Great Minds Dyslexia Services CIC
GDPR & Privacy Policy

Effective date: 1st September 2026
Last reviewed: Initial policy.
Next review date: 1st August 2027
Data Protection Leads: Amy Appleton and Laura Furniss
ICO registration: Great Minds Dyslexia Services CIC is registered with the Information Commissioner's Office (ICO).

1. Introduction
Great Minds Dyslexia Services CIC provides dyslexia assessment services to children and young adults in East Yorkshire and surrounding areas.
We take the privacy and security of the personal information entrusted to us seriously. This policy explains what personal information we collect, why we collect it, how we use and protect it, who we may share it with, how long we retain it and the rights individuals have in relation to their personal information.
We comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.
Because our services involve children and young people and may involve information concerning health, additional care is taken when collecting, using and storing this information.

2. Who is responsible for your personal information?
Great Minds Dyslexia Services CIC is the data controller for the personal information we collect and process in connection with our dyslexia assessment services.
Our Data Protection Leads are:

- Amy Appleton
- Laura Furniss

They are responsible for overseeing our approach to data protection and ensuring that personal information is handled appropriately.
If you have any questions about how we use your personal information or wish to exercise one of your data protection rights, please contact us using the contact details provided on our website.

3. The information we collect
Depending on the assessment and the information necessary to carry it out, we may collect and process the following information.

Information about the child or young person
This may include:

- Full name.
- Date of birth and/or age.
- School and year group.
- Educational history.
- Information about academic progress.
- Information relating to literacy, numeracy, learning and educational needs.
- Information provided in questionnaires.
- Information provided during assessment discussions.
- Assessment results and observations.
- Information necessary to prepare the assessment report.

Information about parents and carers
We may collect:

- Parent or carer's name.
- Contact details.
- Relationship to the child or young person.
- Information necessary to arrange and administer the assessment.
- Information provided by the parent or carer about the child or young person.

Information about schools and education professionals
We may collect:

- Teacher names.
- School names.

- Relevant information provided by teachers or other education professionals.
- Information concerning the child's educational progress and learning needs.

Health and medical information
Where relevant to the assessment, we may collect information about:

- Illnesses.
- Medical conditions.
- Other health information.
- Information concerning factors that may affect learning or educational development.

Health information is treated as special category personal data under the UK GDPR and is subject to additional safeguards.
We aim to collect only information that is relevant and necessary for the assessment.

Payment information
We may process information relating to payment for our services, including information necessary to identify and reconcile payments made by bank transfer and information necessary to process payments made over the telephone.
We do not retain payment card details unnecessarily.

4. How we collect information
We may collect information through:

- Assessment questionnaires.
- Information provided by parents or carers.
- Information provided directly by the child or young person where appropriate.
- Face-to-face discussions.
- Telephone conversations.
- Email correspondence.
- Information provided by teachers or schools.
- Our website and website enquiry forms.
- Information provided when arranging or paying for an assessment.

Telephone conversations used to gather assessment information are not recorded.

5. Why we use personal information
We use personal information to:

- Arrange and provide dyslexia assessments.
- Understand the individual's educational and learning needs.
- Carry out the assessment appropriately.
- Communicate with parents, carers and relevant individuals about the assessment.
- Communicate with schools or teachers where appropriate and necessary to carry out the assessment.
- Prepare assessment reports.
- Provide the completed assessment report to the person who booked and paid for the assessment.
- Process and administer payments.
- Maintain appropriate business and financial records.
- Respond to enquiries.
- Meet our legal and regulatory obligations.
- Protect the security of our systems, records and services.
- Deal with complaints or concerns.
- Establish, exercise or defend legal claims where necessary.

We do not use assessment information for unrelated purposes or for direct marketing.

6. Our lawful basis for processing personal information
The UK GDPR requires us to identify a lawful basis before processing personal information.
Depending on the particular processing activity, we may rely on one or more of the following lawful bases:

- Contract: where processing is necessary to provide the assessment service that has been requested and paid for.
- Legal obligation: where we are required to process or retain information to comply with a legal obligation.

- Legitimate interests: where processing is necessary for our legitimate business interests, provided that those interests are not overridden by the rights and interests of the individual.
- Consent: where we ask an individual to give consent for a particular processing activity.

We will only rely on consent where it is appropriate to do so and where consent meets the requirements of the UK GDPR.

7. Special category data

Special category data

Some information collected during a dyslexia assessment may constitute special category personal data, particularly information concerning the health of the child or young person.

Great Minds will identify both an Article 6 lawful basis and an Article 9 condition before processing such information.

For relevant health information collected as part of the assessment, Great Minds relies on:

Article 6(1)(b) — Contract, where processing is necessary to provide the requested assessment service; and

Article 9(2)(a) — Explicit consent, where explicit consent is relied upon as the condition for processing relevant health information.

Explicit consent will be obtained through a clear statement specifically referring to the processing of health information. Consent will be recorded and may be withdrawn, subject to the consequences of withdrawal where the information is necessary for the assessment.

Great Minds will only collect health information that is relevant and necessary for the assessment and will not use it for unrelated purposes.

8. Children's personal information

Our services involve the assessment of children and young people.
We recognise that children require particular protection when their personal information is processed. We will therefore take additional care to ensure that information provided about children is:

- Collected only where necessary.
- Used only for appropriate and clearly explained purposes.
- Kept accurate where reasonably possible.
- Stored securely.

- Accessible only to people who have a genuine need to access it.
- Retained only for as long as necessary.
- Not used for profiling, targeted advertising or unrelated marketing.

Where appropriate, information will be explained to children and young people in clear and understandable language, taking account of their age and level of understanding.
We recognise that children may have data protection rights in their own right. Requests relating to a child's personal information will be considered on an individual basis, taking account of the child's age, maturity and understanding and the circumstances of the request.
The ICO's current guidance specifically emphasises clear explanations, data minimisation, strict access controls and appropriate consideration of children's rights when processing children's personal information. IICO+1

9. Parents and carers
The person arranging and paying for an assessment will normally be a parent or carer. The completed assessment report will be sent only to the person who booked and paid for the assessment.
We will not send the assessment report directly to the child's school or teacher. The parent or carer is responsible for deciding whether and with whom they wish to share the completed report, unless there is another lawful basis requiring or permitting us to disclose information.
Where a school or teacher provides information as part of an assessment, this does not automatically mean that the school will receive the completed report.

10. Information provided by schools
Where an assessment is carried out within a school, or where relevant information is provided by a school or teacher, we will handle that information securely and only use it for legitimate assessment-related purposes.
Schools may have their own responsibilities as data controllers when providing information to us. Where necessary, we will clarify the respective responsibilities of Great Minds and the school.

11. Sharing personal information
We keep access to personal information as limited as possible.
Personal information may be accessed by:

- The qualified assessor carrying out the assessment.
- The other qualified assessor/founding director where discussion of a complex or unusual assessment profile is necessary for professional purposes.
- Appropriate administrative personnel, if required in the future and where access is necessary for their role.
- Service providers who process information on our behalf, where applicable and subject to appropriate contractual and security arrangements.

We do not sell personal information.
We do not routinely share assessment reports with schools, teachers or other third parties.
We may disclose information where we are legally required to do so, where necessary to protect someone's vital interests, or where disclosure is otherwise lawful and appropriate.

12. Professional discussion of assessments
Where an assessment profile is complex or requires further professional consideration, the assessor may discuss the assessment with the other qualified assessor/founding director within Great Minds.
Such discussions will be limited to what is necessary for professional assessment purposes.
Both assessors are bound by appropriate confidentiality and data protection responsibilities.

13. Storage of electronic information
Electronic personal information is stored using Microsoft 365 services, including OneDrive and SharePoint.
We use appropriate access controls and security measures to restrict access to authorised individuals.
Access to personal information is limited according to the person's role and genuine need to access the information.
We will take reasonable steps to ensure that electronic information is protected against:

- Unauthorised access.
- Accidental loss.
- Destruction.

- Unauthorised alteration.
- Unauthorised disclosure.

We will regularly review our security arrangements and access permissions.

Great Minds Dyslexia
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office@greatminds-dyslexia.co.uk

14. Paper records
Paper assessment records, including assessment papers, are stored securely in a locked filing cabinet.
Access is restricted to authorised personnel.
Paper records will not be left unattended where they could be accessed by unauthorised individuals.
When paper records reach the end of their retention period, they will be securely destroyed.

15. Assessment reports
Assessment reports contain confidential personal information.
Reports are sent electronically to the person who booked and paid for the assessment.
Reports are password protected.
We will take reasonable steps to ensure that reports are sent only to the intended recipient.
Where appropriate, the password should be communicated separately from the report itself.
Recipients are expected to take reasonable care of the report once it has been provided to them.

16. Website and online enquiries
Our website allows individuals to contact us by email/enquiry form.
Information submitted through our website will be used to respond to the enquiry and, where relevant, to arrange our services.
We will not use website enquiry information for unrelated marketing without an appropriate lawful basis.
Our website may use cookies or similar technologies. Where applicable, information about cookies and similar technologies will be provided in our Cookie Policy.

17. Marketing and social media
We do not currently send marketing emails or newsletters.
We maintain social media accounts and may publish information about our services, educational information and general awareness content.
We will take care not to publish personal information about children or assessment clients without an appropriate lawful basis and, where required, appropriate consent.

The fact that social media posts are shared by other users does not give us permission to disclose confidential client information.
We will never use identifiable assessment information or client case information for promotional purposes unless we have an appropriate lawful basis and any necessary consent.

18. Payment information
Payments for our services may be made by telephone or bank transfer.
We process payment information only to administer and reconcile payments and to maintain appropriate financial records.
Bank details and other payment information will be handled securely.
Where payment is processed through a third-party payment provider, that provider may process personal information in accordance with its own privacy information and contractual arrangements with us.

19. Data retention
We retain assessment records for six years.
This may include:

- Assessment questionnaires.
- Assessment notes.
- Relevant correspondence.
- Assessment papers.
- Information used to prepare the assessment.
- Copies of assessment reports.
- Relevant administrative records.

The six-year retention period is intended to support appropriate record keeping and the management of potential queries, complaints, professional issues or legal matters.
At the end of the retention period, information will be securely deleted or destroyed unless there is a lawful reason to retain it for longer.
Retention periods will be reviewed periodically and may be amended where legal, regulatory, professional or operational requirements change.
The ICO expects organisations processing special category information to document their retention and deletion arrangements. IICO+1

20. Accuracy of information

We take reasonable steps to ensure that personal information we hold is accurate and, where necessary, kept up to date.
If you believe that information we hold about you or the child/young person is inaccurate, please contact us so that we can consider and, where appropriate, correct the information.

21. Data security
We take the security of personal information seriously.
Our security measures include:

- Password-protected electronic systems.
- Access controls.
- Secure Microsoft 365, OneDrive and SharePoint storage.
- Restricted access to assessment information.
- Locked physical storage for paper records.
- Password protection for assessment reports.
- Confidentiality obligations for those accessing assessment information.
- Secure disposal of paper and electronic records.
- Regular review of access to personal information.

Because the information we process may include children's information and health information, we recognise the need for appropriate security measures proportionate to the sensitivity of the information.

22. Personal data breaches
A personal data breach may include the accidental or unlawful:

- Loss of personal information.
- Destruction of personal information.
- Alteration of personal information.
- Disclosure of personal information.
- Access to personal information by an unauthorised person.

Any suspected data breach must be reported to the Data Protection Leads as soon as possible.
We will assess the incident, take steps to contain and remedy it, document the incident and determine whether notification to the ICO and/or affected individuals is required.

Where the UK GDPR requires notification to the ICO, we will aim to make the notification within the applicable statutory timeframe.

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23. Individual data protection rights
Depending on the circumstances and applicable legal exemptions, individuals may have rights under the UK GDPR including:

- The right to be informed about how their personal information is used.
- The right to access personal information we hold about them.
- The right to have inaccurate personal information corrected.
- The right to request erasure of personal information in certain circumstances.
- The right to request restriction of processing in certain circumstances.
- The right to object to certain processing.
- The right to data portability in certain circumstances.
- Rights relating to automated decision-making and profiling, where applicable.

We do not currently use automated decision-making or profiling to determine dyslexia assessment outcomes.
Requests concerning children's personal information will be considered carefully, taking account of the child's rights and level of understanding.
The ICO confirms that a subject access request can be made by or on behalf of an individual and includes the right to obtain a copy of personal information held by an organisation. IICO

24. How to exercise your rights
To exercise a data protection right or ask a question about how we use personal information, please contact:

Great Minds Dyslexia Services CIC
Data Protection Leads: Amy Appleton and Laura Furniss
Email: office@greatminds-dyslexia.co.uk
Address:
Office Suite 8, McMillan House
6 Wolfreton Drive
Anlaby
East Yorkshire
HU10 7BY

We may need to verify the identity of a person making a request before releasing personal information.
We will deal with requests in accordance with the applicable legal requirements.

25. Complaints
If you have concerns about the way we have handled your personal information, please contact us in the first instance so that we can investigate and attempt to resolve your concern.
You also have the right to complain to the Information Commissioner's Office (ICO).
Information about making a complaint to the ICO is available from the ICO website.

26. Data processors and third-party services
Where we use another organisation to process personal information on our behalf, we will take appropriate steps to ensure that the organisation provides sufficient guarantees regarding the security and lawful processing of personal information.
We will have appropriate contractual arrangements in place where required.
Our use of Microsoft 365, OneDrive and SharePoint is subject to Microsoft's applicable contractual terms and data protection arrangements.

27. International transfers
Where personal information is transferred outside the UK, we will ensure that the transfer is made in accordance with applicable UK data protection law and that appropriate safeguards are in place where required.

28. Data protection by design and minimisation
We will seek to apply the principles of data protection by design and default.
In particular, we will:

- Collect only information that is relevant to the assessment or another lawful purpose.
- Avoid collecting unnecessary health information.
- Restrict access to information.
- Keep information only for as long as necessary.
- Review our processes and security arrangements.
- Consider data protection implications when introducing new technology or services.

29. Data Protection Impact Assessment

Because our core service involves processing information about children and may involve special category health information, Great Minds will consider and document the data protection risks associated with its processing activities.

Where processing is likely to result in a high risk to individuals' rights and freedoms, we will carry out a Data Protection Impact Assessment (DPIA) before commencing or significantly changing the relevant processing.

The ICO recommends considering DPIAs particularly carefully where processing involves sensitive information or vulnerable individuals, including children. IICO

30. Appropriate policy document

Where required by the UK GDPR and Data Protection Act 2018, Great Minds will maintain an appropriate policy document covering relevant special category processing.

The document will set out the relevant processing condition, how we comply with the data protection principles, and our retention and deletion arrangements.

31. Confidentiality

All individuals working for or on behalf of Great Minds who have access to personal information are expected to maintain confidentiality.

Personal information will only be accessed where there is a legitimate reason to do so.

32. Changes to this policy

We may update this policy from time to time to reflect changes in legislation, regulatory guidance, our services, technology or our data processing activities.

The most recent version will be made available through our website where appropriate.

33. Review

This policy will be reviewed at least annually and sooner if there are significant changes to:

- Data protection legislation.
- ICO guidance.
- Our services.
- The types of personal information we collect.
- The systems we use.
- The organisations with whom we share information.
- Our security arrangements.

Policy owner: Amy Appleton and Laura Furniss
Business: Great Minds Dyslexia Services CIC
Review frequency: At least annually