



Data Protection Policy

1. Scope

This policy applies to all personal data collected, used, stored or shared by Meadow Learning CIC, trading as The Meadow. That includes information about young people, their families, staff, volunteers and directors, and information we receive from schools and the local authority when they commission a place for a young person. It applies to everyone who works or volunteers for The Meadow.

It should be read with our Privacy Notice, Information Security and Acceptable Use Policy, Data Retention and Records Management Policy, Personal Data Breach Procedure and Subject Access Request Procedure.

2. Responsibilities

- **The directors** of Meadow Learning CIC are accountable for compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- **Claire Imhasly (Manager and Director) is our Data Protection Lead.** She is the first point of contact for data protection questions, requests from individuals and data breaches. As a small organisation we are not required to appoint a Data Protection Officer.
- **Staff and volunteers** follow this policy, complete data protection training every year, and report any concern or breach to the Data Protection Lead straight away.

3. Data protection principles

We make sure that personal data is:

- used lawfully, fairly and in a transparent way
- collected for specified, explicit and legitimate purposes and not used in ways that are incompatible with them
- adequate, relevant and limited to what we need
- accurate and kept up to date
- kept no longer than necessary, as set out in our Data Retention and Records Management Policy
- kept secure, protected against unauthorised use, accidental loss, destruction or damage.

We can show how we comply with these principles (accountability).

4. What we collect and why

We collect only what we need to provide a safe, good-quality place for each young person and to run the organisation:

- **Young people:** name, date of birth, address, school or commissioning details, emergency contacts, medical conditions, allergies, medication, dietary needs, special educational needs and support plans, attendance, accident and incident records, safeguarding information, and photographs where consent has been given.
- **Families:** names, contact details, payment information and correspondence.
- **Staff and volunteers:** recruitment and employment records, DBS check details, qualifications, training, emergency contacts and payroll information.

5. Lawful basis

We rely on the following lawful bases under Article 6 of the UK GDPR:

- **Contract:** to provide the place agreed in our Family Agreement, or under an agreement with a commissioning school or the local authority.
- **Legal obligation:** for example safeguarding referrals, employment and tax records, and health and safety reporting.
- **Vital interests:** to protect a young person's life or health in an emergency.
- **Legitimate interests:** to run The Meadow and communicate with families, where this does not override individuals' rights.
- **Consent:** for optional uses such as photographs, which can be withdrawn at any time.

For special category data, such as health, special educational needs, ethnicity and information about a young person's safety, we rely on Article 9 conditions including: substantial public interest for safeguarding children (Data Protection Act 2018, Schedule 1, paragraph 18); vital interests in an emergency; explicit consent where appropriate; and employment obligations for staff records.

Appropriate policy document. Where we rely on the safeguarding condition, this policy is our appropriate policy document: we process this information only to keep children safe, apply the principles above to it, keep it no longer than our retention schedule allows, and keep it securely with access limited to those who need it.

6. Alternative provision placements

When a school or the local authority commissions a place for a young person:

- we receive referral information from the commissioning school or local authority and use it only to provide the placement and keep the young person safe
- we are responsible as a data controller for the records we create while providing the place, such as registers, incident and accident records, safeguarding records and progress notes
- we share attendance with the commissioning school each session day, and inform the school the same day of any safeguarding concern, accident or significant incident
- we follow any information-sharing agreement or secure-transfer arrangements the school or local authority asks us to use
- at the end of a placement, safeguarding records are passed to the commissioning school's Designated Safeguarding Lead as set out in our Data Retention and Records Management Policy.

7. Sharing information

We never sell personal data. We share it only where it is needed and lawful, for example with:

- commissioning schools and the local authority, as above

- B&NES Children's Social Work Services, the LADO or the police, to protect a child. **Data protection law does not stop us sharing information to keep a child safe**; where needed we will share without consent, and record why
- emergency services in an emergency
- our insurers, accountant and HMRC where required
- the organisations whose services we use to store and send information (Google for email and file storage, and WhatsApp for messaging), under their data protection terms.

8. Keeping information secure

How we keep information secure is set out in our Information Security and Acceptable Use Policy. In summary:

- Meadow email and files are held in our Google account, which **only the directors can access** (the Designated Safeguarding Lead also has access to the safeguarding folder), protected by a strong password. Files are never shared by public link.
- WhatsApp is used for day-to-day messages only. Medical, special educational needs and safeguarding information is never sent by WhatsApp.
- We keep as little on paper as possible. Paper records are kept in locked storage at the hall or at a director's home, stay with a member of staff during sessions, and are cross-cut shredded when no longer needed.

9. International transfers

Google and WhatsApp may store data in data centres outside the UK, mainly in the European Economic Area and the United States. These transfers are covered by UK adequacy regulations (including the UK Extension to the EU–US Data Privacy Framework) and the providers' contractual safeguards.

10. Keeping and disposing of information

We keep personal data only for as long as set out in our Data Retention and Records Management Policy, then delete or securely destroy it.

11. Individuals' rights

Young people, families, staff and others have the right to: be informed; access their personal data; have it corrected; have it erased or its use restricted in some circumstances; object to its use; and data portability. Requests can be made in writing to the Data Protection Lead (no particular form is needed; see our Subject Access Request Procedure). We respond within one calendar month, free of charge in most cases. Where information about a young person is requested, we consider the young person's own rights and maturity.

12. Data breaches

Any actual or suspected breach must be reported to the Data Protection Lead straight away and is handled under our Personal Data Breach Procedure. Where a breach is likely to put people's rights at risk, we report it to the Information Commissioner's Office within 72 hours and tell the people affected. If the breach involves information from a commissioning school or the local authority, we tell them the same day.

13. Training

All staff and volunteers receive data protection training when they join and every year after that, led by the Data Protection Lead using guidance from the Information Commissioner's Office.

14. Contact

Claire Imhasly, Data Protection Lead · themeadowbath@gmail.com · 07411 865399

If you are unhappy with how we have handled your information, please contact us first. You can also complain to the Information Commissioner's Office: ico.org.uk/make-a-complaint · 0303 123 1113.

Reviewed: October 2026 · **Approved by:** the Directors of Meadow Learning CIC · **Next review:** October 2027, or sooner if law or guidance changes