



Woodland Pathways

GDPR, Data Protection & Privacy Policy

Date created or revised: 0925

Date of next review: 0926

1. Policy Statement

Woodland Pathways is committed to protecting the privacy and personal data of all individuals we work with, including learners, families, staff, commissioning bodies, and partner agencies.

We operate in full compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Guidance from the Information Commissioner's Office (ICO)

All personal data is handled lawfully, fairly, transparently, and securely, reflecting our duty of care to children, young people, and vulnerable individuals.

2. Scope

This policy applies to:

- All staff, volunteers, contractors, and practitioners
- All learners, parents/carers, and commissioning bodies
- All formats of personal data (paper, digital, photographic, and verbal)

3. Roles and Responsibilities

Directors (Data Controllers)

The Directors of Woodland Pathways act as Data Controllers and are responsible for:

- Ensuring compliance with GDPR and data protection legislation
- Overseeing implementation of this policy
- Managing data breaches and subject access requests
- Acting as the primary contact for data protection matters
- Conducting periodic data protection audits

A designated Data Protection Lead supports day-to-day compliance.

All Staff

All staff must:

- Handle personal data in accordance with this policy
- Maintain confidentiality at all times
- Store and transport data securely
- Report any concerns or breaches immediately
- Ensure personal data is not shared with unauthorised parties
- Avoid leaving devices or records unattended or unsecured
- Seek guidance where unsure about lawful data use

4. Data Protection Principles

Woodland Pathways adheres to the GDPR principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

5. Lawful Basis for Processing

We process personal data under the following lawful bases:

- Consent
- Legal obligation
- Vital interests
- Public task
- Legitimate interests
- Contractual necessity

Special category data (including health, safeguarding, and SEN information) is processed in accordance with additional legal protections.

6. Types of Data Collected

We may collect and process:

- Personal identification details
- Educational and EHCP information
- Behavioural, SEMH, and progress data
- Medical and health information
- Safeguarding records
- Staff and employment data

All data is collected only where necessary to support learning, safeguarding, and operational delivery.

7. DBS and Safeguarding Information

All staff and volunteers are subject to Enhanced DBS checks.

- This is a condition of employment
- Data relating to DBS checks and identity verification is securely stored
- Information is used solely to ensure the safety and suitability of staff

Safeguarding data is treated as highly sensitive and shared only on a need-to-know basis.

8. Medical Information

We may collect medical information such as:

- Allergies
- Medical conditions (e.g. asthma, diabetes)

This information is used solely to:

Protect the health, safety, and wellbeing of the individual

9. Data Security

We implement robust security measures:

- Locked storage for paper records
- Password-protected systems
- Restricted access (need-to-know basis)
- Secure transfer of data
- Encryption where appropriate
- Regular system backups

Staff must not leave sensitive data unattended.

10. Email and Communication Safety

Staff must:

- Avoid including personal data in email subject lines
- Use BCC where appropriate
- Ensure recipient details are correct before sending
- Avoid sharing sensitive information unless necessary

Misuse of email may constitute a data breach.

11. Sharing Personal Data

Data may be shared where necessary:

- With schools and commissioning bodies
- With Local Authorities (including Norfolk & Suffolk)
- With safeguarding agencies or emergency services
- With approved third-party providers

We ensure:

- Data sharing is lawful and proportionate
- Data sharing agreements are in place
- Third parties meet GDPR standards

12. Data Retention and Disposal

We follow statutory guidance:

- Data is retained only as long as necessary
- Records are reviewed regularly
- Paper records are shredded
- Digital data is securely deleted

13. Subject Access Requests (SARs)

Individuals have the right to access their personal data.

Requests must:

- Be made in writing (email or letter)
- Include sufficient identification

Woodland Pathways will:

- Respond within 1 month
- Provide information free of charge (unless excessive)

We may refuse requests where legally permitted.

14. Parental Access to Educational Records

Parents/carers have the right to access a learner's educational record within:

- 15 working days

Requests must be submitted in writing.

15. Data Subject Rights

Individuals have the right to:

- Access their data
- Rectify inaccurate data
- Request erasure
- Restrict processing

- Object to processing
- Withdraw consent
- Request data portability

16. Photography and Video

We may use images for:

- Educational records
- Reports
- Promotional materials (with consent)

We ensure:

- Written consent is obtained
- Images are not identifiable without permission
- Consent can be withdrawn at any time

17. Data Protection by Design

Woodland Pathways embeds data protection into all processes:

- Only necessary data is collected
- Privacy is considered in all new activities
- Staff receive ongoing training

18. Data Breaches

In the event of a breach:

- It must be reported immediately
- A full investigation is carried out
- The breach is recorded in a log
- The ICO is notified where required
- Affected individuals are informed if necessary

Procedures are reviewed following any breach.

19. Monitoring and Review

This policy is:

- Reviewed annually
- Audited periodically
- Updated following legislative changes

20. Contact Details

Woodland Pathways

Company Number: 17132521

 office@woodlandpathways.uk

ICO Reference: **ZC116317**

For further information or complaints:

Information Commissioner's Office (ICO)

www.ico.org.uk