



1. Introduction

Pinnacle-AP is committed to protecting the privacy and security of personal data. This policy outlines our procedures for handling personal data in compliance with relevant data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Principles

Pinnacle-AP adheres to the following data protection principles:

- **Lawfulness, fairness, and transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner.
- **Purpose limitation:** Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data minimisation:** Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Personal data will be accurate and, where necessary, kept up to date.
- **Storage limitation:** Personal data will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- **Integrity and confidentiality:** Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

3. Scope

This policy applies to all staff, volunteers, and any other individuals who process personal data on behalf of Pinnacle-AP. It covers all personal data processed by Pinnacle-AP, regardless of the format in which it is held.

4. Data Collection and Use

Pinnacle-AP collects and processes personal data for various purposes, including:

- Student administration and education
- Staff administration and management
- Safeguarding and welfare
- Communication with parents/carers and other stakeholders
- Compliance with legal obligations



We will only collect and use personal data that is necessary for these purposes.

5. Data Security

Pinnacle-AP takes the security of personal data seriously. We have implemented appropriate technical and organizational measures to protect personal data against unauthorized or unlawful processing and against accidental loss, destruction, or damage. These measures include:

- Access controls
- Data encryption
- Regular backups
- Staff training on data protection

6. Data Sharing

Pinnacle-AP may share personal data with third parties where it is necessary for the purposes outlined in section 4. This may include sharing data with:

- Mainstream schools
- Local authorities
- Safeguarding agencies
- Sholing FC (as per the Business Proposal)
- Other relevant organizations

We will only share personal data where we have a lawful basis for doing so and will ensure that appropriate safeguards are in place.

7. Data Retention

Pinnacle-AP will only retain personal data for as long as is necessary for the purposes for which it was collected. We have a data retention schedule that outlines the retention periods for different types of data.

8. Data Subject Rights

Individuals have certain rights in relation to their personal data, including the right to:

- Access their personal data
- Rectify inaccurate data
- Erase their personal data
- Restrict processing of their personal data
- Object to processing of their personal data
- Data portability



Pinnacle-AP will respond to requests to exercise these rights in accordance with data protection legislation.

9. Responsibilities

- Rhonda Thomas (as Designated Safeguarding Lead) is responsible for overseeing data protection within Pinnacle-AP.
- All staff are responsible for complying with this policy and ensuring the security of personal data.

10. Review Date

5/5/26

This policy will be reviewed annually and updated as necessary.

Rhonda Thomas

Pinnacle-AP