



21/10/24

Review Date: 21 October 2025

Orchard Academy

www.orchard-academy.com

Data Security, Information Governance, and Privacy Policy

1. Introduction

Orchard Academy is committed to protecting the privacy and security of our students' and staff's personal information. This policy outlines our practices regarding data collection, usage, storage, and sharing, ensuring compliance with applicable laws and regulations.

2. Purpose

The purpose of this policy is to:

- Safeguard personal data against unauthorised access, disclosure, and misuse.
- Ensure compliance with data protection laws.
- Foster trust and transparency with our students, staff, and stakeholders.

3. Scope

This policy applies to all employees, contractors, and third-party service providers who handle personal data on behalf of Orchard Academy.

4. Data Collection

Orchard Academy collects personal information necessary for educational purposes, including:

- Student registration details (name, contact information, date of birth)
- Academic records and assessments
- Payment information (where applicable)
- Communication preferences

5. Data Use

Personal data is used for the following purposes:

- Providing educational services and support.

- Communicating important information regarding courses and policies.
- Processing payments and managing accounts.
- Conducting research and improving our services.

6. Data Storage and Security

Orchard Academy implements the following security measures to protect personal data:

- Data is stored in secure systems with encryption and access controls.
- Regular audits and assessments of our security practices.
- Employee training on data protection and privacy.

7. Data Sharing

Personal data may be shared in the following circumstances:

- With authorised personnel within Orchard Academy for educational purposes.
- With third-party service providers who assist in delivering our services (e.g., payment processors, learning management systems), under strict contractual obligations to protect data.
- As required by law or to protect our rights and safety.

8. Data Retention

Personal data is retained only as long as necessary for the purposes outlined in this policy or as required by law. Data will be securely disposed of when no longer needed.

9. Individual Rights

Individuals have the following rights regarding their personal data:

- Access to their personal data.
- Correction of inaccuracies.
- Deletion of data under certain circumstances.
- Restriction of processing.
- Data portability.

10. Data Breach Response Plan

In the event of a data breach, Orchard Academy has established a response plan to mitigate risks and address any potential harm. The plan includes:

- **Immediate Action:** Reporting the breach to the Data Protection Officer (DPO) without delay.
- **Assessment:** Investigating the breach to determine its scope and impact.
- **Containment:** Taking necessary steps to contain the breach and prevent further unauthorised access.
- **Notification:** Informing affected individuals if the breach poses a risk to their rights and freedoms, as well as reporting to the Information Commissioner's Office (ICO) within 72 hours if required by GDPR.

11. Training and Awareness

Orchard Academy is committed to promoting a culture of data protection and privacy awareness among staff. To achieve this, we:

- Conduct regular training sessions on data protection laws and best practices.
- Provide resources and guidance for staff to handle personal data appropriately.
- Encourage staff to report any concerns or incidents related to data security.

12. Third-Party Risk Management

Orchard Academy recognizes the potential risks associated with sharing personal data with third-party service providers. To mitigate these risks, we:

- Conduct due diligence on third-party vendors to ensure they comply with data protection regulations.
- Include data protection clauses in contracts with third-party service providers to ensure they maintain the confidentiality and security of personal data.

13. Cookies and Tracking Technologies

Orchard Academy may use cookies and similar tracking technologies on our website to enhance user experience and gather information about site usage. We will:

- Provide clear information about the types of cookies used and their purposes.
- Obtain consent from users for the use of non-essential cookies.

14. International Data Transfers

If personal data is transferred outside the UK or the European Economic Area (EEA), Orchard Academy ensures that such transfers comply with data protection laws. We will:

- Use appropriate safeguards, such as Standard Contractual Clauses, to protect personal data during international transfers.
- Ensure that the receiving country provides an adequate level of data protection.

15. Monitoring and Compliance

Orchard Academy will regularly monitor compliance with this policy to ensure that data protection practices are effectively implemented. This includes:

- Periodic audits of data handling processes.
- Reviewing and updating this policy as necessary to reflect changes in legislation or best practices.

16. Feedback and Complaints

We encourage individuals to provide feedback or raise concerns regarding data protection practices. To facilitate this, we:

- Provide clear channels for reporting concerns or complaints.
- Investigate all complaints promptly and thoroughly.

17. Policy Updates

Orchard Academy reserves the right to update this policy as needed. Changes will be communicated through appropriate channels, and the latest version will always be available on our website.

18. Contact Information

For questions or concerns regarding this policy, please contact our Data Protection Officer at:
Orchard Academy
info@orchard-academy.com

This policy reflects our commitment to maintaining the highest standards of data security and privacy. Thank you for choosing Orchard Academy for your educational journey.

Approved by: Management Committee of Orchard Academy

Next Review Date: September 2025