

General Data Protection Regulation

GDPR

Data Protection Authority: **Information Commissions Office**

Date Controller: **Dr Hermione Jane Aston**

Data Protection Officer: **Dr Hermione Jane Aston**

Imagine Inclusion Ltd collects data to be used for the following reasons:

- Collaborative consultation
- Gathering information for children & young people within the [Special Educational Needs and Disability Code of Practice 2014](#) within the Graduated Response
- Writing advice towards [Education Health & Care Plan](#) with psychological advices and on-going consultation reviews
- Supervision and Support for adults, staff, parents and carers
- Data is also collected for Therapeutic Services offered such as Integrative Art Therapy and Counselling using the Arts

Information may be collected for research and training, including evaluation. An opt-in option will always be given for this kind of data processing.

Any data collected must have written and signed informed consent, for subjects under 18 years of age, this consent will be gained from parents / guardians. Consent this can be withdrawn at any time by the *data subject*, unless the data has been processed where further and legal action must be taken. Only relevant data will be collected in line with the principals of GDPR.

The *data subject* has the '[Right to be Forgotten](#)' and may ask for all of their data to be deleted. Data will be deleted, securely, unless it may be used for a legal defence in the future or when there is a regulatory obligation to retain the information.

Personal data can be stored if there has been previous business contact.

Data collected will be stored in a safe and secure way at Imagine Inclusion Ltd premises and in accordance with the GDPR.

Key Principals

1) Fair, Lawful and Transparent

Imagine Inclusion Ltd will make it clear and obvious what the *data subject's* data will be used for.

2) Purpose Limitation Principal

Imagine Inclusion Ltd will only use the information gathered for the specified, explicit and legitimate purpose it was gathered. None of the data will be passed onto the Marketing Department, unless consent has been given.

3) Data Minimisation

Imagine Inclusion Ltd will only gather relevant information and will not collect data on the principal that 'it may become useful in the future.'

4) Accuracy

Dr Hermione Aston (Data Controller) is responsible for taking reasonable steps to ensure the data collected is accurate.

5) Data Retention Periods

Imagine Inclusion Ltd will not keep the data longer than it is needed. The data will be kept if it is needed for a legal defence.

6) Data Security

Dr Hermione Aston (Data Controller) is responsible for the data collected and it's safe handling.

7) Accountability

Dr Hermione Aston (Data Controller) is responsible for complying with the data protection principals. Any processors used will have a written binding contract stating that they will comply with the data protection principals and they take on the responsibility of the data when they have or are processing it.

Privacy Policy

What information do we collect?

The information and personal data we collect will vary, depending on your relationship with Imagine Inclusion Ltd.

The information may include contact details so we can respond to you.

The information may be a transaction/ financial based.

The information may be to help or support with Special Educational Need and/or Disability or be related to medical needs.

What we use your information for

Imagine Inclusion Ltd collects data to be used for:

- Collaborative consultation
- Gathering information for children & young people within the [Special Educational Needs and Disability Code of Practice 2014](#) within the Graduated Response
- Writing advice towards [Education Health & Care Plan](#) with psychological advices and on-going consultation reviews
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Information may be collected for research, evaluation and training, an opt-in option will always be given for this kind of data processing.

How we protect your information

Storing and Processing Data Safely

We implement a range of security measures to keep personal information safe. The security system is reviewed on an on-going basis and security is a priority to us. This will be done in line with GDPR and will include (but is not limited to) the following strategies:

- Password protection on the computer, ipad, iphones & Macbook products used.
- Password protection on individual files exchanged.
- Secure document disposal (shred or burn).
- Computer screens away from public view.
- Private telephone conversations in private/ secure area, with headphones in some cases.
- Secure file sharing process ([ProtonMail](#) encrypted email/ I-Cloud with [Boxcryptor](#) High Security for Files and cloud use).
- Virtual and on-line Zoom Conference facilities (see Policy and Guidance document), Microsoft Teams and Iphone.
- Educating staff and volunteers on computer hacking.
- Tangible files will not be in clear plastic folders or open where they can be seen without access to the file.
- Assessment products and data will be stored in secure files.

Disclosure of information

Imagine Inclusion Ltd will not pass on any information without your explicit consent to do so, unless legal requirements require the information to be passed on, this will include safety and welfare.

Imagine Inclusion Ltd may use external data processors. In this case a written binding agreement will be signed before any data is processed to ensure the processor is working in compliance of the data protection principals.

Informed consent

Your consent is key and we will not gather any personal information without clear consent.

Personal Data Collection

Personal data is any information, which personally identifies you. This might include your name, address or email address. The information we collect about you will be processed in accordance with this policy.

The main places we gather personal data are:

- When you register for an event, training or workshop.
- When you use our website and have an enquiry, complement or complaint.
- When you contact us with an enquiry, complement or complaint.
- When you fill in a consent form.

How we use your personal data

When dealing with your enquiries and requests, we may keep the correspondence to ensure we can work as accurately as possible.
Administering orders for paid products, services or both.

Inviting you to provide feedback or partake in future research, this can include surveys we use for research, this will help us to improve our products and services.

Access to your information

If you would like to see what information we have about you, you can request details under the Data Protection Act 1998 and GDPR. To do this, send a description of the information you would like to, with proof of your identity. This can be sent to Imagine.Inclusion@gmail.com.

We charge a fee of £50 for this request, that will be reviewed if this is deemed to be excessive or if you require multiple copies.

You can find out more about your rights under the [Data Protection Act 1998](#) and [General Data Protection Regulation](#).

The [Information Commissioner's Office](#) is the UK Data Protection Authority, more information can be found on their website ico.org.uk

If you have a complaint or any concerns about Imagine Inclusion Ltd data processing then we will aim to resolve these, please contact Imagine.Inclusion@gmail.com.

Compliments and Complaints

Please make any general compliments or complaints to Imagine.Inclusion@gmail.com

All compliments and complaints will be dealt with by Dr Marnie Aston.

Contacting Us

Imagine.inclusion@gmail.com

www.imagineinclusion.co.uk

Training

Imagine Inclusion Ltd guides those who work with and volunteer to what the principals of GDPR mean and how they are put into practice via reading and access to all Imagine Inclusion Ltd Policy and Procedures.

Disposing of Data Safely

The deletion of materials on computer devices used including Apple Macs and Macbooks and deletion of emails and shredding will take place every year.

Breach report system

There are 72 hours to report a breach for Imagine Inclusion Ltd files and systems to ICO if the data taken can be harmful to an individual.

The report will include:

- Description of breach, number and category
- Assessment of likely consequences
- The measures taken to mitigate or remedy the situation

Changes to privacy policy

Changes may be made to this privacy policy.

All changes will be added here. Last updated 10.04.2020.

General Data Protection Regulation

Appointed Processor Agreement

Whilst processing data on behalf of Imagine Inclusion Ltd, the data protection principals should be adhered to firmly.

This includes but is not limited to:


- Working with a confidentiality agreement and confirming no data received from Imagine Inclusion Ltd will be passed on without the consent of Imagine Inclusion Ltd.
- Data security will be kept to the highest level possible and no unsecure documents will be left in an unsafe environment unattended (including not on a password protected computer/ file).
- If the subject requests for the data it must be provided within 30 days.
- After processing data, it must be either safely destroyed or returned back to Imagine Inclusion Ltd in a secure method.

The appointed processor should provide Imagine Inclusion Ltd with the information necessary to demonstrate GDPR compliance.


It is important for the appointed processor to maintain their own records of security, breach reporting and safety procedures, as they are liable for breaches.

In signing this Appointed Data Processor agreement, I am agreeing to abide by the above terms and process data with GDPR compliance.
I am aware that I am liable for any breaches.

Appointed Data Processor

Name Dr Hermione Aston Signed 
Date: 10. April 2020

Data Controller

Name Dr Hermione Aston Signed 
Date: 10. April 2020