

Data Protection Policy

Rainbow Trees Pathway

Reviewed: September 2025

Next Review Due: September 2026



1. Introduction

Rainbow Trees Pathway is committed to protecting the personal data of the children, young people, adults, families, and professionals we work with. We collect, store, and process personal information in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

This policy outlines how we manage data lawfully, fairly, and transparently, and how individuals can access or challenge the use of their data.

2. Key Contact: Data Protection Officer

Jemma Quarterman

Data Protection Officer (DPO)

Email: hello@rainbowtreespathway.co.uk

Jemma oversees data protection compliance and is the primary contact for any data-related queries or concerns.

3. Scope

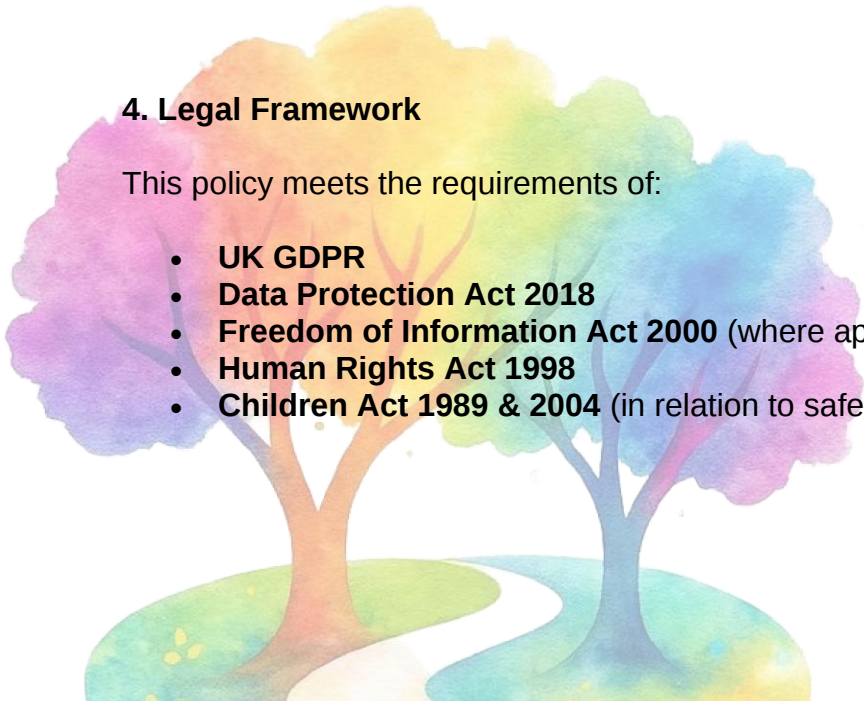
This policy applies to:

- All staff, volunteers, and contractors
- All services provided by Rainbow Trees Pathway, including alternative provision, social care, short breaks, and group work
- All personal data collected or processed in the course of our work

4. Legal Framework

This policy meets the requirements of:

- **UK GDPR**
- **Data Protection Act 2018**
- **Freedom of Information Act 2000** (where applicable)
- **Human Rights Act 1998**
- **Children Act 1989 & 2004** (in relation to safeguarding information)





5. Data We Collect

We may collect the following types of personal and sensitive data:

5.1 Personal Data:

- Name, date of birth, gender
- Contact details (address, phone numbers, email)
- Parent/carer and emergency contact information
- School or educational setting details
- Attendance records

5.2 Special Category (Sensitive) Data:

- Medical and health information (e.g. allergies, diagnoses)
- Educational and psychological assessments
- Safeguarding information
- Ethnicity, religion, or language (where relevant and consented)

We only collect what is necessary and proportionate for the service provided.

6. Lawful Bases for Processing Data

We process personal data under the following lawful bases (UK GDPR, Article 6):

- **Consent** – where individuals or parents/carers have given explicit consent
- **Legal obligation** – where processing is required by law (e.g. safeguarding, SEND duties)
- **Vital interests** – to protect someone's life (e.g. medical emergencies)
- **Public task** – when processing is necessary for our official role as an education or care provider
- **Contract** – for managing service delivery agreements with families, schools, or LAs

We process *special category data* under Article 9 of UK GDPR with additional protections in place, including where it is necessary for:

- Health or social care provision
- Safeguarding of children or vulnerable adults
- Legal or employment obligations

7. How We Use Data





We use data to:

- Deliver services safely and effectively
- Safeguard children and vulnerable adults
- Meet contractual and legal obligations
- Record attendance, incidents, and progress
- Communicate with families, professionals, and schools

8. Data Sharing

We only share personal information when:

- It is necessary to safeguard an individual
- It is required by law or contract
- The data subject or their legal guardian has given explicit consent
- It is in the public interest (e.g. protection from harm)

Information may be shared with:

- Schools and educational settings
- Local Authorities (e.g. SEND, social care, education teams)
- Health professionals (e.g. GPs, CAMHS, paediatricians)
- Emergency services (when required)

We always follow the principle of “**minimum necessary information**” when sharing data.

9. Data Security

We are committed to keeping data secure. Measures include:

- Password-protected devices and systems
- Encrypted email where required
- Lockable storage for paper records
- Secure cloud-based platforms (UK-based or GDPR-compliant)
- Staff training in data protection and confidentiality

Access to data is limited to authorised staff on a need-to-know basis.

10. Data Retention

Data is kept only for as long as necessary:

Type of Data	Retention Period
Attendance, medical, and safeguarding records (for children)	Until the child turns 25
Adult service records	6 years after last contact



Financial records	7 years (HMRC requirement)
Referrals not taken forward	1 year
Staff and volunteer data	As per HR retention policy

After the retention period, data is securely deleted or destroyed.

11. Your Rights

Under UK GDPR, individuals (or parents/carers of under-13s) have the right to:

- Be informed about how their data is used
- Access their data (Subject Access Request)
- Request correction of inaccurate data
- Request deletion of data (in certain circumstances)
- Object to or restrict data processing
- Withdraw consent at any time (where applicable)

Requests can be made by contacting the Data Protection Officer (see section 2).

12. Data Breaches

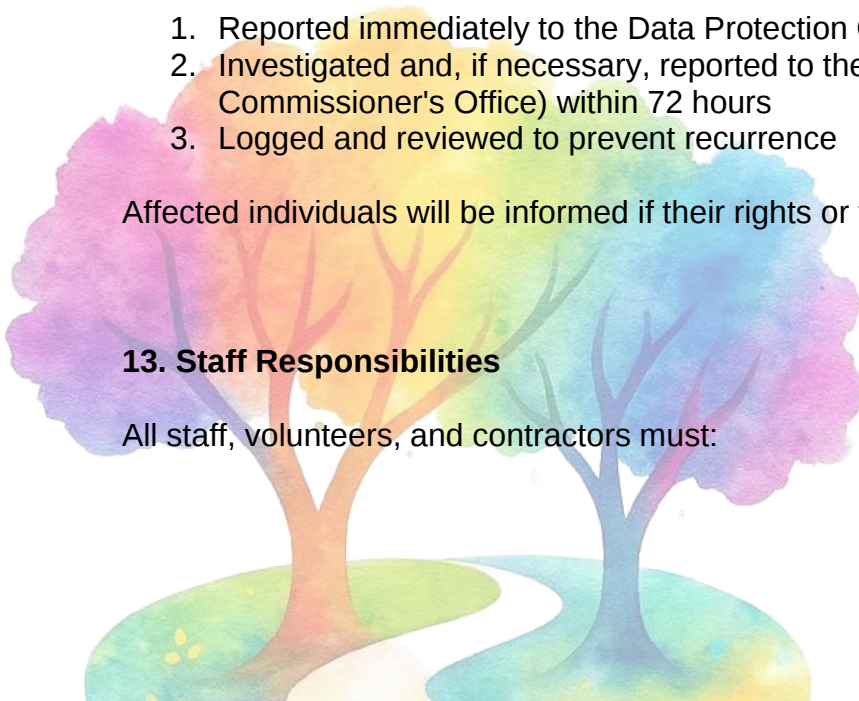
All suspected data breaches must be:

1. Reported immediately to the Data Protection Officer
2. Investigated and, if necessary, reported to the ICO (Information Commissioner's Office) within 72 hours
3. Logged and reviewed to prevent recurrence

Affected individuals will be informed if their rights or freedoms are at risk.

13. Staff Responsibilities

All staff, volunteers, and contractors must:



- Handle personal data responsibly
- Only access data necessary for their role
- Report breaches or concerns promptly
- Complete data protection training regularly

Failure to comply may result in disciplinary action.



14. Policy Review

This policy is reviewed annually or in response to:

- Changes in law or regulation
- A data breach or complaint
- Organisational changes in Rainbow Trees Pathway

Approved by:
Jemma Quarterman
Data Protection Officer
Date: 01.Dec.2025

