

## **IncludEd GDPR Policy**

**Effective Date:** 16.04.2025

**Data Controller:** IncludEd – Joanne Parkhouse

**ICO Registration:** Registered with the Information Commissioner's Office (ICO)

**Business Address:** 54 Western Close, Ashby-de-la-Zouch, Leicestershire, LE65 2FB

### **1. Introduction**

IncludEd is committed to protecting the privacy and security of personal data. As a provider of bespoke curriculum support for home-educated and EOTAS (Education Other Than At School) learners, IncludEd processes a range of personal and sensitive data. This GDPR Policy outlines how personal data is collected, used, stored, and safeguarded in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

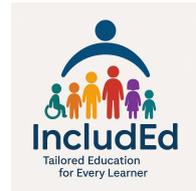
### **2. Scope**

This policy applies to all personal data processed by IncludEd in relation to its educational services. It applies to clients (children, parents/carers), and any data received from professionals or local authorities.

### **3. Lawful Basis for Processing**

IncludEd processes personal data under the following lawful bases:

- **Consent** (Article 6(1)(a))



- **Contractual necessity** (Article 6(1)(b))
- **Legal obligation** (Article 6(1)(c))
- **Vital interests** (Article 6(1)(d)), where appropriate
- **Legitimate interests** (Article 6(1)(f)), where justified
- **Special Category Data** is processed under Article 9(2)(a) (explicit consent) and/or 9(2)(h) (health or social care provision)

#### 4. Types of Personal Data Collected

IncludEd may collect and process the following categories of data:

- Personal identification details (name, date of birth, address, contact details)
- Health and medical information
- Educational assessments and records
- Education, Health and Care Plans (EHCPs)
- Reports from professionals (e.g., educational psychologists, therapists)

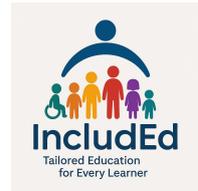
#### 5. How Personal Data is Used

Data is collected to:

- Tailor curriculum and educational activities
- Monitor and assess educational progress
- Comply with legal and safeguarding obligations
- Communicate with families and relevant professionals

#### 6. Data Sharing

IncludEd does **not** share personal data with any third parties unless:



- Explicit consent is provided
- Required by law (e.g., safeguarding concerns)
- Necessary for the delivery of services (and consent has been obtained)

As of the effective date of this policy, no external processors are used. Should this change in future (e.g., freelance tutors or platforms), appropriate data processing agreements will be implemented.

## 7. Data Security

IncludEd employs appropriate technical and organisational measures to protect personal data, including:

- Encrypted digital storage
- Password-protected systems
- Restricted access
- Regular backups and security checks

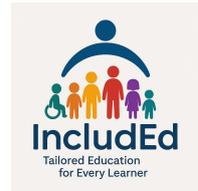
## 8. Data Retention

Personal data will be retained only for as long as necessary:

- Educational records and EHCP-related documents: up to 7 years after service delivery ends
- Consent forms and communications: 3 years after service delivery ends
- Where legally required (e.g., safeguarding), longer retention may apply

## 9. Your Rights

Under the UK GDPR, individuals have the following rights:



- Right to access personal data
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object
- Right to withdraw consent at any time

Requests to exercise these rights should be made in writing to IncludEd at [Insert Email Address].

## 10. Complaints

If you are concerned about how your data is being used, please contact IncludEd directly. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- **Website:** [www.ico.org.uk](http://www.ico.org.uk)
- **Helpline:** 0303 123 1113

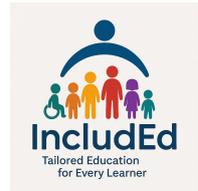
## 11. Policy Review

This policy will be reviewed annually or in the event of changes to processing activities, legislation, or guidance.

**Reviewed by:** Joanne Parkhouse

**Review Date:** 16.04.2025

**Contact:**



IncludEd

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ICO Registration Number: Awaiting registration number