Data Protection Policy

Junior Cub Scholars

Last updated: November 2026 Next review: November 2027

Introduction Junior Cub Scholars collects, processes, and stores personal data in order to operate effectively and deliver educational services. This includes information relating to parents/carers, students, tutors, staff, suppliers, and other individuals with whom the organisation has a professional relationship.

This policy explains how personal data must be collected, used, stored, and protected to ensure compliance with data protection legislation and to uphold the rights of individuals.

Junior Cub Scholars is registered with the Information Commissioner's Office (ICO) and is committed to handling personal data lawfully, fairly, and transparently.

Purpose of the Policy

This policy ensures that Junior Cub Scholars:

- Complies with data protection legislation and recognised good practice
- Protects the rights and privacy of children, parents/carers, tutors, and staff
- Is transparent about how personal data is collected and used
- Minimises the risk of data breaches and reputational damage

Legal Framework

This policy is written in accordance with the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Human Rights Act 1998
- Guidance from the Information Commissioner's Office (ICO)

These laws apply to all personal data, whether stored electronically, on paper, or in any other format.

Data Protection Principles

In line with 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
- Kept for no longer than necessary
- Processed in accordance with individuals' rights

- Stored securely and protected against unauthorised or unlawful processing, loss, or damage
- Not transferred outside the UK or European Economic Area unless adequate safeguards are in place

Scope of the Policy

This policy applies to:

- All directors of Junior Cub Scholars
- All employees, tutors, contractors, and volunteers

It applies to all personal data held by the organisation, including but not limited to:

- Names
- Postal addresses
- Email addresses
- Telephone numbers
- Educational and attendance records
- Any other information that can identify an individual

Responsibilities

Directors

The directors of Junior Cub Scholars are collectively responsible for ensuring compliance with data protection legislation and for overseeing the implementation of this policy.

Staff and Tutors

All individuals working on behalf of the organisation are responsible for:

- Handling personal data in line with this policy
- Completing any required data protection training
- Reporting data protection concerns or breaches promptly to the directors

Data Protection Risks

This policy helps reduce risks including:

- Accidental or deliberate breaches of confidentiality
- Inappropriate sharing or misuse of personal data Loss, theft, or unauthorised access to data Reputational and legal consequences following a data breach

General Data Handling Guidelines

- Access to personal data is limited to individuals who require it to perform their role
- Personal data must not be shared informally or without proper authorisation Strong passwords must be used and never shared
- Personal data must not be disclosed to unauthorised individuals, internally or externally

- Data must be reviewed regularly and deleted securely when no longer required
- Any uncertainty regarding data protection must be referred to the directors

Data Storage and Security

Paper Records

- Stored in locked cabinets or secure locations
- Not left unattended or visible to unauthorised individuals
- Shredded securely when no longer required

Electronic Records

- Protected by strong, regularly updated passwords
- Stored only on approved devices, systems, and cloud services
- Regularly backed up and tested
- Protected by up-to-date security software and firewalls
- Removable media must be encrypted or securely locked away

Use of Personal Data

When accessing or using personal data:

- Screens must be locked when devices are unattended
- Data must only be used for legitimate business purposes
- Personal data must not be transferred outside the UK or EEA without appropriate safeguards

Data Accuracy

Junior Cub Scholars will take reasonable steps to ensure personal data is accurate and up to date.

- Data will be stored in as few systems as possible
- Individuals will be encouraged to update their details
- Inaccurate or outdated data will be corrected or deleted promptly

Individual Rights and Subject Access Requests

Individuals have the right to:

- Know what personal data is held about them and why
- Access their personal data Request correction or deletion of their data Restrict or object to processing
- Request data portability where applicable

Subject Access Requests (SARs)

Requests should be made by email to:

juniorcubscholars@gmail.com
Telephone: +44 7547 161699

- A standard form can be provided but is not required
- Identity will be verified before any data is released
- Requests will be responded to within one month, in line with UK GDPR
- No fee will usually be charged unless the request is excessive or repetitive

Disclosure of Data Personal data may be disclosed without consent where legally required, including requests from law enforcement or safeguarding authorities.

Any such disclosure will be assessed by the directors to ensure it is lawful and proportionate.

Transparency and Fair Processing

Junior Cub Scholars ensures individuals are informed about:

- What data is collected
- How it is used
- Their rights under data protection law

This information is provided through privacy notices and contractual documentation.

GDPR Compliance and Data Breaches

Junior Cub Scholars complies fully with UK GDPR requirements.

- Personal data is only shared internally on a need-to-know basis, including with tutors where necessary to deliver services
- The organisation does not send unsolicited marketing communications
- Data breaches will be reported to the ICO without undue delay and, where required, within 72 hours

Individuals affected by a data breach will be informed where there is a high risk to their rights or freedoms.

Right to Erasure

Individuals have the right to request deletion of their personal data where it is no longer required or where there is no lawful basis for processing.

Requests should be made to juniorcubscholars@gmail.com and will be handled in line with legal requirements.

Policy Review

This policy will be reviewed annually or sooner if there are changes in legislation, guidance, or organisational practice.

Approved by the Directors of Junior Cub Scholars