



Path 4, GDPR Policy

1. Introduction

At **Path 4**, we are committed to safeguarding the personal data of students, parents, staff, and other stakeholders. This General Data Protection Regulation (GDPR) policy outlines how we collect, process, store, and protect personal data in compliance with the UK Data Protection Act 2018 and GDPR.

2. Scope

This policy applies to all personal data processed by Path 4, including data relating to students, staff, parents, contractors, and volunteers. It covers both digital and physical data processing activities.

3. Data Controller

Path 4, located at Unit 1, Waddington St, is the Data Controller. We determine the purpose and means of processing personal data and are responsible for ensuring that data is processed in accordance with applicable laws.

4. Data Protection Principles

We adhere to the following GDPR principles:

- **Lawfulness, Fairness, and Transparency:** We process data lawfully, fairly, and transparently.
- **Purpose Limitation:** Data is collected for specified, legitimate purposes and not processed in ways incompatible with those purposes.
- **Data Minimisation:** We collect only the personal data that is necessary.
- **Accuracy:** We ensure that personal data is accurate and kept up to date.
- **Storage Limitation:** Personal data is kept only as long as necessary for the intended purposes.
- **Integrity and Confidentiality:** We process data securely to protect against unauthorised or unlawful processing, accidental loss, destruction, or damage.

5. Types of Data Collected

We collect the following types of personal data:

- **Student Data:** Name, date of birth, contact details, academic records, health information, and behaviour records.
- **Parent/Guardian Data:** Name, contact details, relationship to student, financial information, and consent records.
- **Staff Data:** Name, contact details, employment records, qualifications, and payroll information.
- **Other Stakeholders:** Contractors, volunteers, and other individuals interacting with the,

6. Legal Basis for Processing

We process personal data based on one or more of the following legal grounds:

- **Consent:** Where required, we seek explicit consent from individuals (e.g., for marketing purposes).
- **Contractual Necessity:** Data is processed as necessary for fulfilling contracts (e.g., employment contracts).
- **Legal Obligation:** Where we are legally required to process data (e.g., safeguarding or reporting obligations).
- **Legitimate Interests:** Processing is necessary for the legitimate interests of the, (e.g., providing education and maintaining safety).
- **Vital Interests:** To protect someone's life in emergencies.

7. How We Use Personal Data

We use personal data for the following purposes:

- Enrolment and registration of students.
- Maintaining educational records and monitoring academic progress.
- Managing student welfare and safeguarding.
- Communicating with parents and guardians.
- Administering HR functions for staff (e.g., payroll, performance management).
- Ensuring health, safety, and security on the premises.

8. Data Sharing

We may share personal data with third parties when:

- Required by law (e.g., with regulatory bodies or local authorities).
- In the interests of safeguarding and welfare (e.g., with social services or health professionals).
- When providing educational services (e.g., with exam boards or external providers).
- Where necessary for the operations (e.g., with IT service providers or auditors).

We ensure that data is shared securely and in compliance with GDPR requirements.

9. Data Retention

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected and in line with statutory requirements. When data is no longer needed, it will be securely destroyed or anonymised.

10. Data Security

We take appropriate technical and organisational measures to ensure the security of personal data, including:

- Password protection and encryption of digital data.
- Physical security measures for paper records.
- Access controls to limit data access to authorised individuals only.
- Regular staff training on data protection.

11. Data Subject Rights

Individuals have the following rights regarding their personal data:

- **Right to Access:** Request access to personal data we hold about them.
- **Right to Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Erasure:** Request the deletion of personal data, where appropriate.
- **Right to Restrict Processing:** Request restriction of data processing in certain circumstances.
- **Right to Data Portability:** Request transfer of their data to another organisation in a structured format.
- **Right to Object:** Object to the processing of their personal data in certain cases (e.g., direct marketing).
- **Rights Related to Automated Decision-Making:** Challenge decisions made solely on automated processes.

12. Consent

Where consent is required, we will obtain explicit, informed consent from individuals (or parents/guardians in the case of students under the age of 16). Consent can be withdrawn at any time by contacting Path 4,

13. Data Breaches

In the event of a data breach, Path 4, will:

- Assess the nature and impact of the breach.
- Notify the Information Commissioner's Office (ICO) within 72 hours if the breach is likely to result in a risk to individuals' rights and freedoms.
- Inform affected individuals if the breach poses a high risk.

- Take immediate steps to mitigate the breach and prevent future incidents.

14. Third-Party Processors

Path 4 may engage third-party processors (e.g., IT service providers) to process personal data on our behalf. All processors are vetted to ensure GDPR compliance, and data-sharing agreements are in place to safeguard personal data.

15. Training and Awareness

All staff members receive regular training on GDPR principles and data protection practices to ensure compliance with this policy.

16. Policy Review

This policy is reviewed annually or when significant changes to data protection laws or, operations occur. The most recent version of the policy will always be available on the Path 4’s website.

17. Contact Information

For any questions regarding this policy or to exercise your data rights, please contact:

Data Protection Officer (DPO)

Path 4,

Unit 1, Ayaan Business Park, Waddington Street, Oldham, OL9 6QH

Email: Alaur@path4.co.uk

Date agreed	21 st August 2025
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Approved by	Moinul Islam MBE (Head of Centre)
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