

## **Equality, Diversity and Data Protection (GDPR)**

### **1. Introduction**

Turning Point Leeds (TPL) is committed to promoting equality, celebrating diversity, and ensuring compliance with all relevant legislation, including the **Equality Act 2010**, **UK General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**.

As an **Alternative Provision (AP)**, TPL works in close partnership with **host schools** and recognises that pupils remain **dual registered**. Safeguarding, equality, and data protection concerns will always be shared immediately and as a matter of urgency with the host school's Designated Safeguarding Lead (DSL).

This policy sets out how TPL eliminates discrimination, promotes inclusion, and ensures the fair, lawful, and transparent processing of personal data. It also demonstrates our compliance with statutory requirements and Leeds City Council guidance.

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### **2. Scope**

2.1 This policy applies to all pupils, staff, volunteers, contractors, parents/carers, host schools, and visitors engaged with TPL.

2.2 It covers all personal data processed by TPL, regardless of format (electronic or paper).

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### **3. Equality and Diversity Commitments**

TPL will:

- Eliminate discrimination, harassment, victimisation, and any conduct prohibited by the Equality Act 2010.
- Advance equality of opportunity for all, particularly those with protected characteristics.
- Foster good relations between different groups, celebrating diversity across our community.
- Ensure equal access to education, support, and activities for pupils, including those with SEND, those looked-after, and those from minority groups.

- Embed equality and inclusion within recruitment, staff development, and pupil support.
  - Conduct equality impact assessments where policies or decisions may affect individuals differently.
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#### 4. GDPR and Data Protection Principles

TPL adheres to the GDPR principles of:

- **Lawfulness, fairness, transparency** – personal data processed lawfully and openly.
  - **Purpose limitation** – data collected only for explicit and legitimate purposes.
  - **Data minimisation** – only necessary data collected.
  - **Accuracy** – data kept accurate and up to date.
  - **Storage limitation** – data retained only as long as necessary.
  - **Integrity and confidentiality** – data kept secure and protected.
  - **Accountability** – TPL demonstrates compliance through policies, training, and audits.
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#### 5. Roles and Responsibilities

- **Directors** – determine how and why data is processed, oversee equality and GDPR compliance, and act as the point of contact with the Information Commissioner's Office (ICO).
    - Contact: Ryan Bradshaw – [ryan@turningpointleeds.co.uk](mailto:ryan@turningpointleeds.co.uk)
  - **Staff, volunteers and contractors** – must comply with this policy and treat all individuals fairly while handling data securely.
  - **Pupils and parents/carers** – expected to respect equality principles and the privacy of others.
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## **6. Lawful Basis for Processing Data**

TPL will process data under lawful bases including:

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

The lawful basis will always be identified before processing begins.

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## **7. Data Subject Rights**

All individuals have the right to:

- Be informed
- Access their data (Subject Access Requests within one month)
- Rectify inaccurate data
- Request erasure (where appropriate)
- Restrict or object to processing
- Data portability
- Rights relating to automated decisions and profiling

Requests must be made in writing to the Directors. Complaints can be raised with the ICO.

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## **8. Data Collection, Sharing and Transfers**

- Data collected will include information necessary for admissions, safeguarding, health and safety, and educational administration.
  - Personal data may be shared with host schools, Leeds City Council, DfE, and relevant agencies when lawful and necessary.
  - No personal data will be transferred outside the UK/EEA unless adequate safeguards are in place.
  - Safeguarding-related data will always be shared with host school DSLs immediately.
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## **9. Data Breach Management**

- TPL has procedures for detecting, reporting and responding to data breaches.
  - Serious breaches will be reported to the ICO within 72 hours.
  - Affected individuals will be notified promptly if their rights are at risk.
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## **10. Privacy by Design and DPIAs**

Data protection is built into all TPL systems and processes. Where processing poses high risks to individuals' rights, **Data Protection Impact Assessments (DPIAs)** will be carried out.

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## **11. Training and Awareness**

- All staff receive training on equality, diversity, GDPR and safeguarding during induction.
  - Annual refresher training is mandatory.
  - Updates are provided when guidance or legislation changes.
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## **12. Monitoring, Compliance and Review**

- Annual audits of equality and data protection compliance will be carried out.
  - Records of processing activities are maintained.
  - Policies are updated in line with statutory requirements and Leeds City Council guidance.
  - The Directors are responsible for annual review.
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### **13. Conclusion**

TPL is committed to promoting equality, celebrating diversity, and protecting personal data in compliance with GDPR. Our approach ensures fairness, transparency, and accountability, while safeguarding pupils' rights and strengthening trust with host schools, parents/carers, and staff.

**Written:** August 2025

**Next Review:** August 2026