



# GDPR Policy

Date: February 2026

Review Date: February  
2027

## **INTRODUCTION**

Little Gate Farm is a registered charity in England and Wales (1153584).

Little Gate needs to collect and use certain types of information about individuals that come into contact with our organisation. We are committed to protecting the privacy and personal data of our employees, clients, and all other stakeholders. This GDPR (General Data Protection Regulation) policy outlines our procedures and practices for ensuring we use this information properly, and that there are safeguards to be compliant with the applicable data protection laws and regulations, in line with the General Data Protection Regulations 2018.

## **SCOPE**

Unless expressly stated to the contrary any reference to Little Gate, Little Gate, Little Gate Farm, or the Charity should be treated as including Little Gate College, and any reference to client/participant/work trainees should be treated as including a Student of Little Gate College.

This policy applies to all personal data processed by Little Gate during our operational work, regardless of the format or medium in which it is stored. It applies to all employees, clients, contractors, volunteers, and any other individuals who process personal data on behalf of Little Gate.

### **Data Protection Officer (DPO)**

Little Gate has appointed a Data Protection Officer (DPO) to oversee data protection activities, ensure compliance with the GDPR, and act as a point of contact for individuals and supervisory authorities. For any inquiries or concerns related to data protection and this GDPR policy, or if you wish to make a complaint about how we handle your data, individuals can contact the Little Gate DPO or the Little Gate College DPO Jo Gore.

### **Data Subject Access Requests**

Examples of the types of information we may request and how it is used are at Annex A.

Any individual who wishes to obtain information about themselves that is held by Little Gate must send a written request to the DPO.

## PRINCIPLES FOR PROCESSING PERSONAL DATA

Little Gate adheres to the 7 key principles:

a. **Lawfulness, Fairness, and Transparency:** Personal data is processed lawfully, fairly, and transparently. Individuals are informed about the processing of their personal data and their rights. No decision of significant impact is made about an individual solely based on automated decision making.

b. **Purpose Limitation:** Personal data is collected for specified, explicit, and legitimate purposes. It is not processed further in a manner incompatible with these purposes.

c. **Data Minimisation:** Personal data is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

d. **Accuracy:** Personal data is accurate, and reasonable steps are taken to ensure it is up to date. Inaccurate or incomplete data is rectified or erased without undue delay.

e. **Storage Limitation:** Personal data is kept in a form that permits identification of individuals for no longer than necessary for the purposes for which it is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest.

f. **Integrity and Confidentiality:** Personal data is processed securely, and appropriate technical and organisational measures are in place to protect against unauthorised or unlawful processing, accidental loss, destruction, or damage.

g. **Accountability:** the controller shall be responsible for and be able to demonstrate compliance with that set out under Lawfulness, Fairness and Transparency.

## HOW LITTLE GATE WILL APPLY THE ABOVE PRINCIPLES

Little Gate will:

- Only collect and process personal data when there is a lawful reason for doing so, and only to the extent for which it is needed.
- Ensure the individual has given clear consent for the processing of their personal data.
- Ensure the processing is necessary for the performance of a contract with the individual or to take steps at the individual's request prior to entering into a contract.
- Ensure the processing is necessary to comply with a legal obligation.
- Ensure the processing is necessary for the legitimate interests pursued by Little Gate or a third party, except where such interests are overridden by the individual's rights and interests.
- Ensure the purpose for which the information is used is specified
- Have a data retention and destruction policy and apply checks to determine it meets with the length of time information is held.
- Publish this Privacy Notice on our website.
- Have clear processes on how to handle a Data Breach.

## INDIVIDUAL RIGHTS

Little Gate acknowledges and respects the rights of individuals regarding their personal data. These rights include:

- a. **Right to Access:** Individuals have the right to request access to their personal data.
- b. **Right to Rectification/Erasure/Block:** Individuals have the right to request the correction, rectification, erase or block personal data which is regarded as incorrect.
- c. **Right to Restrict Processing:** Individuals have the right to request the restriction of processing of their personal data under certain circumstances.
- d. **Right to Withdraw Consent:** Individuals have the right to withdraw their consent for processing personal data at any time.

## DATA SECURITY

Little Gate takes appropriate technical and organisational measures to ensure the security of personal data. These measures include:

- a. **Access Controls:** Limiting access to personal data on a need-to-know basis, with appropriate user access controls and permissions.
- b. **Encryption and Anonymisation:** Implementing encryption and anonymisation techniques to protect personal data.
- c. **Security Incident Response:** Having procedures in place to detect, report, and investigate personal data breaches. Individuals will be notified in the event of a breach when required by law.
- d. **Privacy by Design and Default:** Little Gate integrates data protection into its projects and operations from the outset, ensuring that privacy is considered at every stage of the data processing lifecycle.
- e. **Privacy Impact Assessment (PIA):** Little Gate conducts Privacy Impact Assessments where processing activities might result in high risks to the rights and freedoms of individuals. This assessment helps in identifying potential privacy risks.
- f. **Training and Awareness:** All employees, contractors, and individuals processing personal data on behalf of Little Gate receive mandatory training on data protection and privacy laws and regulations. Regular awareness programs are conducted to ensure understanding and compliance. Everyone managing and handling personal information is appropriately supervised. Anybody who receives a Subject Access Request, Right to Erasure Request or an enquiry about handling personal information knows what to do and the process to follow.

**A breach of the rules and procedures identified in this policy by a member of staff may lead to disciplinary action being taken & could result in dismissal.**

## **Audit**

Little Gate, through its DPO's, regularly tests its data systems and processes to assess compliance. These tests are completed through data audits which take place annually to review use of personal data. The DPO's will also provide an annual report to the College Board of Trustees, reporting activities, advice and recommendations on data protection issues.

## **DATA BREACH**

What is a personal data breach:

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches can include:

- access by an unauthorised third party.
- deliberate or accidental action, (or inaction), by a controller or processor.
- sending personal data to an incorrect recipient.
- computing devices and mobile phones containing personal data being lost or stolen.
- alteration of personal data without permission; and
- loss of availability of personal data.

## **Reporting Data Breaches**

In the event of a personal data breach, Little Gate has established procedures to detect, report, and investigate breaches promptly. Individuals affected by the breach will be notified when there is a high risk to their rights and freedoms.

**b. Mitigation and Response:** Little Gate takes immediate action to mitigate the effects of a data breach and prevent further unauthorised access. This includes evaluating the extent of the breach identifying and preserving information which could serve as evidence of unlawful access and implementing measures to prevent future occurrences.

**c. Documentation:** All data breaches, regardless of their severity, are documented, including their effects and the actions taken to address them. This documentation assists in demonstrating compliance with data protection regulations.

## **POLICY REVIEW AND UPDATES**

This GDPR policy is subject to regular review to ensure that it remains accurate, effective, and aligned with legal and regulatory changes.

## **ANNEX A**

Examples of information we may ask you to provide and how we will use it.

### **Why we use your Information:**

- You have given us your consent to use the information for a specified purpose, such as sending you marketing emails
- We have a legal obligation to use your information, for example to claim Gift Aid.
- We need to use your information to fulfil a contract with you, but this is unlikely to apply to you if you support us through donations or volunteering.
- We are using your information in pursuit of a legitimate interest, for example:
  - To pursue our charitable purpose to deliver our mission and vision.
  - To raise vital funds for our work
  - To ensure we meet our regulatory requirements as a charity
  - To manage our ongoing relationship with our supporters and anyone we work with
  - To manage our financial transactions and prevent fraud

### **How we use your information to fulfil your requests and support you**

- To respond to or fulfil any requests, complaints or queries you make to us
- To process any donations you make, claim any relevant Gift Aid, and maintain a record of your past or potential future financial contributions
- To provide you with information and support for any events, fundraising and campaigning activities or volunteering opportunities you sign up to

### **Managing Recruitment**

When applying for a role with Little Gate, via our website and/or through a recruitment agency, the personal data you provide as part of the recruitment process will only be held and processed for the purpose of the selection processes of Little Gate and in connection with any subsequent employment unless otherwise indicated. By submitting your personal information, you are consenting to Little Gate holding and using it.

You will be asked to provide certain information including your name, contact details, employment history and qualifications. This information is mandatory in order for Little Gate to consider your application, communicate with you about your application and

where successful, follow up with references or meet our statutory and internal monitoring and reporting responsibilities. We may also view social media profiles of applicants, such as LinkedIn, to the extent that it is relevant to your application. Please see the Safer Recruitment Policy for further information.

## **INFORMATION COLLECTED BY THE COLLEGE**

While running the college and providing educational provision, we collect the following personal information about our students:

- names, addresses, telephone numbers, e-mail addresses and other contact details for parents and next of kin
- Information about members of your family, your family relationships and family circumstances (including eligibility for bursary funds and free college meals). We may also need information about any court orders or criminal petitions which relate to you so that we can comply with safeguarding obligations to protect students' welfare and well-being
- Name, home address and date of birth of student
- National Insurance Number, Unique pupil number (UPN) or unique learner number (ULN) of student
- Ethnicity, legal gender, and religion of student
- References given or received by the college about students and information provided by other educational establishments and/ or other professionals or organisations working with students
- Information about health and medical requirements, including personal care information
- dietary requirements and allergies
- Copies of Education, Health and Care Plans (EHCPs), (including information about learning difficulties or disabilities)
- Education, care and therapy reports from previous education providers
- Individual Learning Plans
- Meeting minutes (regarding education, care and therapy, progress and behaviour)
- Case notes and clinical notes (regarding medical, care, behaviour and therapy)
- Annual review documentation
- Social worker details and safeguarding information
- Bank details and other financial information (where required)
- Attendance and behaviour records
- Assessment and attainment information including student work and marks
- We may take pictures of students for the purpose of admission and/or reports to support their education and development
- We may take pictures of you and/or your child at college events to use in marketing material. This is usually to show prospective parents and students what we do and to keep our current parents informed of events. This is always with your consent

- We use CCTV at the college to ensure the site is safe
- Trips and activities information
- Progression data in terms of establishments attended after leaving the college such as educational institution or supported living services attended.

The College processes this information to enable the registration of a student, provide the educational study programme and for the purposes of management information, forecasting and planning activities.

## **WHO THE COLLEGE SHARES ITS PERSONAL DATA WITH**

### **Routine data sharing**

The college routinely shares personal information with:

- Health professionals
- Past and future educational establishments – usually on request from other schools or colleges
- Others with Parental Responsibility for a student
- Local Authority (e.g. SEN Team, Adult Social Care Team, Health Team);
- Examination Awarding Bodies

### **Third party Suppliers**

In accordance with the relevant data protection legislation, some of the College's processing activity is carried out on its behalf by third parties, such as IT systems, web developers and cloud storage providers.

There may also be occasions where data is shared with other contractors and suppliers, such as education software providers, document destruction services, consultants, and other experts such as educational psychologists or therapists.

This type of data sharing is always subject to contractual assurances that personal data will be kept securely and only in accordance with the College's specific directions. The College will need to share personal information relating to its community with third parties, such as professional advisors or relevant authorities, such as the Local Authority.

### **Other Data Sharing**

We will share personal information with law enforcement or other authorities if required by applicable law.

The College may also be required to share information with:

- The Police, for example where we have safeguarding concerns of a serious nature
- With other emergency services if there is an emergency while students are in our care

- Consultants, experts and other professional advisors, eg Ofsted, to assist the College in properly running the college
- Our insurance company, for example if there is an incident on the College site
- Organisations that the College works with to support our students. For example, some organisations may offer support regarding trips we organise or provide work experience activities; and
- Health professionals to effectively meet the health care needs of the student.

The above authorities will have their own policies relating to the protection of any data that they receive or collect.



## POLICY REVIEW AND UPDATES

This policy is subject to regular, at least annual, review to ensure that it remains accurate, effective, and aligned with legal and regulatory changes.

Signed by trustee	Maxine Leigh	Maxine Leigh	6/2/25
Signed by CEO	ANDR EA RANDELL-SMITH	ASR	6/2/25

Reviewed by	Date	Changes made	Next review date
John Hassell	27/2/26	Omission of reference to YR 3 AP.	Feb 27.

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