



Write-Trak Limited

GDPR Policy

2026 – 2027

2. Introduction and purpose

Write-Trak Limited is committed to protecting the privacy, confidentiality and security of personal information relating to pupils, parents and carers, staff, tutors, subcontractors, visitors and other individuals with whom the company works. This policy explains how Write-Trak collects, uses, stores, shares, protects and securely disposes of personal data and the rights individuals have in relation to their information.

Write-Trak is registered with the Information Commissioner's Office (ICO), Z5351716. Anna Turner-Bee is the named person responsible for data protection matters within Write-Trak and is the principal contact.

This policy applies to all employees, tutors, subcontractors, volunteers, directors and other members of the Write-Trak workforce who handle personal data on behalf of the company. It applies whether information is held electronically, on paper, on portable devices, in email systems, in cloud services or in any other format.

3. Main principles

Write-Trak will comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation. The company recognises the seven data protection principles set out in the UK GDPR. These require personal data to 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 handled in accordance with the accountability principle.

Write-Trak accepts responsibility for demonstrating compliance with these principles. The company will maintain appropriate policies, procedures, records, training and technical and organisational measures to demonstrate that data protection is built into its activities rather than treated as an administrative requirement alone.

4. Lawful processing

Write-Trak will identify an appropriate lawful basis for each significant processing activity. Depending on the circumstances, this may include consent, performance of a contract, compliance with a legal obligation, protection of vital interests, performance of a task in the public interest or legitimate interests.

Consent will not automatically be requested where another lawful basis is more appropriate. Where Write-Trak relies on consent, the consent must be freely given, specific, informed and unambiguous, recorded appropriately and capable of being withdrawn.

Write-Trak processes information about children and young adults, and recognises that they require particular care and protection. Personal information relating to them will be processed fairly and in ways that are appropriate to their age, understanding and circumstances. Safeguarding responsibilities will not be made dependent on consent where information can lawfully be shared to protect a child or another person.

5. Special category and safeguarding information

Write-Trak may process special category information, including information concerning health, disability, ethnicity and other protected characteristics, where this is necessary for education, safeguarding, employment, legal or other legitimate purposes and where an appropriate condition for processing applies.

Information relating to safeguarding, child protection, medical needs, EHCPs, PEPs, social care involvement, incidents and behaviour will be treated as confidential and accessed only by those who have a legitimate need to know. Information may be shared without consent where this is necessary and lawful, including where required for safeguarding or to protect the vital interests of an individual.

6. Data controller and data processors

Write-Trak is a data controller, where it determines the purposes and means of processing personal data. A data processor is an organisation or individual that processes personal data on behalf of a controller.

Where Write-Trak uses processors, the company will take reasonable steps to ensure that appropriate contractual arrangements, confidentiality requirements, security measures and data protection responsibilities are in place. Processors will only process personal data in accordance with documented instructions and applicable law.

7. Accountability and compliance

Write-Trak will maintain an appropriate governance structure and will document its data protection arrangements. The company will maintain, as appropriate, records of processing activities, privacy notices, data sharing arrangements, retention arrangements, security measures, breach records, staff training and data protection risk assessments.

The company will ensure that staff and workforce members understand their responsibilities and receive appropriate data protection and confidentiality training. Where processing is likely to result in a high risk to individuals' rights and freedoms, Write-Trak will consider whether a Data Protection Impact Assessment (DPIA) is required.

Write-Trak will keep under review whether it is legally required to appoint a statutory Data Protection Officer (DPO). If the statutory criteria are met, the company will make an appropriate appointment. If a formal DPO is not required, Anna Turner-Bee will continue to act as the company's principal data protection contact unless this arrangement is changed.

8. Data access and individual rights

Individuals have rights in relation to their personal data. Subject to applicable legal exemptions, these include the right to be informed about processing, the right of access, the right to rectification, the right to erasure in appropriate circumstances, the right to restriction of processing, the right to data portability where applicable, and the right to object to certain processing. Individuals also have rights concerning automated decision-making and profiling where applicable.

Requests for access to personal data or a student's educational information should be made to Anna Turner-Bee at anna.turner-bee@writetrak.co.uk. Write-Trak will deal with requests without undue delay and within the statutory time limits. The company may need to verify the identity of the requester and may apply lawful exemptions where appropriate.

Where an individual has concerns about how Write-Trak processes their information, they are encouraged to raise the matter with Write-Trak first. Individuals may also complain to the ICO through its website: <https://ico.org.uk/concerns/>

9. Security of personal data

Write-Trak will take proportionate technical, physical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Security measures may include appropriate access controls, passwords, device security, secure storage, encryption where appropriate, secure transfer arrangements, confidentiality requirements, regular review of access rights, secure disposal and staff training.

Personal information must only be accessed where there is a legitimate work-related reason. Staff and workforce members must not disclose information to unauthorised people and must take particular care when working remotely or using portable devices.

10. Data breaches

A personal data breach includes accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to personal data. Examples include sending information to the wrong recipient, losing a device containing personal data, allowing an unauthorised person to access information, accidental disclosure, malicious access, or loss of availability of data.

Any suspected or actual personal data breach must be reported immediately to Anna Turner-Bee or a Company Director. Staff must not delay reporting because they are uncertain whether an incident constitutes a breach.

Write-Trak will promptly contain and investigate suspected breaches, assess the likely risk to individuals' rights and freedoms, keep an appropriate record and take corrective action. Where notification to the ICO is legally required, Write-Trak will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of the breach. Where a breach is likely to result in a high risk to individuals, affected people will be informed without undue delay where required by law.

11. Data breach reporting and records

Write-Trak will maintain a record of personal data breaches, including incidents that do not require notification to the ICO. Records will include, where appropriate, what happened, when it was discovered, the categories and approximate amount of data

and individuals affected, the likely consequences, actions taken to contain and mitigate the incident, and the reasoning behind any decision to notify or not notify the ICO or affected individuals.

Lessons learned from incidents will be used to improve security, training and procedures.

12. Transport and handling of data

Where staff or members of the Write-Trak workforce need to transport student records or other personal information, they must keep the information secure and under their control. Paper records must not be left visible in unattended vehicles or left unattended in public places such as cafés, bars, libraries or public transport.

Where electronic information is transported, staff must use company-approved or appropriately secured systems and devices. Personal data should not be transferred using insecure or unauthorised methods.

13. Retention and destruction of data

Write-Trak will retain personal data only for as long as it is reasonably necessary for the purpose for which it was collected, taking account of legal, regulatory, safeguarding, educational, contractual, insurance and other legitimate requirements.

The company will maintain appropriate retention arrangements and will review information periodically. The fact that information may be useful in the future is not, by itself, sufficient justification for indefinite retention.

Write-Trak will securely delete or destroy information when it is no longer required. Electronic information will be securely deleted using appropriate methods and paper records will be securely destroyed. Where information must be retained for legal or safeguarding reasons, the reason and applicable retention period should be documented.

14. Accident and incident reports

Write-Trak may keep accident and incident records relating to students, visitors, staff and members of the workforce. Such records may be required for health and safety purposes, safeguarding, insurance, legal claims, complaints, regulatory requirements or potential criminal or civil proceedings.

Information will be retained securely and only for as long as there is a legitimate and documented reason for retaining it.

15. Staff and workforce privacy notice

Write-Trak collects and processes personal information about employees, tutors, subcontractors, volunteers and other individuals or organisations engaged to work for or on behalf of the company.

Information may include names and contact details, employment or engagement information, qualifications, role and teaching information, payroll and tax information, National Insurance details, working hours, absence information, training and safeguarding information and other information necessary to manage the workforce.

Write-Trak uses workforce information to manage employment and contractual relationships, make payments, support recruitment and retention, meet legal and safeguarding requirements, allocate tutors and staff to students, support examination and invigilation arrangements, communicate with parents and carers where appropriate, and meet its responsibilities to schools, local authorities and other education partners.

Some workforce information is mandatory because it is required by law, contract or safeguarding requirements. Where information is genuinely voluntary, Write-Trak will explain this and will not treat voluntary consent as the lawful basis where another lawful basis is more appropriate.

16. Sharing workforce information

Write-Trak may share appropriate workforce information with schools, colleges, independent education providers, local authorities, relevant health or social care services, examination bodies, transport providers, government departments and other organisations where this is necessary, lawful and proportionate.

Information may be shared to meet statutory obligations, support pupil placements, fulfil contractual or educational responsibilities, protect children and vulnerable people, meet examination requirements, administer payroll, respond to legal requirements or support safeguarding.

Write-Trak will not routinely disclose workforce information simply because another organisation requests it. Information will only be shared where there is an appropriate lawful basis and where the disclosure is necessary and proportionate.

17. Student privacy notice

Write-Trak processes personal information about students receiving its services. The information held will depend on the pupil's circumstances and the services provided.

Information may include identity and contact information, date of birth, student identifiers, attendance, educational assessments and results, behaviour and incident information, special educational needs and disability information, EHCPs, PEPs, relevant medical information, safeguarding and child protection information, social care information, examination information, timetabling information and accident or incident records.

Write-Trak uses student information to provide appropriate educational and tutorial support, monitor progress, meet identified educational and safeguarding needs, provide pastoral support, work with schools and other agencies, support transition, comply with legal obligations, support attendance and transport arrangements, and evaluate and improve the services it provides.

18. Sharing student information

Write-Trak may share relevant student information with organisations involved in the student's education, safeguarding, health, welfare or transition where there is a lawful basis to do so.

This may include the student's current or previous school, receiving school or college, local authority education services, health services, social care, attendance and advisory services, youth offending services where relevant, transport providers, examination or training providers and Write-Trak tutors and workforce members.

Information will be shared on a need-to-know basis and only to the extent necessary for the relevant purpose. Safeguarding information may be shared without consent

where the law permits or requires it and where sharing is necessary to protect the student or another person.

19. Students aged 13 and over

Write-Trak may share appropriate information with a local authority or provider of youth support services where this is required or permitted by education legislation and applicable data protection law. This may support youth services, careers advice and education or training arrangements.

Where the law provides a right for a parent or guardian to request that only limited information is shared, Write-Trak will respect that right. Where such rights transfer to the young person, Write-Trak will deal with the young person in accordance with the applicable legal requirements.

20. Confidentiality and need-to-know access

All staff and members of the Write-Trak workforce have a duty to maintain confidentiality. Personal information must not be discussed in public places or disclosed to people who do not have a legitimate reason to receive it.

Information about students, safeguarding matters, medical needs, family circumstances, staff and other individuals should only be accessed and shared where this is necessary for the individual's role and responsibilities. Staff must follow Write-Trak safeguarding, confidentiality, information security and incident reporting procedures.

21. Monitoring, training and review

Write-Trak will provide appropriate data protection information and training to staff and workforce members. Training will cover confidentiality, secure handling of information, phishing and cyber security awareness, data breaches, use of email and portable devices, safeguarding information and individual rights.

The effectiveness of this policy and associated procedures will be reviewed regularly and at least annually. Changes in legislation, ICO guidance, Write-Trak's services,

technology or information-processing arrangements will be taken into account when the policy is reviewed.

22. Contact and complaints

Questions, data protection requests or concerns should be addressed to:

Anna Turner-Bee

Write-Trak Limited

Email: anna.turner-bee@writetrak.co.uk

If an individual remains dissatisfied, they may raise a concern with the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

23. Privacy notice acknowledgement and consent

Write-Trak will not use a general consent form as a substitute for identifying the lawful basis for routine processing. Where consent is genuinely the appropriate lawful basis for a particular activity, Write-Trak will obtain it separately, clearly explain what the consent covers and provide an appropriate method for withdrawal.

A consent or acknowledgement form may nevertheless be used where appropriate to record that an individual has received and understood a privacy notice, or to obtain consent for specific optional processing such as particular forms of communication, where consent is the appropriate lawful basis.

24. Policy Review

Policy review date: August 2026

Next review date: August 2027

Policy owner: Anna Turner-Bee

Approved by: Write-Trak Limited

Version: 2026–2027

26. Appendix 1 – Privacy notice acknowledgement / consent form

Name: _____

Address: _____

Email address: _____

Telephone number: _____

I confirm that I have received and had the opportunity to read the relevant Write-Trak privacy notice. Where Write-Trak has asked me to provide consent for a specific optional use of my personal data, I understand what that consent covers and how I can withdraw it.

Optional communications – please indicate where consent is specifically requested:

Post: _____ Telephone: _____ Email: _____

I confirm that the personal details I have provided are accurate.

Signed: _____

Print name: _____

Date: _____