

Data Protection Policy

Liberty in the Wild Ltd



Approved by:	Kamilla Woodburn- Minott and Liz Crowford
---------------------	---

Last reviewed on:	September 2025
--------------------------	----------------

Introduction

This policy applies to Liberty in the Wild Ltd and covers all areas of the provision, including The Wilderness, The Woodland and The Wild Meadow.

Liberty in the Wild Ltd is committed to protecting the privacy and security of personal data relating to pupils, parents/carers, staff, volunteers, visitors, contractors and members of the wider provision community.

This policy outlines how personal information is collected, stored, processed, shared and disposed of in accordance with UK data protection legislation.

Liberty in the Wild Ltd recognises the importance of handling personal data lawfully, fairly and securely and is committed to maintaining the confidentiality, integrity and availability of all personal information.

This policy applies to all personal data processed by the provision, regardless of whether the data is held electronically, digitally or in paper format.

This policy should be read alongside the provision's:

- Safeguarding & Child Protection Policy
- E-Safety Policy
- Confidentiality Policy
- Staff Code of Conduct
- Acceptable Use Agreements
- Photography and Video Consent Procedures

This policy is reviewed annually.

1. Aims

Liberty in the Wild Ltd aims to ensure that all personal data collected about staff, pupils, parents/carers, advisors, visitors and other individuals is collected, stored and processed in accordance with UK data protection legislation.

We aim to:

- Ensure personal information is handled lawfully, fairly and transparently
- Protect the rights and privacy of individuals
- Maintain secure systems for storing and processing information
- Ensure staff understand their responsibilities relating to data protection
- Prevent data breaches and respond appropriately where breaches occur
- Ensure appropriate information sharing in line with safeguarding and legal duties

2. Legislation and Guidance

This policy meets the requirements of the:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA 2018)
- Freedom of Information Act 2000
- Protection of Freedoms Act 2012
- Education (Pupil Information) (England) Regulations 2005

This policy is based upon guidance published by the Information Commissioner's Office (ICO), including guidance relating to:

- GDPR compliance
- Data sharing
- Subject access requests
- CCTV and surveillance systems
- Data breaches and reporting procedures

Further guidance can be found via the Information Commissioner's Office:

[Information Commissioner's Office \(ICO\)](#)

3. Definitions

Term	Definition
Personal Data	Any information relating to an identified or identifiable living individual
Special Category Data	More sensitive personal data requiring additional protection, including health, ethnicity, religion, biometric or safeguarding information
Processing	Any action carried out relating to personal data, including collecting, storing, using, sharing or deleting
Data Subject	The individual whose personal data is held
Data Controller	The organisation responsible for deciding how personal data is processed
Data Processor	An organisation or individual processing data on behalf of the data controller
Personal Data Breach	A breach of security leading to accidental or unlawful destruction, loss, disclosure, alteration or unauthorised access to personal data

4. The Data Controller

Liberty in the Wild Ltd processes personal data relating to pupils, parents/carers, staff, visitors, volunteers and others and therefore acts as a Data Controller under UK data protection legislation.

Liberty in the Wild Ltd is registered with the Information Commissioner's Office (ICO) as required by law.

5. Roles and Responsibilities

This policy applies to all staff employed by Liberty in the Wild Ltd, as well as volunteers, contractors and external organisations working on behalf of the provision.

Failure to comply with this policy may result in disciplinary action.

5.1 Advisory Board

The Advisory Board has overall strategic responsibility for ensuring Liberty in the Wild Ltd complies with data protection legislation and good practice.

The Advisory Board will monitor compliance arrangements and support the review of policies and procedures.

5.2 Data Protection Officer (DPO)

The Data Protection Officer (DPO) is responsible for overseeing the implementation of this policy, monitoring compliance with data protection legislation and advising on data protection responsibilities and good practice.

The DPO acts as the first point of contact for:

- Staff
- Parents/carers
- Pupils
- External agencies
- The Information Commissioner's Office (ICO)

The DPO is responsible for:

- Monitoring compliance with UK GDPR

- Advising on data protection responsibilities
- Supporting data breach investigations
- Advising on privacy impact assessments
- Supporting staff training and guidance
- Reviewing policies and procedures

Liberty in the Wild Ltd also utilises external data protection consultancy support through UtiliseData UK to provide additional guidance, compliance support and specialist advice where required.

The Data Protection Officer for Liberty in the Wild Ltd is:

Mrs Kamilla Woodburn-Minott
 Director & Data Protection Officer
kamilla@libertyinthewild.co.uk

5.3 Directors

The Directors are responsible for the day-to-day management of data protection procedures and ensuring this policy is implemented effectively across the provision.

5.4 All Staff

All staff are responsible for:

- Collecting, storing and processing personal data appropriately
- Ensuring confidential information remains secure
- Reporting concerns or breaches immediately
- Updating personal information where necessary
- Following all relevant policies and procedures

Staff must contact the DPO if:

- They are unsure about lawful processing
- They suspect a data breach
- They require advice regarding consent or information sharing
- They are introducing new systems or technologies involving personal data
- They receive a subject access request or other data rights request

6. Data Protection Principles

Liberty in the Wild Ltd will comply with the principles of UK GDPR. Personal data must be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes

- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary
- Processed securely and protected against unauthorised access, loss or disclosure

7. Collecting Personal Data

7.1 Lawfulness, Fairness and Transparency

Liberty in the Wild Ltd will only process personal data where there is a lawful basis to do so under UK GDPR.

Lawful bases may include:

- Consent
- Legal obligation
- Contractual necessity
- Vital interests
- Public task
- Legitimate interests

Where special category data is processed, an additional lawful condition will also be identified in accordance with UK GDPR and the Data Protection Act 2018.

Privacy notices will explain how personal information is used.

7.2 Limitation, Minimisation and Accuracy

Personal data will only be collected where necessary for legitimate purposes relating to the operation of the provision.

Staff must only process personal data required for their role and responsibilities.

Liberty in the Wild Ltd will take reasonable steps to ensure information remains accurate and up to date. Inaccurate or unnecessary information will be corrected, anonymised or securely deleted where appropriate.

8. Sharing Personal Data

Liberty in the Wild Ltd will not normally share personal data without consent unless there is a lawful basis or safeguarding requirement to do so.

Information may be shared where:

- There are safeguarding concerns

- There is a legal obligation
- Emergency services require information
- Local authorities or external agencies require information to support pupils
- Contractors or suppliers require access to provide services

Where data is shared with third parties, Liberty in the Wild Ltd will ensure:

- Appropriate due diligence is undertaken
- Data sharing agreements or contracts are in place
- Only necessary information is shared
- Information is transferred securely

International transfers of data will only occur where lawful safeguards are in place.

9. Subject Access Requests and Individual Rights

Individuals have the right to access personal data held about them.

Requests should be submitted in writing to the Data Protection Officer and should include:

- Full name
- Contact details
- Description of information requested

Liberty in the Wild Ltd will normally respond within one calendar month.

Individuals also have the right to:

- Request correction of inaccurate information
- Request deletion or restriction of data in certain circumstances
- Withdraw consent
- Object to processing
- Request transfer of data
- Complain to the ICO

9.1 Children and Subject Access Requests

Personal data belongs to the child, not the parent/carer.

Children aged 12 and above are generally considered capable of understanding their rights, although each request will be considered individually based upon understanding and capacity.

10. Parental Requests for Educational Records

Parents/carers with parental responsibility have the right to access their child's educational record in accordance with legislation.

Requests should be made in writing to the Directors.

Liberty in the Wild Ltd will respond within 15 school days where applicable.

Certain information may be withheld where disclosure could:

- Cause serious harm
- Breach confidentiality
- Impact safeguarding concerns
- Reveal information relating to another individual

11. Storage of Data

Liberty in the Wild Ltd takes appropriate technical and organisational measures to ensure personal data is stored securely and protected from unauthorised access, misuse, loss or disclosure.

Paper records containing confidential information are stored within locked filing cabinets located within secure offices accessible only to authorised staff.

Electronic data is stored securely using password-protected systems, encrypted devices and secure digital storage arrangements where appropriate.

Confidential information must not be left unattended or accessible to unauthorised individuals.

Records no longer required will be disposed of securely in accordance with retention procedures.

12. Photographs and Videos

Liberty in the Wild Ltd may take photographs or video recordings for educational, promotional or communication purposes.

Written consent will be obtained from parents/carers or pupils aged 18 and above where appropriate.

Photographs and videos may be used:

- Within the provision environment
- On displays or noticeboards
- In newsletters or promotional materials
- On the provision website or social media platforms
- By approved external agencies

Images will not normally be accompanied by identifying personal information unless additional consent has been obtained.

Parents/carers attending events may take photographs for personal use; however, images containing other pupils should not be shared publicly without appropriate consent.

Consent can be withdrawn at any time.

Further information can be found within the Safeguarding & Child Protection Policy.

13. Data Protection by Design and Default

Liberty in the Wild Ltd will ensure data protection is embedded into working practices and procedures.

This includes:

- Appointing a suitably qualified DPO
- Limiting processing to necessary information only
- Conducting data protection impact assessments where appropriate
- Maintaining accurate processing records
- Providing staff training and guidance
- Reviewing systems and procedures regularly
- Ensuring secure international transfers where applicable

14. Data Security and Storage of Records

Liberty in the Wild Ltd will protect personal data against unauthorised access, misuse, alteration, loss or disclosure.

Security measures include:

- Locked storage for paper records
- Password-protected devices and systems
- Encryption of portable devices where appropriate
- Restricted access to confidential information
- Secure disposal procedures
- Staff training and awareness

Confidential information must not be left unattended or visible to unauthorised individuals.

14.1 Remote Working and Personal Devices

Where staff access information remotely or use personal devices, they must ensure that:

- Devices are password protected
- Information is accessed securely
- Confidential information is not downloaded unnecessarily
- Data is not shared using personal email accounts or unauthorised applications

- Screens are not visible to unauthorised individuals

Any loss or theft of devices containing personal information must be reported immediately.

15. Disposal of Records

Personal data no longer required will be disposed of securely and confidentially.

Paper records will be shredded or disposed of using confidential waste arrangements. Electronic records will be securely deleted or overwritten.

Where external contractors are used, Liberty in the Wild Ltd will ensure appropriate data protection guarantees are in place.

16. Personal Data Breaches

Liberty in the Wild Ltd will take all reasonable steps to prevent personal data breaches through appropriate security measures, staff training and monitoring procedures.

A personal data breach includes any incident resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data.

In the event of a suspected or confirmed breach, Liberty in the Wild Ltd will follow the procedures outlined within this policy and comply with reporting requirements under UK GDPR.

Where appropriate, breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours.

Examples of breaches may include:

- Safeguarding information being shared with an unauthorised person
- Loss or theft of devices containing personal information
- Confidential records being emailed incorrectly
- Non-anonymised information being published accidentally

All breaches must be reported immediately to the Data Protection Officer.

17. Training

All staff, volunteers and relevant stakeholders will receive appropriate data protection training as part of induction and ongoing professional development.

Training may include:

- GDPR awareness

- Confidentiality expectations
- Safe information handling
- Cyber security awareness
- Data breach reporting
- Safeguarding and information sharing responsibilities

Training records will be maintained where appropriate.

18. Monitoring Arrangements

The Data Protection Officer is responsible for monitoring and reviewing this policy.

This policy will be reviewed annually and approved by the Advisory Board.

19. Links with Other Policies

This policy should be read alongside all other Liberty in the Wild Ltd policies and procedures relating to safeguarding, confidentiality, online safety, staff conduct and information management, including:

- E-Safety Policy
- Safeguarding & Child Protection Policy
- Confidentiality Policy
- Staff Code of Conduct
- Acceptable Use Agreements
- Photography and Video Consent Procedures

Appendix 1 – Personal Data Breach Procedure

Any staff member, volunteer or contractor who discovers or suspects a personal data breach must immediately inform the Data Protection Officer.

Where appropriate, Liberty in the Wild Ltd may also seek advice and support from its external data protection consultants, UtiliseData UK, particularly in relation to reportable breaches, ICO notifications or complex data protection matters.

All data breaches will continue to be managed internally by the Data Protection Officer, who will determine whether escalation, external advice or ICO notification is required.

The DPO will:

- Investigate the incident
- Assess whether a breach has occurred
- Take steps to contain and minimise risk

- Determine whether the ICO or affected individuals must be informed
- Maintain records of breaches and actions taken
- Review procedures to reduce future risks

Where a breach poses a risk to individuals' rights or freedoms, affected individuals will be informed appropriately and without undue delay.

All breaches, regardless of severity, will be documented and reviewed.

Data Security Breach Reporting Form

Date and time of Notification of Breach	
Notification of Breach to whom Name Contact Details	
Details of Breach	
Nature and content of Data Involved	
Number of individual(s) affected	

Completed forms **must** be returned to Mrs Kamilla Woodburn-Minott at kamilla@libertyinthewild.co.uk

