, emergency contacts, programme	Enrolment, teaching, communication	Contract (parent); legitimate interests (student)	While enrolled + 1 year
Registers, homework, test and mock results	Tracking progress and attendance	Contract; legitimate interests	While enrolled + 1 year
Invoices and payment records	Fees and accounts	Contract; legal obligation	6 years
Health, allergy and additional-needs information	Keeping children safe; reasonable adjustments	Legitimate interests and vital interests; Art 9(2)(c) and DPA 2018 Sch 1 para 18 (safeguarding)	While enrolled
Accident records	Health and safety	Legal obligation	Until the child is 21
Safeguarding records	Protecting children	Substantial public interest (safeguarding)	Until the child is 25
CCTV images	Safety and security (Policy 4)	Legitimate interests	Up to 30 days
Photos, testimonials, published results	Marketing	Consent	Until consent is withdrawn
Staff and specialist DBS details	Safer recruitment	Legal obligation; employment	Duration of engagement + 6 years

- **Who we share with:** only trusted service providers acting on our instructions under contract (for example video-conferencing, cloud storage and payment providers), and authorities where the law or safeguarding requires it. We never sell personal data.
- **Transfers outside the UK:** where a provider stores data abroad, we make sure UK-approved safeguards are in place.
- **Security:** password-protected devices and accounts, access limited by role, locked storage for paper records, and staff training.
- **New systems:** any new system or use of personal data is assessed for risk before it starts.

4. Data breaches



5. Complaints

Data protection complaints follow the stages and timescales in our Complaints Policy (Policy 18): acknowledged within 5 working days and answered within 15. Anyone unhappy with our response can complain to the Information Commissioner's Office (ico.org.uk, 0303 123 1113).