



## Data Protection Policy

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| Version          | 1                        |
| Owner            | Audit and Risk Committee |
| Approving body   | Board of Directors       |
| Date approved    | 10 June 2026             |
| Effective from   | 1 July 2026              |
| Review frequency | One year                 |
| Review date      | 1 July 2027              |

See Appendix A for version history

# Data Protection Policy

## **1. Purpose**

- 1.1. This policy sets out the principles, responsibilities, and arrangements that apply to the processing of personal data across Boomsatsuma Education Limited ('Boomsatsuma').
- 1.2. Boomsatsuma processes personal data in the delivery of further and higher education, student support, safeguarding, employment, and associated operational and regulatory activities. The organisation is committed to ensuring that personal data is handled lawfully, fairly, transparently, and securely, and that appropriate safeguards are in place to protect the rights and freedoms of individuals.
- 1.3. Boomsatsuma recognises its obligations under the UK General Data Protection Regulation ('UK GDPR'), the Data Protection Act 2018, and associated legislation relating to privacy and information governance.
- 1.4. Boomsatsuma adopts a proportionate and risk-based approach to data protection governance which reflects the size, nature, and complexity of the organisation and its activities.

## **2. Scope**

- 2.1. This policy applies to the processing of personal data held by Boomsatsuma in electronic and physical records.
- 2.2. This policy applies to personal data relating to applicants, students and learners, parents and guardians, staff, contractors, volunteers, placement students, employers, and external partners.

- 2.3. This policy applies to all staff and individuals working for or on behalf of Boomsatsuma who process personal data as part of their role or responsibilities.

### **3. Definitions**

- 3.1. 'Personal data' means information relating to an identified or identifiable living person who can be directly or indirectly identified from that information, including by reference to a name, identification number, location data, or online identifier.
- 3.2. 'Special category data' means personal data requiring additional protection under legislation. This includes information relating to health, ethnicity, religious beliefs, biometric data, sexual orientation, and political opinions.
- 3.3. 'Processing' means any use of personal data, including collection, storage, sharing, retrieval, amendment, deletion, or destruction.
- 3.4. 'Personal data breach' means a breach of security leading to the accidental or unlawful loss, disclosure, destruction, alteration, or unauthorised access to personal data.

### **4. Principles**

- 4.1. Boomsatsuma will seek to ensure that personal data is processed lawfully, fairly, and transparently, and collected only for specified and legitimate purposes connected with the delivery of its educational, operational, safeguarding, and regulatory activities.
- 4.2. Boomsatsuma will take reasonable steps to ensure that the personal data it processes is relevant, accurate, kept up to date where necessary, and limited to what is needed for the purpose for which it was collected.

- 4.3. Personal data will not be retained for longer than is necessary and will be disposed of securely and appropriately when no longer required.
- 4.4. Boomsatsuma will take reasonable steps to protect personal data against unauthorised access, loss, misuse, disclosure, alteration, or destruction through appropriate security measures and working practices.

## **5. Roles and Responsibilities**

- 5.1. Ultimate responsibility for data protection and information governance sits with the Board of Directors.
- 5.2. The Audit and Risk Committee supports the Board through oversight of data protection risk, information governance, compliance, and associated internal controls across Boomsatsuma's further and higher education provision.
- 5.3. The Executive Committee supports the implementation and day-to-day management of data protection arrangements across the organisation.
- 5.4. The Director of Operations acts as Boomsatsuma's internal lead for data protection and information governance. The role is responsible for coordinating data protection activity, supporting the implementation of this policy, acting as a point of contact for staff and students, and liaising with senior leadership and external advisers where appropriate.
- 5.5. Boomsatsuma may obtain external specialist advice and support in relation to data protection, information governance, regulatory compliance, and complex data protection matters where appropriate.
- 5.6. All staff and individuals working for or on behalf of Boomsatsuma are responsible for handling personal data appropriately, complying with relevant policies and procedures, and reporting suspected breaches or security concerns promptly.

## **6. Personal Data Processed by Boomsatsuma**

- 6.1. In the course of delivering further and higher education, Boomsatsuma processes personal data relating to students, applicants, staff, and other individuals connected with its activities.
- 6.2. This includes personal data processed in connection with admissions, teaching and learning, assessment, safeguarding, student support, placement activity, regulatory reporting, funding requirements, and employment matters.
- 6.3. Some activities involve the processing of special category data, including information relating to health, disability support, safeguarding, and equality monitoring. Boomsatsuma will only process such information where appropriate safeguards and lawful conditions are in place.
- 6.4. Boomsatsuma provides privacy notices to explain how personal data is collected, used, shared, and retained in relation to different activities and categories of individuals. Privacy notices will be reviewed and updated where changes to processing activities or legal obligations require this.

## **7. Lawful Basis for Processing**

- 7.1. Boomsatsuma will process personal data only where there is a lawful basis for doing so under UK GDPR.
- 7.2. Where Boomsatsuma relies on consent as a lawful basis for processing, consent will be sought clearly and transparently and may be withdrawn by the individual at any time where applicable.
- 7.3. Where special category data is processed, Boomsatsuma will ensure that an appropriate lawful condition is identified in accordance with applicable legislation.

## **8. Information Security**

- 8.1. Boomsatsuma will take reasonable steps to keep personal data secure and protect it from loss, misuse, unauthorised access, disclosure, alteration, or destruction.
- 8.2. Measures may include access controls, password protection and Multi-factor Authentication (MFA), secure storage arrangements, staff awareness training, restricted permissions, and appropriate oversight of third-party systems and services.
- 8.3. Individuals processing personal data on behalf of Boomsatsuma must take reasonable steps to ensure that confidential information is handled securely and accessed only where there is a legitimate operational need to do so.
- 8.4. Personal data must only be stored or accessed through authorised systems, devices, and communication channels that are appropriately secured.
- 8.5. Boomsatsuma reserves the right to monitor the use of its systems and services where necessary and proportionate for security, safeguarding, operational, or legal purposes.

## **9. Data Sharing and Third Parties**

- 9.1. Boomsatsuma may share personal data with external organisations where there is a lawful basis and legitimate purpose for doing so. This may include awarding organisations, regulators, funding bodies, placement providers, student support services, and other organisations involved in the delivery, support, or oversight of educational activity.
- 9.2. Personal data will only be disclosed where it is necessary, proportionate, and permitted by applicable legislation.

- 9.3. Where third-party processors are used, Boomsatsuma will seek to ensure that appropriate data processing agreements and security arrangements are in place.

## **10. International Transfers**

- 10.1. Boomsatsuma recognises that some systems and services used to support the delivery of educational and operational activities may involve the processing or storage of personal data outside the UK.
- 10.2. Where personal data is transferred internationally, Boomsatsuma will take reasonable steps to ensure that appropriate safeguards and contractual protections are in place in accordance with applicable data protection legislation.

## **11. Retention and Disposal**

- 11.1. Boomsatsuma recognises the importance of retaining records only for as long as necessary and disposing of information securely and appropriately.
- 11.2. Boomsatsuma maintains arrangements for the retention and disposal of records which reflect legal and regulatory obligations, funding and audit requirements, safeguarding considerations, operational need, and relevant sector guidance.
- 11.3. Information that is no longer required will be securely deleted, destroyed, anonymised, or otherwise securely disposed of.

## **12. Individual Rights**

- 12.1. Individuals have rights under data protection legislation, including the right to:
- Be informed about how their personal data is used

- Request access to personal data held about them through a Subject Access Request (“SAR”)
- Request the correction of inaccurate personal data
- Request the deletion of personal data in certain circumstances
- Object to or restrict the processing of personal data in certain circumstances
- Raise concerns with the Information Commissioner’s Office (‘ICO’).

12.2. Requests relating to personal data rights, including Subject Access Requests, should be submitted to the Director of Operations at [dataprotection@boomsatsuma.com](mailto:dataprotection@boomsatsuma.com).

12.3. Boomsatsuma will aim to respond to Subject Access Requests normally within one month, unless a lawful extension applies. In limited circumstances permitted by law, Boomsatsuma may refuse or charge a reasonable fee for requests that are manifestly unfounded or excessive.

### **13. Data Breaches and Incidents**

13.1. All suspected data breaches, security incidents, or inappropriate disclosures of personal data must be reported promptly to the Director of Operations.

13.2. Reported incidents will be assessed to determine the nature and extent of the issue, any risks to individuals, actions required to contain or address the incident, and whether any further steps or notifications are required. Data breaches may arise from external threats, internal misuse, human error, or failures in systems or processes.

13.3. Boomsatsuma will maintain a record of reported data breaches and security incidents in accordance with its legal and regulatory obligations.

13.4. Where required by law, Boomsatsuma will notify the Information ICO within the required timescales and, where appropriate, affected individuals.



## **14. Training and Awareness**

- 14.1. Boomsatsuma will provide appropriate guidance, training, and awareness activities to support staff in understanding their data protection and information security responsibilities.
- 14.2. Training and awareness arrangements will reflect the nature of an individual's role, level of responsibility, and access to personal data.
- 14.3. Staff are expected to complete any mandatory data protection or information security training required by Boomsatsuma and to apply good information handling practices in their day-to-day work.

## **15. Review**

- 15.1. This Policy will be reviewed periodically by the Audit and Risk Committee to ensure it remains aligned with relevant legislation, regulatory expectations, and provider practice.

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## **Appendix A – Version History**

| Version | Date         | Changes   |
|---------|--------------|-----------|
| 1       | 10 June 2026 | New draft |