



Data Protection Impact Assessment (DPIA)

The Odyssey Hub Ltd

1. Project / Activity Overview

- **Provision Name:** The Odyssey Hub Ltd – Alternative Provision (SEMH / ASD / Anxiety / School Refusal)
- **Description:** Small-group, narrative-led provision delivered in external venues.
- **Data Processed:** Learner personal details, educational needs, EHCP outcomes, attendance, progress reports, safeguarding information.
- **Purpose of Processing:** To deliver education-led, therapeutically informed provision and monitor outcomes.

2. Data Categories

- **Learner Data:** Name, DOB, contact details, SEN/EHCP information, attendance, progress.
- **Family Data:** Parent/carer contact details, consent forms.
- **Staff Data:** Employment records, DBS clearance, training records.
- **Commissioner Data:** Local authority/school contact details, funding agreements.
- **Safeguarding Data:** Concerns, referrals, reports.

3. Lawful Basis for Processing

- **Contractual necessity:** Provision commissioned by schools/LAs.
- **Legal obligation:** Safeguarding duties under Children Act 1989/2004, Working Together to Safeguard Children.
- **Consent:** Where appropriate (e.g. photos, optional activities).
- **Legitimate interests:** Monitoring and reporting learner progress.

4. Risks Identified

Risk	Likelihood	Severity	Risk Score	Mitigation
Data left at external venue	Unlikely	Major	8	Policy: Records never stored at venues; staff trained to remove all

				devices and materials after sessions.
Unauthorised access to learner records	Possible	Major	12	Encrypted digital storage; locked cabinets; restricted access.
Data breach during transport (e.g. paper files)	Possible	Moderate	9	Minimise paper use; use secure digital systems; staff training
Loss of digital data	Unlikely	Major	8	Regular backups; secure cloud storage; IT support.
Sharing data with unauthorised third parties	Rare	Major	4	Clear data sharing agreements; staff training; DPO oversight.

5. Mitigation Measures

- **Secure Storage:** Encrypted systems, password protection, locked cabinets.
- **Access Control:** Strict need-to-know basis; role-based permissions.
- **Training:** All staff trained in GDPR and confidentiality.
- **Data Minimisation:** Only essential data collected and retained.
- **Retention Policy:** Records kept only as long as necessary (e.g. until learner is 25 for safeguarding).
- **Incident Response:** Breach reporting to DPO and ICO within 72 hours.

6. Data Sharing

- Shared only with schools, local authorities, and statutory agencies where necessary.
- No sharing with third parties for marketing or commercial purposes.
- All sharing documented and logged.



7. Consultation

- Families informed of data use via privacy notices.
- Commissioners provided with data protection assurances.
- External venues consulted to ensure premises do not store or retain records.

8. Sign-Off

- **Assessor Name:**
- **Role:**
- **Date:**
- **Data Protection Officer Approval:**