

Data protection policy and procedures

Lunar Hub

Organisation: Lunar Hub

Policy owner: Lunar Hub Leadership Team

Date reviewed: May 2026

Next review date: May 2027

Applies to: All staff, learners, volunteers, and contractors



1. Purpose

Lunar Hub is committed to handling personal data safely, securely, and in line with UK data protection law. This policy explains how we collect, store, use, and share personal data relating to learners, families, staff, and commissioning bodies.

The aim is to ensure all information is managed lawfully, fairly, and transparently.

2. Legal framework

This policy is based on:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Keeping Children Safe in Education (where relevant safeguarding information is held)

3. Data we collect

Lunar Hub may collect and process the following types of information:

- learner personal details (name, date of birth, contact information)
- school and commissioning body information
- attendance records
- academic progress and reports
- SEND information, including EHCPs where applicable
- behaviour and wellbeing information
- safeguarding information where relevant
- staff records (including DBS and training records)

4. How we use data

Personal data is used only where necessary for legitimate educational and safeguarding purposes, including:

- delivering education and support services
- monitoring attendance and engagement
- reporting progress to schools and local authorities

- safeguarding learners and managing welfare concerns
 - meeting legal and contractual obligations
 - maintaining internal records for quality assurance
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5. Data sharing

Lunar Hub may share information with:

- commissioning schools
- local authorities
- safeguarding partners (e.g. children's social care, police where required)
- health or education professionals involved in the learner's support

Data will only be shared where necessary, relevant, and lawful.

We do not sell or share data for marketing purposes.

6. Data security

Lunar Hub takes appropriate technical and organisational measures to protect personal data, including:

- secure storage of digital records (password-protected systems)
 - restricted access to sensitive information on a need-to-know basis
 - secure handling of paper records
 - safe disposal of confidential information when no longer required
 - staff awareness of confidentiality requirements
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7. Data retention

Data is retained only for as long as necessary for educational, safeguarding, and legal purposes.

Retention periods may vary depending on the type of record, but information will not be kept longer than required.

8. Individual rights

Under data protection law, individuals have the right to:

- access their personal data
- request correction of inaccurate data
- request deletion of data (where applicable)
- object to certain types of processing
- request restriction of processing

Requests should be made in writing to Lunar Hub leadership.

9. Safeguarding and confidentiality

Where safeguarding concerns exist, information may be shared without consent where there is a legal basis to do so, in line with child protection procedures.

Confidentiality will always be respected, but it is not absolute where a learner may be at risk of harm.

10. Staff responsibilities

All staff must:

- handle personal data securely at all times
- only access information required for their role
- not share data informally or outside approved systems
- report any data breaches immediately
- follow confidentiality expectations at all times

All staff receive guidance on data protection as part of their induction.

11. Data breaches

Any suspected or actual data breach must be reported immediately to Lunar Hub leadership.

Where required, breaches will be assessed and reported to the Information Commissioner's Office (ICO) in line with legal requirements.

12. Monitoring and review

This policy will be reviewed annually or sooner if legislation or operational changes require it.