

Title	Information Rights Policy
Cross References	Internal: 🍑 Safeguarding and Child Protection Policy 🍑 Data Protection and Privacy Policy 🍑 Complaints Policy 🍑 Data Breach Policy 🍑 Staff Code of Conduct 🍑 Online Safety / Acceptable Use Policy 🍑 Record Keeping and Retention Policy (where applicable) 🍑 Data Protection and Privacy Policy
Date	October 2026

1. Purpose

Apricot Learning Online is committed to managing personal information lawfully, securely, transparently and respectfully. We recognise that young people, families, staff and partner agencies place trust in us and we take our responsibility to protect and manage personal information seriously.

This policy explains how individuals can exercise their information rights and how Apricot Learning Online will recognise, manage and respond to requests in accordance with applicable UK data protection law.

2. Principles

Our approach to information rights is guided by the following principles:

- Clarity – processes are explained in a straightforward and accessible way.
- Respect – individuals are supported to understand and exercise their information rights.
- Confidentiality – personal information is handled securely and only disclosed appropriately.
- Safeguarding – the welfare and safety of children and young people remain central to decision-making.
- Accountability – requests, decisions and relevant actions are appropriately recorded.

3. Information Rights

Depending on the circumstances and the lawful basis on which personal data is processed, individuals may have rights including:

- the right to be informed about how their personal data is used;
- the right of access to personal data held about them;
- the right to request rectification of inaccurate or incomplete personal data;
- the right to request erasure of personal data in certain circumstances;
- the right to request restriction of processing in certain circumstances;
- the right to object to processing in certain circumstances;
- the right to data portability where the statutory conditions apply; and
- rights relating to solely automated decision-making and profiling where applicable.

These rights are not absolute and do not all apply in every circumstance. Apricot Learning Online will consider each request in accordance with the applicable legal requirements, exemptions and restrictions.

4. Subject Access Requests

4.1 Making a Request

Individuals have the right to request access to their personal data. A subject access request (SAR) does not need to use particular wording or be made on a specific form. Requests may be made verbally or in writing.

A request may also be made by a person authorised to act on the individual's behalf. Where appropriate, Apricot Learning Online will take reasonable steps to confirm that authority.

Requests should be directed to:

Jodie Phillips, Operations Director – jodie@apricotlearningonline.co.uk

Staff who receive a request elsewhere must recognise that it may still be a valid information-rights request and must forward it promptly to the Operations Director or designated information-rights lead.

4.2 Identity and Authority

Before disclosing personal information, Apricot Learning Online must be satisfied about the identity of the requester and, where relevant, their authority to act for another person.

Any request for identification will be reasonable and proportionate. Formal identification will only be requested where necessary, and requests for identification or evidence of authority will be made promptly to avoid unnecessary delay.

4.3 Timescales

Apricot Learning Online will respond to a valid subject access request without undue delay and normally within one month, calculated in accordance with applicable data protection law.

Where Apricot Learning Online reasonably requires information to confirm the requester's identity or a representative's authority, the response period will be calculated from receipt of the required information in accordance with the applicable rules.

Where a request is complex, or an individual has made a number of requests, the response period may be extended by up to a further two months where the legal conditions are met. The individual will be informed of the extension and the reason for it within the required timeframe.

Where clarification of the information requested is reasonably required, Apricot Learning Online will manage the request and any effect on the response period in accordance with the applicable data protection rules.

4.4 Searching for and Providing Information

Apricot Learning Online will make reasonable and proportionate searches for personal information falling within the scope of a valid request.

Information will normally be provided electronically where appropriate, unless another suitable format is requested or required. Information will be provided securely and in a form that is clear and accessible to the individual.

4.5 Fees

Apricot Learning Online will not normally charge a fee for responding to a subject access request.

A reasonable fee may be charged where permitted by law, including where a request is manifestly unfounded or excessive or where an individual requests further copies of information already provided. Any fee will reflect reasonable administrative costs and the requester will be informed of the reason for the fee.

5. Children and Young People's Information

Children and young people have information rights in their own right. Where a request relates to a child or young person, Apricot Learning Online will consider the individual's age, maturity, understanding and ability to exercise their own rights.

A parent or carer does not automatically have an unrestricted right to access all personal data relating to a child or young person. Where a parent, carer or other representative makes a request, Apricot Learning Online will consider the young person's understanding, any authority or consent provided, parental responsibility where relevant, safeguarding considerations and the circumstances of the request.

Where appropriate, the views and best interests of the child or young person will be considered alongside legal obligations and safeguarding responsibilities.

6. Third-Party Information, Safeguarding and Exemptions

Information requested under a SAR may include information relating to another person, safeguarding information or material to which a legal exemption or restriction may apply.

Apricot Learning Online will review information carefully before disclosure. Information may be withheld, redacted or otherwise handled differently where required or permitted by law, including where disclosure would reveal information about another person and it would not be reasonable to disclose it.

Safeguarding considerations do not remove an individual's information rights, but they may affect how particular information is handled or disclosed. Where appropriate, Apricot Learning Online will consider risks to the child or another person and may seek relevant safeguarding or legal advice.

Where information is withheld or a request is refused wholly or partly, Apricot Learning Online will provide the requester with the information required by law about the decision, including relevant complaint rights.

7. Rectification

Apricot Learning Online takes reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date.

Individuals may request correction of inaccurate personal data or completion of incomplete data. Requests will be considered and responded to within the applicable statutory timeframe. Where appropriate, processing may be restricted while accuracy is considered.

8. Erasure, Restriction, Objection and Portability

Requests for erasure, restriction of processing, objection to processing or data portability will be considered on their individual facts and in accordance with the conditions that apply to the relevant right.

For example, Apricot Learning Online may need to retain information despite an erasure request where there is a lawful reason or legal obligation to retain it, including appropriate safeguarding, legal claims or record-keeping requirements.

Where a right does not apply, or an exemption or restriction is relied upon, the individual will be informed as required by law.

9. Manifestly Unfounded or Excessive Requests

There is a high threshold for treating a request as manifestly unfounded or excessive. Apricot Learning Online will consider each request individually and will not apply a blanket approach.

Where the legal threshold is met, Apricot Learning Online may, as permitted by law, charge a reasonable fee or refuse to act on the request. Any such decision will be documented and the requester will be informed of the reasons and relevant complaint rights.

10. Concerns and Complaints

If an individual is unhappy with how their personal information or information-rights request has been handled, we encourage them to raise the matter with Apricot Learning Online so that it can be reviewed and, where possible, resolved promptly.

Concerns will be considered fairly and in accordance with the relevant Apricot Learning Online procedure. Individuals also have the right to raise concerns with the Information Commissioner's Office (ICO) and, where applicable, to seek a judicial remedy.

11. Roles and Responsibilities

Operations Director / Designated Information-Rights Lead

The Operations Director or designated lead is responsible for:

- coordinating information-rights requests;
- ensuring requests are identified, recorded and responded to appropriately;
- seeking advice where exemptions, safeguarding issues or complex legal questions arise;
- supporting staff and maintaining appropriate procedures and records; and
- monitoring compliance with applicable data protection requirements.

All Staff

- All staff are responsible for:
- handling personal information securely;
- recognising verbal and written requests that may engage information rights;
- forwarding requests promptly to the appropriate lead;
- co-operating with reasonable searches for information; and
- reporting actual or suspected personal data breaches immediately in accordance with the Data Breach Policy.

12. Training and Awareness

Staff will receive appropriate information, guidance and training relevant to their roles so that information is handled securely, requests are recognised and escalated appropriately, and safeguarding and confidentiality requirements are consistently applied.

13. Record Keeping

Apricot Learning Online will maintain appropriate records of information-rights requests, relevant correspondence, searches, decisions, disclosures, exemptions or restrictions relied upon and the date the request was completed.

Records will be retained in accordance with Apricot Learning Online's records-management and retention arrangements.

14. Review and Monitoring

This policy will be reviewed annually and sooner where changes to legislation, regulatory guidance, organisational practice or identified risks make this necessary.

Authorised by: Jodie Phillips, Operations Director

Date: October 2026

Review Date: October 2027