



Nurturing Progress Ltd – Privacy Policy
Updated August 2026

1. Purpose of this Privacy Policy

Nurturing Progress Ltd is committed to protecting your privacy and handling your personal information safely, respectfully and lawfully. This policy explains:

- what personal data we collect
- how we collect it
- how we use it
- our lawful bases for processing
- how long we keep information
- who we share it with
- your rights under UK GDPR
- how we keep your data secure
- how to make a complaint

This policy applies to all professional work carried out with children, young people, parents/carers and educational settings.

2. Who We Are

Data Controller: Nurturing Progress Ltd (Company No. 14642197) ICO Registration Number: ZB509520

Registered in England and Wales.

Data Protection Officer (DPO): Rachel Lander Email: rachel@nurturingprogress.co.uk Telephone: 07721 406507

You may contact us at any time with questions, concerns or requests relating to your personal data.

3. Data Minimisation

We only collect information that is necessary for the purpose of our work. We do not collect more data than we need, and we do not keep it for longer than required.

4. What Personal Data We Collect

The information we collect varies depending on the nature of our involvement. It may include:

- Basic information
- name, address, email, telephone number
- date of birth
- school/setting details
- parental responsibility information
- Special category data (UK GDPR Article 9)
- physical or mental health information
- wellbeing, emotional or behavioural information
- ethnicity, language
- safeguarding concerns
- criminal offence information (where relevant)
- Educational information
- attainment and progress data
- attendance, exclusion information
- SEN support plans, EHCPs
- reports from other professionals
- assessment results, questionnaires, observations
- Media and records
- images, audio or video recordings (where relevant)
- digital and paper records relating to our work
- Financial information
- bank account details for invoicing and payment

You must ensure the information you provide is accurate. If information is incomplete or incorrect, we may be unable to carry out the agreed work.

5. How We Collect Personal Data

We may collect information through:

- website contact form
- telephone or email
- consent for involvement forms
- questionnaires and assessments
- discussions with you, your child or young person
- discussions with school staff and other professionals
- information from schools and other professionals
- professional reports
- observation and direct work

6. Lawful Bases for Processing

Under UK GDPR, we rely on the following lawful bases:

For initial enquiries

Legitimate interests – responding to your request for support.

For professional involvement

Explicit consent – when you agree to our involvement.

Provision of health or social care (DPA 2018, Schedule 1 Part 1) – when processing wellbeing or mental-health information.

Substantial public interest – safeguarding (DPA 2018, Schedule 1 Part 2) – when sharing information to protect a child or young person.

Vital interests – where someone may be at immediate risk.

We only collect information relevant to the purpose of our work and associated reporting.

7. How We Store and Protect Your Data

We take appropriate technical and organisational measures to keep your data secure, including:

- paper records stored in locked filing systems
- electronic records stored on encrypted, password-protected devices
- secure cloud storage and email systems
- encrypted sharing of reports
- secure backup on external encrypted drives
- restricted access to records

8. Third-Party Processors

We use trusted third-party services to help us store and process data securely, such as:

- secure email providers
- cloud storage services
- website hosting services
- Digital Assessment platforms to administer and score standardised assessments.

These systems meet recognised security standards and store data within the UK or EEA. These organisations are required to keep your data safe and act only on our instructions.

9. International Transfers

We do not transfer your personal data outside the UK. If this ever becomes necessary, we will only do so where appropriate safeguards are in place in accordance with UK GDPR.

10. How Long We Keep Your Data

We keep personal data only for as long as necessary.

- Enquiry data (no consent form signed)- Kept for 12 months, after which it is securely deleted. You may request deletion sooner.
- Children and young people (under 18)- Records are kept until the young person reaches 25 years of age, in line with professional and safeguarding standards.
- Adults (18+)- Records are kept for 8 years following the end of involvement.

All data is securely deleted in the relevant year.

11. Sharing Your Information

We treat all personal data as confidential. We may share information with:

- school staff
- other professionals involved in supporting the child/young person
- health or social care professionals

- safeguarding agencies
- emergency services

We only share information when:

- you give explicit consent
- it is necessary for professional involvement
- it is required for safeguarding
- we are legally obliged to do so
- Reports and records are shared securely by encrypted email. Where work is commissioned by a school, they will receive a copy of the report. Where the work is commissioned by the parent, a copy will only be sent to the parent.

If you prefer certain information not to be shared, please discuss this with us.

12. Children's Rights and Gillick Competence

Young people aged 12–16 may have the right to refuse parental access to their information if they are deemed Gillick competent. Access may also be restricted if disclosure would place the young person or others at risk of harm.

14. Your Data Protection Rights

Under UK GDPR, you have the right to:

- access your personal data (Subject Access Request)
- request correction of inaccurate data
- request deletion of your data (right to be forgotten)
- request restriction of processing
- object to processing
- request data portability
- withdraw consent at any time
- be informed about automated decision-making (we do not use this)

We will respond to requests within one month, or up to three months for complex cases.

Requests should be made in writing to: rachel@nurturingprogress.co.uk

15. Data Breaches

If a data breach occurs:

- we will assess the risk
- we will notify the ICO within 72 hours where legally required
- we will inform affected individuals where there is a high risk to rights or freedoms
- we will take steps to prevent recurrence

16. How to Make a Complaint

If you are worried about how we are using your personal information, or if you feel something is not right, please contact us so we can look into it.

Data Protection Officer: Rachel Lander Email: rachel@nurturingprogress.co.uk Telephone: 07721 406507

We will acknowledge your complaint within 30 days, investigate it, and respond to you.

If you are not satisfied with our response, you can contact the Information Commissioner's Office (ICO):

Information Commissioner's Office (ICO) Website: www.ico.org.uk Telephone: 0303 123 1113

You do not need to contact us first, but we would appreciate the chance to resolve your concern.

17. Updates to This Policy

We may update this policy occasionally. The latest version will always be available on request.

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