

Quest for Learning

Information Governance and Data Protection Policy

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Quest for Learning Governance Framework

This document forms part of Quest for Learning's Governance Framework.

Level 1 – Policies

Policies define the Charity's principles, governance arrangements, responsibilities and organisational expectations.

Level 2 – Procedures & Guidance

Procedures and guidance explain how policies are implemented in practice.

Level 3 – Forms, Registers & Templates

Forms, registers and templates provide the records and evidence required to demonstrate compliance.

1. Purpose and scope

Information is one of Quest for Learning's most valuable organisational assets.

Every day the Charity collects, uses, stores and shares information that enables us to support children, work with schools, engage volunteers and supporters, employ staff, meet our legal obligations and demonstrate the impact of our work.

The trust placed in Quest for Learning by children, families, schools, funders, volunteers, staff and partners depends upon our ability to manage information responsibly, securely and lawfully. Good information governance is therefore fundamental to maintaining confidence in the Charity, protecting individual rights and ensuring the effective delivery of our charitable objectives.

Quest for Learning is committed to maintaining the highest standards of information governance and complying with all applicable data protection legislation. We recognise that protecting personal information is not simply a legal obligation but an essential part of delivering our charitable mission responsibly and ethically.

Quest for Learning only collects the information it needs, uses it responsibly, protects it appropriately and retains it only for as long as necessary. These principles underpin our approach to information governance and reflect the trust placed in us by the children, families, schools, supporters, staff, volunteers and partners we serve.

This policy sets out the Charity's approach to information governance by:

- establishing the principles governing the management of information;
- defining organisational responsibilities;
- setting expectations for all individuals working on behalf of the Charity;
- ensuring compliance with applicable legislation;
- supporting consistent and proportionate decision-making.

This policy applies to:

- Trustees;
- employees;
- freelance tutors;
- volunteers;
- contractors;
- consultants;
- agency workers;
- anyone processing information on behalf of Quest for Learning.

The policy applies equally to information held electronically, on paper, verbally or in any other format.

This policy does not form part of any contract of employment and may be amended by the Charity where necessary.

2. Legislative and regulatory framework

Quest for Learning will manage information in accordance with applicable legislation and recognised good practice, including:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Privacy and Electronic Communications Regulations (PECR), where applicable;
- Freedom of Information legislation where relevant to contractual arrangements with public bodies;
- Charity Commission guidance;
- Information Commissioner's Office (ICO) guidance and Codes of Practice.

Where legislation changes, this policy will be interpreted and updated accordingly.

3. Policy statement

Quest for Learning believes that responsible information governance is fundamental to maintaining the confidence of everyone who places their trust in the Charity.

We are committed to ensuring that personal information is managed lawfully, fairly, transparently and securely throughout its lifecycle. We will only process information for legitimate purposes, keep it accurate, protect it appropriately and retain it only for as long as necessary.

We recognise that information governance extends beyond legal compliance. It supports safeguarding, effective service delivery, organisational learning, sound decision-making and public confidence.

The Charity therefore commits to ensuring that:

- personal information is handled lawfully, fairly and transparently;
- privacy is respected throughout the organisation;
- information is protected from unauthorised access, disclosure, alteration or loss;
- staff receive appropriate training and guidance;
- information governance is embedded within organisational planning and decision-making;
- any failures are identified promptly, investigated appropriately and used to improve future practice.

4. Information Governance Principles

Quest for Learning's approach to information governance is founded upon eight core principles.

4.1 We only collect the information we need

The Charity will only collect personal information that is necessary to fulfil a legitimate organisational purpose.

Information will not be collected "just in case" it may be useful in the future.

4.2 We are open about why we collect information

Individuals have the right to understand:

- what information is collected;
- why it is collected;
- how it will be used;
- who it may be shared with;
- how long it will be retained;
- their rights in relation to that information.

This information will normally be communicated through appropriate Privacy Notices.

4.3 We only use information for legitimate purposes

Personal information will only be processed where there is an appropriate lawful basis under UK GDPR.

These lawful bases may include:

- consent;
- performance of a contract;
- compliance with a legal obligation;
- protection of vital interests;
- performance of a task carried out in the public interest;
- legitimate interests.

Where consent is relied upon, it must be freely given, informed, specific and capable of being withdrawn.

4.4 We keep information accurate

Reasonable steps will be taken to ensure that personal information remains accurate, complete and up to date.

Where inaccuracies are identified they will be corrected promptly.

4.5 We protect information appropriately

The Charity will implement proportionate technical and organisational measures to protect information against:

- accidental loss;
- unauthorised access;
- unlawful disclosure;
- alteration;
- destruction.

Security measures will reflect the sensitivity of the information involved.

4.6 We only keep information for as long as necessary

Information will be retained only for legitimate business, legal or regulatory purposes.

Retention periods are defined within the **Records Management, Retention and Disposal Policy** and associated retention schedule.

4.7 We remain accountable

The Charity accepts responsibility for demonstrating compliance with data protection legislation.

Information governance considerations will be incorporated into organisational planning, procurement, new systems, projects, partnerships and service development to ensure that privacy and accountability are embedded in organisational decision-making.

4.8 We continually improve

Information governance is an ongoing organisational responsibility.

The Charity will:

- monitor compliance;
- review incidents;
- learn from mistakes;
- update procedures where required;
- provide regular training;
- continually strengthen information governance arrangements.

5. Roles and responsibilities

Effective information governance depends upon everyone working for or on behalf of Quest for Learning understanding and fulfilling their responsibilities. While specific responsibilities differ according to role, all individuals are expected to understand and comply with this policy and the supporting procedures.

5.1 Board of Trustees

The Board of Trustees has overall accountability for ensuring that Quest for Learning maintains appropriate arrangements for information governance and complies with its legal and regulatory obligations.

The Board is responsible for:

- approving this policy and any significant amendments;
- ensuring appropriate governance arrangements are in place;
- overseeing significant information governance risks through the Charity's Risk Management Framework;
- receiving assurance that appropriate controls, training and monitoring arrangements are operating effectively;
- ensuring sufficient resources are available to support effective information governance.

The Board delegates day-to-day operational responsibility for information governance to the Chief Executive.

5.2 Chief Executive

The Chief Executive has overall responsibility for implementing this policy and embedding good information governance throughout the Charity.

This includes responsibility for:

- promoting a culture of responsible information management;
- ensuring appropriate procedures, guidance and controls are maintained;
- assigning responsibility for operational information governance and data protection activities;
- ensuring staff and volunteers receive appropriate training;
- ensuring appropriate records are maintained to demonstrate compliance;
- ensuring appropriate action is taken following information governance incidents;
- reporting significant risks or breaches to the Board where appropriate.

5.3 Data Protection Lead

The Chief Executive will designate an appropriate individual to oversee day-to-day data protection activities. Depending on the size and structure of the Charity, this responsibility may be undertaken by the Chief Executive or delegated to another member of staff.

The Data Protection Lead is responsible for:

- providing advice and guidance on data protection matters;
- maintaining information governance documentation;
- overseeing responses to Subject Access Requests and other rights requests;
- coordinating the management of personal data breaches;
- maintaining the Record of Processing Activities (ROPA);
- monitoring compliance with this policy;
- acting as the principal point of contact with the Information Commissioner's Office (ICO), where appropriate.

5.4 Data Protection Officer

Quest for Learning has considered its obligations under UK GDPR in relation to the appointment of a statutory Data Protection Officer (DPO).

Having regard to the nature, scale and purposes of its processing activities, the Charity has determined that it is not currently required to appoint a statutory DPO.

Instead, the Charity has designated a Data Protection Lead to oversee day-to-day compliance with this policy, coordinate information governance activities and act as the principal internal point of contact for data protection matters.

This position will be reviewed periodically and whenever there are significant changes to the Charity's activities or legal obligations.

5.5 Managers

Managers are responsible for ensuring that information governance requirements are implemented within their areas of responsibility.

Managers must:

- ensure staff understand their responsibilities;
- promote good information handling practices;
- ensure confidential information is stored securely;
- identify and report information governance risks;

- ensure information is retained and disposed of appropriately;
- support investigations into data breaches or incidents where required.

5.6 Employees, Tutors, Volunteers and Contractors

Everyone working on behalf of Quest for Learning has an individual responsibility to protect information.

All individuals must:

- comply with this policy and supporting procedures;
- complete mandatory information governance training;
- only access information required for their role;
- keep information secure at all times;
- report suspected data breaches immediately;
- protect passwords and authentication credentials;
- ensure confidential conversations cannot be overheard by unauthorised persons;
- follow the Charity's procedures for remote working, information handling and records management.

Failure to comply with this policy may result in disciplinary action, termination of contractual arrangements or, where appropriate, referral to regulatory or law enforcement authorities.

6. Managing information

Quest for Learning manages information throughout its entire lifecycle, from collection to secure disposal.

The Charity aims to ensure that information is managed consistently, proportionately and securely at every stage.

6.1 Collection of information

The Charity will only collect personal information that is necessary to deliver its charitable purposes, fulfil contractual obligations or meet legal and regulatory requirements.

Before collecting personal information, consideration should be given to:

- whether the information is genuinely required;
- whether a lawful basis exists;
- whether individuals have been informed appropriately;

- whether less information could achieve the same purpose.

Where possible, information should be collected directly from the individual concerned.

6.2 Lawful processing

All processing of personal data must be supported by an appropriate lawful basis under UK GDPR.

Quest for Learning will clearly identify the lawful basis relied upon for each category of processing and record this where appropriate.

Where processing involves Special Category Data or Criminal Offence Data, an additional lawful condition must also be satisfied.

6.3 Privacy by design

Quest for Learning will consider information governance and data protection requirements whenever new systems, programmes, projects, technologies or ways of working are introduced.

Privacy considerations should be incorporated at the earliest possible stage of planning rather than being addressed retrospectively.

Where appropriate and proportionate to the nature of the activity, new processes will be designed to:

- minimise the personal information collected;
- limit access to those who require it;
- protect confidentiality and security;
- support transparency;
- demonstrate compliance with applicable legislation.

6.4 Data Protection impact assessments

Where proposed processing activities are likely to result in a high risk to the rights and freedoms of individuals, Quest for Learning will undertake a Data Protection Impact Assessment (DPIA) before processing begins.

DPIAs help identify and reduce privacy risks before new activities are implemented and support the Charity's commitment to responsible information governance.

Further guidance on completing DPIAs is provided within supporting procedures where appropriate.

6.5 Special Category Information

Quest for Learning works with children and families and may process Special Category Data where necessary to deliver educational programmes, fulfil safeguarding responsibilities or meet legal obligations.

Such information may include, for example:

- health information;
- disability information;
- ethnicity;
- first language;
- educational support needs.

Special Category Data will only be processed where:

- it is genuinely necessary;
- appropriate safeguards are in place;
- access is restricted to those with a legitimate need to know;
- suitable security measures are maintained.

The Charity recognises that some categories of personal information require particularly careful handling due to the potential impact on individuals if disclosed inappropriately.

6.6 Information security

Quest for Learning will implement proportionate organisational and technical measures to protect information from unauthorised access, accidental loss, destruction or misuse.

These measures may include:

- password protection;
- multi-factor authentication where available;
- encryption;
- secure cloud storage;
- appropriate user access controls;
- secure disposal of confidential waste;
- secure backup arrangements;
- appropriate physical security.

Security measures will be reviewed periodically to ensure they remain proportionate to organisational risks.

6.7 Access to information

Access to personal information will be restricted according to business need. Individuals should only access information required to undertake their role.

Sharing login credentials or permitting unauthorised access to systems is strictly prohibited.

Where staff leave the Charity or change roles, system access will be reviewed promptly.

6.8 Sharing information

Information will only be shared where there is:

- a legitimate organisational need;
- an appropriate lawful basis;
- adequate safeguards;
- confidence that the receiving organisation will protect the information appropriately.

Information sharing should always be proportionate. Only the minimum necessary information should be disclosed.

Where information is shared with external organisations on a routine basis, appropriate agreements should normally be established.

6.9 Third-party processors

Quest for Learning uses third-party organisations to provide services including information technology, communications, payroll and other business functions.

The Charity remains accountable for personal information processed on its behalf and will take reasonable steps to assure itself that third-party processors maintain appropriate standards of security and compliance.

Before engaging a processor, the Charity will take reasonable steps to ensure that the organisation:

- provides appropriate security measures;
- complies with UK GDPR;

- processes information only on documented instructions;
- maintains appropriate contractual safeguards.

Written agreements will be established where required by legislation.

6.10 Remote working

The Charity recognises that staff and tutors regularly work across schools, home environments and other locations.

Appropriate precautions must therefore be taken to protect information when working away from the office.

Individuals must follow the **Remote Working Guidance** and **Information Handling Guidance**, including requirements relating to:

- secure storage of paper records;
- password protection;
- use of approved devices;
- preventing unauthorised viewing of confidential information;
- secure disposal of documents;
- reporting lost or stolen equipment.

Remote working should never reduce the standard of information security expected within the Charity.

6.11 Records management

Information should be organised, stored and maintained so that it remains accurate, accessible and reliable throughout its lifecycle.

Records should be:

- created consistently;
- stored securely;
- retained in accordance with approved retention periods;
- disposed of securely when no longer required.

Detailed arrangements are set out within the **Records Management, Retention and Disposal Policy**.

6.12 Retention and disposal

Quest for Learning will not retain personal information indefinitely.

Retention periods are determined by:

- legal requirements;
- regulatory expectations;
- operational need;
- safeguarding considerations;
- financial and audit requirements.

Once retention periods expire, information will be securely destroyed or permanently anonymised unless there is a lawful reason for continued retention.

Secure disposal applies equally to electronic information, paper records and portable media.

7. Individual Rights

Quest for Learning is committed to respecting and protecting the rights of individuals in relation to their personal information. We recognise that transparency, fairness and accountability are fundamental to maintaining the trust of the children, families, schools, supporters, staff, volunteers and partners who engage with the Charity.

The Charity will ensure that requests relating to personal information are handled promptly, fairly and in accordance with UK data protection legislation.

The Charity maintains a Subject Access Request Log to record requests received, monitor statutory response times and demonstrate compliance with UK data protection legislation.

Individuals have the right to request information about how their personal data is processed and, where applicable, exercise the rights described below.

7.1 Right to be informed

Individuals have the right to understand:

- what personal information is collected;
- why it is collected;
- the lawful basis for processing;
- how it will be used;
- who it may be shared with;
- how long it will be retained;
- how to exercise their rights.

Quest for Learning will normally provide this information through clear and accessible Privacy Notices.

7.2 Right of access

Individuals may request access to the personal information held about them by making a Subject Access Request (SAR).

The Charity will:

- verify the identity of the requester where appropriate;
- respond within the statutory timescales;
- provide information in an accessible format where reasonably practicable;
- withhold information only where permitted by law.

Detailed guidance is provided within the Subject Access Request Procedure and supporting documentation.

7.3 Other individual rights

Where applicable, individuals may also request:

- correction of inaccurate personal information;
- deletion of personal information where there is no lawful reason for continued processing;
- restriction of processing;
- transfer of certain information to another organisation;
- objection to particular forms of processing;
- review of certain automated decision-making.

Each request will be considered on its own merits and in accordance with applicable legislation.

The Charity recognises that these rights are not absolute and may be limited where legal exemptions apply.

7.4 Complaints

Individuals who are dissatisfied with how their personal information has been handled are encouraged to raise their concerns with Quest for Learning in the first instance so that they can be investigated and, where appropriate, resolved promptly.

Individuals also have the right to complain to the Information Commissioner's Office (ICO).

8. Data incidents and personal data breaches

Quest for Learning recognises that, despite appropriate safeguards, information security incidents may occasionally occur.

The Charity is committed to responding promptly, proportionately and transparently to any actual or suspected personal data breach in order to minimise harm, protect individuals and meet its legal obligations.

8.1 Reporting Incidents

Everyone working for or on behalf of Quest for Learning has a responsibility to report any actual or suspected information security incident or personal data breach immediately.

Examples include, but are not limited to:

- information sent to the wrong recipient;
- loss or theft of devices containing personal information;
- unauthorised access to confidential information;
- accidental disclosure of personal information;
- cyber security incidents;
- loss of paper records;
- inappropriate sharing of confidential information.

Individuals should never assume that an incident is too minor to report. Prompt reporting enables the Charity to assess risk and take appropriate action.

8.2 Responding to breaches

On becoming aware of a suspected breach, the Charity will:

- assess the nature of the incident;
- take immediate action to contain any ongoing risk;
- investigate the circumstances;
- assess the potential impact on affected individuals;
- determine whether notification to the Information Commissioner's Office or affected individuals is required;
- identify lessons learned;
- implement improvements where necessary.

The Charity will maintain appropriate records of all significant information governance incidents, including those that do not require notification to the ICO. Detailed operational arrangements are set out within the **Data Breach Procedure**.

8.3 Learning and improvement

Quest for Learning is committed to learning from information governance incidents.

Following any significant incident, consideration will be given to whether improvements are required to:

- policies;
- procedures;
- technical controls;
- staff training;
- organisational processes;
- contractual arrangements.

Where appropriate, lessons learned will be shared across the organisation to reduce the likelihood of similar incidents occurring in the future.

9. Training, monitoring and compliance

Maintaining effective information governance requires ongoing awareness, training and assurance.

Quest for Learning is committed to embedding good information governance throughout the organisation by ensuring that individuals understand both their legal responsibilities and the Charity's expectations.

9.1 Training

Appropriate information governance training will be provided to individuals whose roles involve handling personal information.

Training may include:

- induction training;
- periodic refresher training;
- role-specific guidance;
- updates following legislative or procedural changes;
- learning arising from incidents or audits.

Individuals are expected to apply this learning in their day-to-day work and seek advice whenever they are uncertain.

9.2 Monitoring

The Charity will monitor the effectiveness of its information governance arrangements through a range of proportionate assurance activities, which may include:

- internal reviews;
- compliance checks;
- audits;
- review of information governance incidents;
- monitoring of Subject Access Requests and other rights requests;
- review of data retention arrangements;
- periodic review of information asset registers and records of processing activities.

Monitoring is intended to provide assurance to the Charity, support continuous improvement and demonstrate compliance with legal and regulatory obligations.

9.3 Compliance

Failure to comply with this policy or supporting procedures may expose individuals, the Charity and the people we support to significant risk.

Breaches of this policy may result in:

- additional training;
- management action;
- disciplinary action;
- termination of volunteer or contractual arrangements;
- referral to regulatory authorities where appropriate.

Where breaches result from organisational weaknesses rather than individual failings, the Charity will focus on improving systems, processes and training to reduce future risk.

10. Related documents

This policy should be read alongside the following Quest for Learning governance documents:

Governance Framework

- Information Governance Framework

Level 1 Policies

- Records Management, Retention and Disposal Policy
- Safeguarding Policy
- Risk Management Policy
- Health and Safety Policy
- Equality, Diversity and Inclusion Policy

Level 2 Procedures and guidance

- Data Breach Procedure
- Remote Working Guidance
- Information Handling Guidance

Level 3 Forms and registers

- Data Breach Report Form
- Subject Access Request Form
- Information Asset Register
- Record of Processing Activities (ROPA)

External documents

- Workforce Privacy Notice
- Pupil, Parent and Carer Privacy Notice
- Volunteer Privacy Notice
- Supporter Privacy Notice
- Website Privacy Notice

11. Review

This policy will be reviewed every two years, or sooner where:

- there are significant changes to legislation or regulatory guidance;
- organisational changes affect information governance arrangements;
- significant information governance incidents identify the need for revision;
- monitoring or audit activities identify opportunities for improvement.

Minor amendments that do not materially alter the intent of the policy may be approved by the Chief Executive.



Material amendments will be submitted to the Board of Trustees for approval.

Quest for Learning believes that responsible information governance is fundamental to protecting the people we support, maintaining public confidence and delivering our charitable mission. Every person working on behalf of the Charity has a role in ensuring that information is managed responsibly, securely and with integrity.