



GDPR Compliance Pack

Registered company no. 12760014
ICO Registration Number: ZB615860
Reviewed: August 2025

Data Protection Policy

Flourish Oxford Ltd is committed to ensuring the lawful, fair, and transparent processing of personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Scope

This policy applies to all personal data processed by Flourish Oxford Ltd for the purposes of providing training, therapeutic services, and related activities. It applies to the Director and any self-employed associates engaged to support service delivery.

Commitments

We are committed to:

- Processing data lawfully, fairly, and transparently.
- Collecting only necessary information and keeping it accurate and up to date.
- Storing data securely using Heidi (GDPR-compliant practice management software) and Microsoft 365.
- Restricting access to authorised individuals only.
- Respecting the rights of data subjects at all times.

Roles & Responsibilities

Data Controller: Flourish Oxford Ltd

Primary Processor: Heidi (practice management system)

Additional Tools: Microsoft 365 for secure document management

Associates are required to sign confidentiality and data handling agreements.



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www.flourishoxford.com



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Records Retention Policy

Flourish Oxford Ltd retains personal data only as long as necessary to meet legal, professional, and contractual obligations. Data is securely deleted or shredded after the retention period.

Data Type	Retention Period	Rationale
Session notes & records	7 years from last session	Professional indemnity requirements
Training evaluations & feedback	2 years	Service monitoring & quality improvement
School reports & consultation notes	3 years	For ongoing educational support
Financial & invoicing records	7 years	HMRC legal requirement
Safeguarding records	Until the child reaches 25	Statutory safeguarding guidance

Security Incident Process

This process sets out how Flourish Oxford Ltd identifies, responds to, and reports data breaches to protect the rights and freedoms of data subjects.

Examples of Data Breaches

- Loss or theft of personal data
- Unauthorised access to personal records
- Accidental deletion or corruption of records
- Sending personal data to the wrong recipient

Incident Response Process

1. Identify the breach immediately.
2. Contain the breach and secure affected systems.
3. Assess the nature and extent of the breach.
4. Report to the ICO within 72 hours if there is risk to individuals.
5. Notify affected individuals if there is a high risk of harm.
6. Document the incident and lessons learned.



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Privacy Notices

Flourish Oxford Ltd takes your privacy seriously. This notice explains how we collect, store, and protect your data in line with UK GDPR and the Data Protection Act 2018.

Who We Are

Flourish Oxford Ltd

Company No: 12760014

ICO Registration Number: ZB615860

Contact: 07866 502 178

What We Collect

- Contact details (name, email, phone, address)
- Background information (e.g., referral notes, reports)
- Session records and progress notes
- Feedback and evaluation forms
- Payment and invoicing information

Why We Process Your Data

We process your data to:

- Deliver training and therapeutic services (Contract)
- Monitor progress and evaluate outcomes (Legitimate Interests)
- Share reports with professionals when agreed (Consent)
- Comply with legal and safeguarding obligations (Legal Obligation)

Storage and Security

- All records are stored using Heidi, a GDPR-compliant secure platform.
- Microsoft 365 is used for secure document storage.
- Devices are encrypted and password-protected.
- Access is restricted to authorised personnel only.

Your Rights

You have the right to:

- Access, rectify, or delete your data
- Withdraw consent at any time
- Request data portability
- Complain to the ICO if you believe your data is mishandled



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Paper Records Storage & Management

This section outlines how Flourish Oxford Ltd securely stores, manages, and disposes of physical client records, ensuring compliance with UK GDPR and professional standards.

Storage

- All paper client records are stored in a locked filing cabinet within a locked office.
- Access is strictly limited to authorized personnel (currently the Director).

Access and Key Management

- All paper client records are stored in a locked filing cabinet within a locked office.
- Access is strictly limited to authorized personnel (currently the Director).

Transport and Use

- Paper records do not leave the office unless absolutely necessary.
- When records must be transported (e.g., for home visits or supervision), they are securely sealed and personally carried.
- Records are returned to secure storage immediately after use.

Retention and Disposal

- Records are maintained according to the record retention schedule in line with professional, legal, and contractual obligations.
- When records are no longer required, they are securely destroyed using a cross-cut shredder or professional confidential waste service.

Emergency Planning

- Contingency planning considers emergencies such as fire, flood, or theft.
- Essential contact or safeguarding information may be stored digitally in a secure, encrypted, password-protected format to support continuity of service.

Review and Compliance

- This practice is reviewed annually to ensure ongoing compliance with GDPR, BACP standards, and safeguarding requirements.
- Any instance where records leave the office is documented, including purpose, date, and duration.