LIMITLESS ALTERNATIVE PROVISION

GDPR & DATA PROTECTION POLICY

Adopted: Feb 2026
Review: Feb 2027
DPO: Dwayne Paul

1. POLICY STATEMENT

Limitless Alternative Provision is committed to protecting the privacy and rights of individuals in line with the UK GDPR, Data Protection Act 2018, Freedom of Information Act 2000, and Ofsted guidance. This policy applies to all personal, sensitive, and special category data relating to pupils, staff, parents, commissioners, and visitors.

2. DATA PROTECTION PRINCIPLES

All personal data will be processed lawfully, fairly, and transparently; collected for specified, explicit and legitimate purposes (purpose limitation); kept adequate, relevant and limited to what is necessary (data minimisation); accurate and kept up to date; stored securely (integrity and confidentiality); and handled with demonstrated accountability.

3. LAWFUL BASES FOR PROCESSING

Data is processed on lawful bases including consent, legal obligations, vital interests, public tasks (educational duties), and legitimate operational interests (risk assessment, safeguarding).

4. SPECIAL CATEGORY DATA

Special category data (health records, SEND information, ethnicity, safeguarding data) requires explicit consent, strictly limited access, secure storage, and use solely for specified educational or safeguarding purposes.

5. ROLES AND RESPONSIBILITIES

DPO (Dwayne Paul): Ensures GDPR compliance, provides advice, conducts audits, and reports breaches.
Staff: Handle data lawfully, maintain confidentiality, report breaches immediately, and follow retention schedules.
Leadership: Ensure adequate resources, review data practices, and support audits.

6. DATA COLLECTION, STORAGE AND SECURITY

Data is collected for admissions, safeguarding, behaviour, SEND support, attendance, and staff management. Electronic data is stored securely on password-protected systems with regular backups; paper records are kept in locked cabinets.

7. DATA RETENTION SCHEDULE

Type of Record	Retention Period
Pupil records (without EHCP)	25 years from Date of Birth
EHCP / SEND information	25 years or until student reaches 25
Staff records	6 years after leaving employment
Safeguarding files	Until student is 25 or longer if required
Financial / payroll records	6 years

8. DATA SUBJECT RIGHTS & SHARING

Individuals have rights to access, rectification, erasure, restriction, and portability. Requests are managed within 1 month. Data sharing with local authorities, safeguarding agencies, health professionals, and IT contractors follows strict GDPR compliance, written agreements, and minimum necessary principles.

9. DATA BREACHES & TRAINING

Staff must report breaches immediately to the DPO. The DPO investigates and notifies the ICO within 72 hours if required. All staff receive GDPR training during induction and annual refresher sessions.

10. COMMITMENT STATEMENT

Limitless Alternative Provision is committed to protecting personal and sensitive data, upholding GDPR principles, maintaining secure systems, and ensuring transparent data practices central to safeguarding.

Signed:



Name: Dwayne Paul | **Role:** Proprietor / DPO **Date:** 23/03/2026