Data Protection and Privacy Policy

Policy Information

Responsible Person	**Wayne Stewart**
Date	**03/09/2026**
Review Date	**03/09/2027**
Review frequency	**Annually**
Version No.	**1.3**

Introduction

The General Data Protection Regulation (GDPR), provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

This document outlines New Roots Workshop CIC's approach and procedures to maintaining compliance with GDPR.

Who We Are:

New Roots Workshop CIC offers young people the opportunity to learn trade based practical skills to support their transition into further education and employment. New Roots Workshop CIC's services are designed to deliver vocational learning in a workshop environment, enabling young people to increase their self-reliance and confidence. Our registered address is New Roots Workshop CIC, Queensgate House, 48 Queen St, Exeter, Devon, EX4 3SR, Company No: 7391206 our ICO registration number is ZB574159.

Definitions

Contact Data: Telephone numbers (mobile and landline); email addresses; postal addresses

Personal Data: Any information (additional to contact data) relating to an identified, or identifiable, individual.

This may include the individuals:

- Name (including initials)
- Identification number
- Date of birth
- Location data
- Online identifier, such as a username

It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.

Sensitive Data: Relates to information concerning a data subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, genetics, biometrics, or details of criminal offences.

Data We Hold

- Contact, personal and sensitive data may be provided to New Roots Workshop CIC by parents and representatives of local authorities, schools, education trusts and/or similar organisations extending care, education and intervention services.
- Contact data may also be provided to New Roots Workshop CIC in the form of distribution lists relating to parties and organisations that may be interested in the services that we provide. It is our understanding that such lists are shared by representatives with the permission of those whose data is contained within the list(s).
- Personal data is shared with New Roots Workshop CIC in the carrying out of our services.
- New Roots Workshop CIC does not collect or store sensitive data.
- Photographs and videos - as part of the delivery of our provision, New Roots Workshop CIC may take photographs and record images of individuals during their sessions. We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. Where we need parental consent, we will clearly explain how the photograph and/or video will be used to both the parent/carer and student. Where we don't need parental consent, we will clearly explain to the pupil how the photograph and/or video will be used.

    - Uses may include:
        - Evidencing outcomes to parents, carers, schools, referring organisations

Registered Office: New Roots Workshop CIC, Queensgate House, 48 Queen Street, Exeter, Devon, EX4 3SR | Company No. 14933996
www.newrootsworkshop.co.uk | contact@newrootsworkshop.co.uk | 07852 322159

        - Within the Workshop on notice boards
        - Outside of the Workshop by external agencies such as newspapers, campaigns
        - Online on our website or social media pages
    - Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.
    - When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

Collection of Data

- Contact data is collected through:
    - Telephone conversations
    - Email enquiries
    - Referrals
    - Website enquiries
    - Social Media enquiries
    - By referral from other contacts (via any of the means above)
- Personal Data is collected in the completion of student Proformas and service level agreements by parents and referring organisations.

Holding/Storage of Data

- All data is held on password protected devices which include mobile telephones and PCs.
- Each member of the New Roots Workshop CIC team is trained on this policy and has confirmed their agreement to maintaining adherence to it.
- Each member of the New Roots Workshop CIC team secures their device to ensure no inadvertent access to the data held thereon.
- New Roots Workshop CIC team members retain client data on their systems with regards to facilitating contact with students, their parents, carers, family members and other authorised parties.

Use/Sharing of Data

- Contact data and personal data is held to facilitate communication with current and potential contacts to deliver intervention provision, arrange meeting times, discuss progress and attendance of students, inform contacts of useful information, and provide updates on our services.
- Contact data and personal data is stored centrally in the New Roots Workshop CIC SharePoint, access to which is limited to only key personnel that require it. Contact information and personal data is not shared with the whole team. Referral forms record and store consent.

Registered Office: New Roots Workshop CIC, Queensgate House, 48 Queen Street, Exeter, Devon, EX4 3SR | Company No. 14933996
www.newrootsworkshop.co.uk | contact@newrootsworkshop.co.uk | 07852 322159

- New Roots Workshop CIC does not share data with third parties without the permission of the individual concerned, unless required to do so for reasons of safeguarding, emergency circumstances or adherence to the law.
- This policy complies with regulation 5 of the Education (Pupil Information) (England) Regulations 2005, which gives parents the right of access to their child's educational record.

Data Access Requests

- Data Access Request should be directed to Wayne Stewart immediately upon receipt.
- Responses will only be provided to individuals that can prove beyond reasonable doubt that they are the subject of the data request.
- This policy outlines an individual's right to be **informed** about how New Roots Workshop CIC uses their data.
- Requests to **access** personal data should be made by the individual concerned and directed to Wayne Stewart. An administration fee may be charged. The individual will need to clearly state what information they want to access.
- New Roots Workshop CIC will **rectify** data held upon notification of a required change or update to the data by the individual concerned. New Roots Workshop CIC may request further information on why the information is inaccurate or incomplete.
- Where New Roots Workshop CIC is required by the individual, or law, to **erase** data held, this will be undertaken.
- Where New Roots Workshop CIC is required by the individual, or law, to **restrict** data held, this will be undertaken.
- Where New Roots Workshop CIC is required by the individual, provide **data portability** to another service provider, this will be undertaken.
- New Roots Workshop CIC will observe an individual's right to **object** to the use of their data. This can be facilitated by reply to any New Roots Workshop CIC communications or opting out of such communications.
- New Roots Workshop CIC does not undertake **automated processing** of data held.

Breaches

In the event of a breach in our data security that puts at risk our records of data held, such breaches will be reported to the ICO and steps taken to prevent a breach from reoccurring.

Registered Office: New Roots Workshop CIC, Queensgate House, 48 Queen Street, Exeter, Devon, EX4 3SR | Company No. 14933996
www.newrootsworkshop.co.uk | contact@newrootsworkshop.co.uk | 07852 322159

In the event of a suspected data breach, the New Roots Workshop CIC team is to report immediately to Wayne Stewart, who will initiate an investigation into the breach and report on its findings to those parties concerned.

Data security will be reviewed and steps put in place to increase security levels. Cloud storage may be suspended, and passwords will be required to be changed.

Website

Please see https://www.newrootsworkshop.co.uk/privacy-policy/ for our website Privacy Notice and information on the collection of cookies.

Registered Office: New Roots Workshop CIC, Queensgate House, 48 Queen Street, Exeter, Devon, EX4 3SR | Company No. 14933996

www.newrootsworkshop.co.uk | contact@newrootsworkshop.co.uk | 07852 322159