



# Data Protection & Privacy Policy

## The Odyssey Hub Ltd

### 1. Statement of Commitment

The Odyssey Hub Ltd is committed to protecting the privacy and personal data of all learners, families, staff, volunteers, commissioners, and partners. We comply fully with the [UK General Data Protection Regulation \(UK GDPR\)](#) and the [Data Protection Act 2018](#).

We recognise that we handle sensitive information relating to children and young people, and we take particular care to ensure confidentiality, security, and lawful processing.

### 2. Scope

This policy applies to:

- All personal data collected and processed by The Odyssey Hub Ltd.
- All staff, volunteers, and contractors handling personal data.
- All learners aged 11–25 and their families.
- Commissioners, schools, and local authorities providing or receiving information.

### 3. Principles of Data Protection

The Odyssey Hub Ltd adheres to the following principles:

- **Lawfulness, fairness, and transparency:** Data is processed lawfully and transparently.
- **Purpose limitation:** Data is collected for specified, explicit purposes only.
- **Data minimisation:** Only data necessary for provision is collected.
- **Accuracy:** Data is kept accurate and up to date.
- **Storage limitation:** Data is retained only as long as necessary.
- **Integrity and confidentiality:** Data is stored securely and protected against unauthorised access.

The Odyssey Hub Ltd processes personal data under the lawful bases of legal obligation, public task, and legitimate interests. Special category data is processed in accordance with safeguarding, education, and public interest conditions as set out in UK GDPR.

### 4. Data Collection

We collect personal data including:



- Learner details (name, date of birth, contact information).
- Educational and support needs (EHCP outcomes, SEN information).
- Attendance and progress records.
- Safeguarding information where necessary.

Data is collected directly from families, schools, local authorities, or commissioners.

## 5. Data Storage and Security

- **Records are not stored at external venues.**
- All data is kept securely by The Odyssey Hub Ltd, either:
  - In encrypted digital systems with password protection.
  - In locked cabinets at secure administrative offices.
- Access is restricted to authorised staff only, on a strict need-to-know basis.
- Data is never left unattended or accessible in delivery venues.
- Retention periods are defined in line with statutory guidance and safeguarding requirements. Data is securely destroyed when no longer required

## 6. Data Sharing

- Data may be shared with schools, local authorities, or commissioners where necessary to support provision.
- Safeguarding information may be shared with statutory agencies (social care, police) where required by law.
- Data is never shared with third parties for marketing or commercial purposes.
- All sharing complies with UK GDPR and safeguarding legislation.

## 7. Rights of Data Subjects

Learners, families, and staff have the right to:

- Access their personal data.
- Request correction of inaccurate data.
- Request deletion of data where lawful.
- Restrict or object to processing.
- Data portability (where applicable).

Requests should be made in writing to the Data Protection Officer.

## 8. Data Breach Procedures

- Any suspected data breach must be reported immediately to the Data Protection Officer.



- Breaches will be investigated promptly and, where required, reported to the **Information Commissioner's Office (ICO)** within 72 hours.
- Affected individuals will be informed where there is a high risk to their rights and freedoms.

## 9. Roles and Responsibilities

- **Data Protection Officer (DPO):** Alexandra Mery (contact: [alex@odysseyhub.co.uk](mailto:alex@odysseyhub.co.uk))
- **All Staff:** Responsible for handling data securely and following this policy.
- **Board of Directors:** Ensures compliance and oversight.
- All staff receive data protection awareness training as part of induction and ongoing training.

## 10. Policy Review

- This policy will be reviewed annually, or sooner if legislation changes.
- Updates will be communicated to staff, families, and commissioners.

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**Organisation:** The Odyssey Hub

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**Next review:** 20/01/2027

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