



<b>Policy:</b>	<b>Data Protection (GDPR) Policy</b>
<b>Date of approval:</b>	March 2026
<b>Effective date:</b>	April 2026
<b>Next review date:</b>	March 2027

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## **1. Purpose**

Kingsford Education Group (KEG) is committed to protecting personal data and ensuring that it is processed lawfully, fairly, and transparently.

The purpose of this policy is to establish a comprehensive framework for the collection, use, storage, and protection of personal data in accordance with applicable data protection legislation, including the UK GDPR and the Data Protection Act 2018.

This policy aims to:

- Safeguard the rights and freedoms of individuals
- Ensure lawful and secure processing of personal data
- Promote accountability and good data governance
- Minimise the risk of data breaches
- Ensure compliance with regulatory and legal obligations

KEG processes personal data relating to students, staff, applicants, and other stakeholders in order to carry out its core functions, including teaching, administration, safeguarding, and regulatory reporting.

## **2. Scope**

This policy applies to all personal data processed by KEG, regardless of format, including paper records and electronic data.

It applies to:

- All staff, including permanent, temporary, and agency staff
- Contractors, consultants, and third parties acting on behalf of KEG
- All processing activities undertaken by KEG

The policy applies to all personal data, including special category data.

## **3. Data Protection Principles**

KEG will comply with the data protection principles set out in UK GDPR. Personal data will be:

- Processed lawfully, fairly, and in a transparent manner  
Collected for specified, explicit, and legitimate purposes  
Adequate, relevant, and limited to what is necessary  
Accurate and kept up to date  
Retained only for as long as necessary  
Processed securely to prevent unauthorised access, loss, or damage

- KEG will ensure that these principles are embedded in all data processing activities.

#### **4. Lawful Basis for Processing**

KEG will ensure that all processing of personal data is supported by a lawful basis.

The lawful bases include:

- Consent
- Contractual necessity
- Legal obligation
- Vital interests
- Public task
- Legitimate interests where applicable

The appropriate lawful basis will be identified before processing begins and will be documented.

#### **5. Individual Rights**

KEG recognises and upholds the rights of individuals under data protection law. These include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights relating to automated decision-making and profiling

KEG will ensure that processes are in place to enable individuals to exercise these rights effectively.

#### **6. Accountability and Governance**

KEG will implement appropriate technical and organisational measures to demonstrate compliance with data protection legislation.

This includes:

- Maintaining records of processing activities
- Conducting internal audits and reviews

- Providing staff training and awareness
- Implementing data protection by design and by default
- Carrying out Data Protection Impact Assessments where required

KEG will adopt a risk-based approach to data protection and continuously review its practices.

## **7. Roles and Responsibilities**

All staff are responsible for handling personal data in accordance with this policy and must ensure that data is processed securely and appropriately.

Managers are responsible for ensuring that staff understand their responsibilities and that appropriate controls are in place within their areas.

Kingsford Education Group is responsible for ensuring compliance with legal requirements and maintaining effective data governance arrangements.

## **8. Data Protection Officer**

KEG will appoint a Data Protection Officer (DPO) where required.

The DPO is responsible for:

- Monitoring compliance with data protection legislation
- Providing advice and guidance on data protection matters
- Supporting Data Protection Impact Assessments
- Acting as a contact point for individuals and regulatory authorities

The DPO will operate independently, report to senior management, and be adequately resourced to perform their role. The DPO can be contacted via [dpo@kingsford.org.uk](mailto:dpo@kingsford.org.uk)

## **9. Data Sharing and Contracts**

Where KEG shares personal data with third parties or uses data processors, appropriate safeguards will be in place.

All data processing by third parties will be governed by written contracts that ensure:

- Processing is carried out only on KEG's instructions
- Confidentiality is maintained
- Appropriate security measures are in place
- Data subject rights are supported
- Data is returned or securely deleted at the end of the contract

KEG will ensure that any data sharing is lawful, necessary, and proportionate.

## **10. Record Keeping and Documentation**

KEG will maintain accurate records of all data processing activities.

These records will include:

- The purposes of processing
- Categories of data and data subjects
- Recipients of data
- Data retention periods
- Security measures in place

This documentation supports accountability and regulatory compliance.

## **11. Data Security**

KEG will implement appropriate technical and organisational measures to ensure the security of personal data.

Personal data will be:

- Stored securely, whether in physical or electronic form
- Protected against unauthorised access, loss, or disclosure
- Accessed only by authorised individuals

Staff must ensure that personal data is not disclosed to unauthorised persons and is handled securely at all times.

Unauthorised disclosure or misuse of personal data may result in disciplinary action.

## **12. Personal Data Breaches**

A personal data breach is any incident that leads to the loss, alteration, or unauthorised disclosure of personal data.

KEG will:

- Investigate all suspected breaches promptly
- Assess the risk to individuals
- Notify the relevant authority where required within statutory timeframes
- Take appropriate action to mitigate risks

All staff must report suspected breaches immediately in accordance with KEG procedures.

## **13. Retention and Disposal**

Personal data will be retained only for as long as necessary for the purposes for which it was collected.

KEG will implement retention schedules and ensure that data is securely disposed of when no longer required.

#### **14. Training and Awareness**

KEG will ensure that staff receive appropriate training on data protection and information security.

Training will be proportionate to roles and responsibilities and will be updated regularly.

#### **15. Status of the Policy**

This policy applies to all staff and forms part of KEG's governance framework.

Failure to comply with this policy may result in disciplinary action.

Concerns regarding data protection should be raised with the Data Protection Officer.