

ASTRAL TUITION SERVICES' GDPR POLICY

Statement of Intent

The General Data Protection Regulation (GDPR) is an EU directive that came into force on 25th May 2018. It is designed to protect the personal data of anyone residing in the EU regardless of whether they are EU citizens. As a private company processing information on its staff members and customers, Astral Tuition Services are required to ensure that personal data is maintained according to GDPR policy. This means that information received from Astral Tuition Services' customers or referrers, is subject to specific rights and privacy practices. This specifically refers to automated data and any source that allows the identification of an individual whether an employee or an individual referred by a school, LA or other organisation.

Accountability

The policy requires Astral Tuition Services to seek specific consent for the sharing of special data categories such as:

- Payment or financial information
- Health, biometric or genetic information
- Children's personal information

As well as sensitive Personally Identifiable Information such as data concerning:

- health or the sex life or sexual orientation of an individual
- racial or ethnic origin; political opinions; religious or philosophical beliefs.

The policy requires Astral Tuition Services to appoint a Data Protection Officer (DPO) who oversees the safeguarding of all personal information within Astral Tuition Services. The DPO will ensure that automated personal information is password protected and manual files are locked away with restricted access.

The GDPR principle of 'storage limitation'

The Data Protection Act 2018 adopts the GDPR principle of 'storage limitation' which requires that personal data should be kept for **no longer than is necessary** for the purpose for which the data are processed.

Rights of Referrers and Staff Members

The GDPR policy gives individuals, specifically customers referring children and young people, and staff members, various rights. These are the rights to:

- information held by Astral Tuition Services about themselves or someone they may be referring
- access via a subject access request (SAR)
- rectification - to put right any errors
- restrict processing - suppress the processing of information
- object - to the processing or direct marketing of any information held about them
- erasure - that is the deletion or removal of personal data where there is no reason for its retention
- data portability - referrers and staff members can use their personal data across services.

Data Privacy Impact Assessments

As much of the data controlled and processed by Astral Tuition Services can be deemed as special and thus high risk, Astral Tuition Services will conduct DPIAs on a regular basis and at least annually when policies, processes and procedures will be reviewed. These will include:

- A systematic description of the processing operations and their purposes
- An assessment of the necessity and proportionality

- An assessment of the risks
- The measures needed to address the risks

Data security - Astral Tuition Services will ensure that all staff members, as part of their induction, are aware of the necessity of confidentiality when referring to users of the service to external agencies or persons.