Educational Document Redaction and Cognitive Profiling Process

Divergent Learning Community CIC

Policy Version 3.0 | Updated: 18 November 2026 | Review by: 18 November 2027

1. Policy Overview

This policy establishes the framework for processing educational documents containing personal information to create cognitive strengths profiles for learners aged **7-16**. It ensures compliance with UK GDPR, Data Protection Act 2018, Equality Act 2010, Children Act 2004, and integrates safeguarding throughout all processes.

Scope: Receipt, redaction, AI-assisted analysis, profile creation, and secure destruction of educational documents.

Purpose: Enable comprehensive cognitive profiling whilst protecting children's privacy and maintaining legal compliance.

2. Legal and Regulatory Framework

This policy operates under:

- UK GDPR and Data Protection Act 2018 – lawful processing of children's data
- Equality Act 2010 – reasonable adjustments for learners
- Children Act 2004 – safeguarding and child welfare duties
- Education Act 1996 – educational provision
- Working Together to Safeguard Children 2023

Lawful Basis: Article 6(1)(a) consent and Article 9(2)(a) explicit consent for special category data.

3. Roles and Responsibilities

Data Protection Lead:

- Policy oversight and regulatory compliance

- DPIA approval and ICO liaison
- Breach response coordination

Designated Safeguarding Lead (DSL):

- Safeguarding concern identification and escalation
- Multi-agency referrals when required
- Maintain safeguarding records separately from educational profiles

Profiling Analyst:

- Document redaction and AI analysis
- Profile creation using DLC cognitive framework
- Secure document destruction verification

4. Understanding DLC's Capacity

What DLC Can Support

- Children with diverse cognitive profiles
- Different MIND reasoning types and processing speeds
- Individualised, strengths-based learning approaches
- Small group collaborative work

What DLC Cannot Provide

As a small learning community, DLC **cannot** provide:

- Intensive 1:1 specialised behavioural intervention
- Clinical therapeutic or mental health support
- Specialised autism programmes (ABA, intensive sensory programmes)
- Medical management or crisis intervention beyond basic first aid
- Full-time care for severe anxiety, self-regulation challenges, or complex trauma

Capacity Assessment During Profiling

When processing educational documents, the Profiling Analyst will assess whether the child's profile suggests support needs beyond DLC's capacity. If identified:

- Parents will be contacted to discuss concerns
- Alternative provisions may be recommended
- Placement may not be offered if needs exceed DLC's capacity

This is about being honest that DLC works best when a child's support needs align with our current capacity and expertise.

5. Parental Consent Requirements

Processing children's educational documents requires explicit, informed, freely-given consent from parents/carers with parental responsibility.

Consent Form Must Include:

- Clear description of documents being processed
- Explanation of redaction and AI analysis process
- How information will be used to create cognitive profile
- Information about DLC's capacity and limitations
- Data retention periods and secure destruction procedures
- Right to withdraw consent at any time
- DLC contact details for questions or concerns

Withdrawal: Parents may withdraw consent at any stage. Upon withdrawal, all documents and profiles must be securely destroyed within 72 hours and parents notified of completion.

6. Document Intake and Classification

Step 1: Document Receipt

- Verify signed parental consent before accepting documents
- Log date received, document type, child identifier
- Store in password-protected encrypted folder immediately

Step 2: Safeguarding Initial Screen

- Review for immediate safeguarding concerns (abuse indicators, urgent medical needs)
- Flag to DSL if concerns identified – separate from educational profiling process

Step 3: Document Classification

Classify by data sensitivity:

- **Standard:** General educational assessments, observations
- **Enhanced:** Reports from professionals, therapy assessments, medical documentation
- **Safeguarding-Flagged:** Documents containing child protection concerns

7. Redaction Process

DLC uses a text-based manual redaction method. Only the relevant sections of a document are copied into a fresh document, all personal identifiers are removed using the checklist below, and a second check (by a second trained community member where available, otherwise a separate, unhurried read-through on a different day) is completed before any text is used. Black-box redaction on top of PDFs is not used, because it can be reversible. Scanned or handwritten reports are retyped, leaving out identifying details.

Information to Redact:

- Names: Child, family members, teachers, professionals
- Addresses, postcodes, phone numbers, email addresses
- School names, NHS numbers, unique identifiers
- Birth dates and exact ages (an age band, e.g. 7–9, may be kept where educationally relevant)
- Photographs and other identifying images

Information to Retain:

- Educational assessments, test results, observations
- Cognitive strengths, interests, processing patterns
- Therapy reports (redacted of personal details)
- Age band (educational context)

Quality Assurance:

- Search the redacted text for names, dates, places and numbers to confirm all personal data has been removed
- Manual secondary review by profiling analyst
- Document redaction completion in processing log

8. AI-Assisted Analysis

Redacted documents are processed through Claude AI (Anthropic) to identify cognitive strengths patterns aligned with DLC's cognitive profiling approach.

Analysis Parameters:

- AI receives only redacted documents – no personal identifiers
- Analysis focuses on cognitive patterns, learning strengths, processing preferences
- Output reviewed by profiling analyst before inclusion in child profile

AI Provider Safeguards:

- Model training ("Help improve our AI models") is switched off on DLC's Claude account
- Analysis takes place in incognito chats, which are not saved to the chat history; feedback buttons are never used
- Only redacted text is ever entered

9. Profile Creation

The profiling analyst synthesises AI analysis outputs into a comprehensive cognitive strengths profile using DLC's educational framework.

Profile Components:

- Cognitive strengths, described using the MIND strengths framework (Material, Interconnected, Narrative, Dynamic)
- Interests, engagement and helpful environmental conditions
- Recommended educational strategies and accommodations
- Areas for development (framed positively)
- Assessment of whether DLC can appropriately support the child

Storage: Profiles stored in encrypted, password-protected systems with access limited to authorised community members.

Retention: Profiles retained for the duration of the child's time at DLC plus 2 years, then securely destroyed.

10. Safeguarding Integration

Throughout the profiling process, community members must remain vigilant for safeguarding concerns.

Immediate Escalation Required For:

- Suspected physical, emotional, or sexual abuse
- Neglect or inadequate parental care
- Domestic violence or substance abuse indicators
- Self-harm, suicidal ideation, or mental health crisis
- Child sexual exploitation or radicalisation concerns

Escalation Process:

- Immediately notify DSL (do not delay)
- DSL assesses risk and determines appropriate action
- If required, DSL contacts MASH, police, or emergency services
- Safeguarding records maintained separately from educational profiles

CRITICAL: Educational profiling pauses until safeguarding concerns resolved. Child safety always takes precedence over administrative processes.

11. Secure Destruction

All original and redacted documents must be securely destroyed after profile creation.

Timeline:

- **Standard destruction:** Within 30 days of profile completion
- **Consent withdrawal:** Within 72 hours of request

Destruction Method:

- **Digital files:** Permanent deletion with overwrite (minimum 3 passes)
- **Physical documents:** Cross-cut shredding or certified destruction service
- **Verification:** Log destruction date, method, and approving community member

12. Data Breach Response

A data breach is any unauthorised access, disclosure, loss, or alteration of personal data.

Immediate Actions (within 24 hours):

- Contain breach and secure affected systems
- Notify the Data Protection Lead immediately
- Document what happened, when, and what data was affected

Data Protection Lead assessment (within 72 hours):

- Evaluate risk to affected children
- Determine if ICO notification required (high risk breaches)
- Notify affected parents without undue delay
- Implement remedial actions and prevent recurrence

13. Individual Rights Under UK GDPR

Parents and children (with appropriate age/capacity) have the following rights:

- **Right of access:** Request copies of all personal data held
- **Right to rectification:** Correct inaccurate information
- **Right to erasure:** Request deletion of data
- **Right to restrict processing:** Limit how data is used
- **Right to data portability:** Receive data in portable format
- **Right to object:** Challenge processing activities

Response Timeline: DLC responds to rights requests within one month. Complex requests may be extended by up to two further months, with an explanation.

14. Community Member Training Requirements

All community members involved in document processing must complete:

- UK GDPR and Data Protection Act 2018 fundamentals
- Children's data protection enhanced requirements
- Safeguarding awareness (minimum Level 1, DSL holds Level 3)
- The DLC redaction method and quality checks
- DLC profiling framework and analysis methodology

Refresher Training: Annually for GDPR and safeguarding; method updates as needed.

15. Record Keeping

DLC maintains comprehensive processing logs:

- Consent forms (signed and dated)
- Document intake logs (date, type, classification)
- Redaction completion verification
- AI analysis dates and outputs
- Profile creation and approval dates
- Destruction certificates
- Rights requests and responses
- Breach incidents and remediation

Retention: Processing logs retained for 6 years post-child departure, then securely destroyed.

16. Policy Review

This policy will be reviewed:

- Annually as standard practice
- Following any data breach or safeguarding incident
- When legislation or regulatory guidance changes
- Following ICO feedback or audit recommendations

Approval: Policy updates are reviewed by the Data Protection Lead and approved by the Founder.

QUICK REFERENCE: Document Processing Workflow

STEP 1: Intake

☐ Verify signed parental consent

☐ Log document receipt

☐ Store in encrypted folder

☐ Initial safeguarding screen

STEP 2: Classification

☐ Assess data sensitivity level

☐ Flag any safeguarding concerns to DSL

STEP 3: Redaction

☐ Remove all personal identifiers using the redaction checklist

☐ Quality check – verify complete redaction

☐ Log redaction completion

STEP 4: AI Analysis

☐ Process redacted text through Claude AI (incognito chat, model training off)

☐ Extract cognitive strengths patterns

☐ Analyst reviews AI outputs

STEP 5: Profile Creation

☐ Synthesise analysis into DLC cognitive profile

☐ Assess if DLC can appropriately support child

☐ Store profile securely

☐ Share with parents as agreed

STEP 6: Destruction

☐ Securely destroy original documents (within 30 days)

☐ Securely destroy redacted documents

☐ Log destruction completion

☐ Retain profile only

Contact Information

Data Protection Lead

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Designated Safeguarding Lead

Claudia Celi

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Information Commissioner's Office

Website: ico.org.uk

Helpline: 0303 123 1113

Local Authority Designated Officer (LADO)

Hillingdon LADO (London Borough of Hillingdon)
Referrals via the online LADO contact form: hillingdon.gov.uk/LADO-Contact

Appendix A: Required Forms and Templates

The following forms and templates support this policy:

1. **Parental Consent Form**

- Explicit consent for document processing and AI analysis

- Clear withdrawal procedures
- Parent/carer signature and date

2. **Document Intake Log**

- Date received, document type, child identifier
- Classification level, safeguarding flags

3. **Redaction Completion Certificate**

- Verification of complete personal data removal
- Analyst signature and date

4. **Destruction Certificate**

- Method used, date completed, approving community member

5. **Rights Request Response Template**

- Standard responses to access, erasure, rectification requests

6. **Data Breach Report Form**

- Incident details, affected data, containment actions, notifications sent

Contact & Legal Information

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