



DATA PROTECTION POLICY

1. Purpose of This Policy

This policy explains how I collect, store, use, and protect personal information when providing coaching and mentoring services to children and young people. It ensures compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

I am committed to safeguarding children's privacy and ensuring that their personal information, and that of their families, is handled lawfully, fairly, and transparently.

2. Lawful Basis for Processing

Personal data is collected and processed only where there is a clear lawful basis. These include:

- **Consent** – freely given by the parent/carer (and, where appropriate, the child).
- **Contract** – where data is necessary to deliver mentoring and coaching services.
- **Legal obligation** – to meet safeguarding duties or statutory reporting requirements.
- **Legitimate interests** – where processing is necessary for service delivery and does not override the rights of the child.
- **Vital interests** – where information must be shared to protect a child's life or prevent serious harm.

3. Types of Information Collected

I may collect and store the following information:

- Child's personal details: name, age, school, and contact information.
- Parent/carer details: names, addresses, phone numbers, email addresses.
- Background information: relevant educational, social and health needs shared to support mentoring.
- Records of sessions, goals, and progress.
- Safeguarding or wellbeing concerns where relevant.

I will only request information that is necessary to deliver safe, effective, and personalised mentoring.

4. How Data Is Collected

Data may be collected directly from:

- The child or young person (where appropriate).
- Parents/carers.
- Schools or local authorities commissioning services.

5. How Data Is Stored and Protected

- Personal data is stored securely, either in password-protected digital files or locked physical storage.
- Access to information is restricted to myself and, where required, relevant professionals with a safeguarding or legal duty.
- Data is not shared with third parties without consent, unless required for safeguarding or legal compliance.

6. Sharing of Information

Information may be shared with:

- Parents/carers.
- Schools or local authorities (where commissioned).
- Safeguarding agencies, if a child is at risk of harm.

Data will never be sold or used for marketing purposes without explicit consent.

7. Retention of Information

- Personal information will be kept only as long as necessary to fulfil the purpose it was collected for.
- Session notes will normally be retained for **7 years** in line with professional standards and insurance requirements.
- After this period, information will be securely deleted or destroyed.

8. Children's Rights

Children and families have the right to:

- Access their personal data.
- Request correction of inaccurate data.
- Request deletion of data (where lawful).
- Restrict or object to certain processing.
- Withdraw consent at any time (where consent is the basis for processing).

Requests will be responded to within **one month**.

9. Safeguarding and Data Protection

Where safeguarding concerns arise, I am legally required to share information with relevant agencies. This will always be done in line with statutory guidance, including *Working Together to Safeguard Children (2023)* and *Keeping Children Safe in Education (2025)*.

10. Data Breach Procedures

If a data breach occurs (loss, unauthorised access, or misuse of personal data):

- I will take immediate steps to contain and assess the breach.
- If there is a risk to individuals' rights, I will notify the Information Commissioner's Office (ICO) within **72 hours**.
- Affected individuals will be informed without undue delay.

11. Contact and Complaints

If you have questions about this policy or wish to exercise your data rights, please contact:

CORINNE MARTINEZ
Data Controller – ACUMIST EDUCATION LIMITED
c.martinez@acumist.education

If you are unhappy with how your data is handled, you have the right to complain to the **Information Commissioner's Office (ICO)**: www.ico.org.uk

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