

PL6 Learning Hub Data Protection and Cyber Security Policy

Approved by: Western Education Solutions Ltd

Applies to: All staff, learners, volunteers, contractors, and third-party service providers

Designated Safeguarding Lead (DSL) / Data Protection Lead: Greg Western

Date of Approval: 8 October 2025

Next Review Due: 8 October 2026

1. Policy Statement

PL6 Learning Hub is committed to protecting the privacy and security of all personal data we hold. We collect, store, and process personal information about learners, parents/carers, staff, and partners in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Purpose

This policy ensures that all data is handled lawfully, securely, and transparently, and that PL6 systems such as CPOMS, Century AI, TutorBird, and Xero are used safely and appropriately.

3. Scope

Applies to all data processed by PL6, including personal data, safeguarding records, and staff information. Covers all staff, volunteers, and contractors handling PL6 data.

4. Legal Framework

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Freedom of Information Act 2000
- Keeping Children Safe in Education (KCSIE) 2025
- ICO Guidance

5. Data Protection Principles

PL6 ensures all data is:

1. Processed lawfully, fairly, and transparently.
2. Collected for explicit, legitimate purposes.
3. Adequate, relevant, and limited.
4. Accurate and up to date.
5. Stored securely and for no longer than necessary.
6. Processed securely with appropriate protection.

6. Roles and Responsibilities

Data Protection Lead (Greg Western):

- Oversees data protection compliance.
- Ensures staff training and awareness.
- Investigates and reports data breaches.

All Staff and Volunteers:

- Follow this policy and complete annual training.
- Store and transmit data securely.
- Report breaches immediately to the DSL.

7. Data Storage and Security

- Data stored securely in encrypted systems (CPOMS, Century AI, TutorBird).
- Paper records kept in locked cabinets.
- Access restricted by user role.
- Devices protected by antivirus, firewalls, and regular backups.

8. Data Sharing

Personal data shared only when necessary for safeguarding, legal, or educational purposes, including:

- Local authorities, exam boards, or external professionals.

All sharing recorded and approved by the DSL.

9. Subject Access Requests (SARs)

Individuals may request access to their data by emailing greg@pl6learninghub.co.uk. Requests will be acknowledged within one month, with ID verification required.

10. Data Breach Management

- All breaches reported immediately to DSL.
- Assessed and logged in Data Breach Log.
- ICO notified within 72 hours if risk is high.
- Affected individuals informed where appropriate.

11. Cyber Security

- Multi-factor authentication enabled where possible.
- Strong, unique passwords used and changed regularly.
- Devices auto-lock after inactivity.
- Staff trained to recognise phishing and malware.
- USB devices must be encrypted.

12. Data Retention

- Safeguarding records: 25 years.
- Learning and attendance data: 6 years.
- Staff records: 7 years post-employment.

- Financial data: 6 years.
- Secure deletion or shredding after expiry.

13. Staff Training

All staff receive annual GDPR and cybersecurity training, plus guidance on using CPOMS, TutorBird, and Century AI securely.

14. CCTV and Photography

- No CCTV in use.
- Photos/videos only taken with consent and stored securely on PL6-approved devices.

15. Review and Compliance

Policy reviewed annually by the DSL and Director. PL6 remains registered with the Information Commissioner's Office (ICO) under Western Education Solutions Ltd.

Signed:

Greg Western

Designated Safeguarding and Data Protection Lead

PL6 Learning Hub

Western Education Solutions Ltd

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