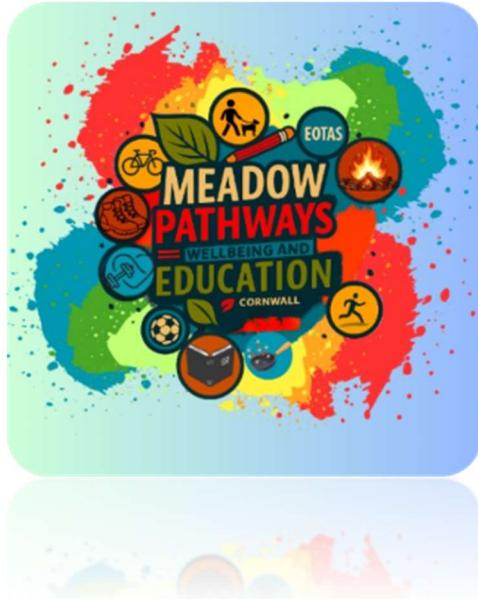


# Meadow Pathways Wellbeing and Education Cornwall (MPWEC)



## Data Protection Policy

### Education other than at School (EOTAS)

*Responsibility to update:* Zoe Waitz and Michelle Pascoe

*Applies to:* All staff, contractors, volunteers and visiting professionals working with children and young people (CYP) engaged in Meadow Pathways EOTAS packages (including tuition in homes, community venues and online).

Version No: 1  
Date: September 2025  
Review Date: September 2026

## **Section 2 – Introduction & Legal Framework**

### **Introduction**

Meadow Pathways Wellbeing and Education Cornwall is committed to protecting the privacy and rights of all children, young people, families, and staff. This policy sets out our responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, ensuring that personal data is handled lawfully, fairly, and transparently.

Our approach reflects our safeguarding ethos: data protection is integral to keeping children safe, maintaining trust, and ensuring compliance with legal and ethical standards.

### **Legal Framework**

- Data Protection Act 2018 (UK GDPR)
- Human Rights Act 1998
- Freedom of Information Act 2000
- Children Act 1989 & 2004
- Education Act 2002
- Equality Act 2010

## **Section 3 – Definitions & Roles**

### **Definitions**

- Personal Data: Any information relating to an identified or identifiable individual
- Special Category Data: Sensitive data such as health, ethnicity, or safeguarding records
- Processing: Any operation performed on personal data (collection, storage, sharing, deletion)
- Data Subject: The individual whose data is being processed

### **Roles and Responsibilities**

- Data Protection Leads: Michelle Pascoe and Zoe Waitz
- All Staff: Must understand and comply with data protection principles
- Directors: Ensure compliance, training, and oversight

### **Data Protection Principles**

#### **All personal data must be:**

- Lawful, fair, and transparent
- Collected for specified purposes
- Adequate, relevant, and limited
- Accurate and up to date
- Stored securely
- Retained only as long as necessary
- Handled with integrity and confidentiality

## **Professional Responsibilities**

- Maintain confidentiality at all times
- Use secure systems for storing and transferring data
- Share information only when necessary for safeguarding, education, or legal compliance
- Ensure children and families understand how their data is used
- Report breaches immediately to the Data Protection Leads

## **Section 5 – Information Sharing & Record Keeping**

### **Information Sharing**

- GDPR is not a barrier to safeguarding. Information will be shared when necessary to protect children
- Data will be shared with local authorities, schools, health services, and safeguarding partners in line with statutory guidance
- Consent will be sought where appropriate, but safeguarding concerns override consent requirements

### **Record Keeping**

- Secure electronic and paper records maintained in line with safeguarding and education requirements
- Access restricted to authorised staff only
- Files transferred securely when children move to new provision

## **Section 6 – Training, Breaches & Rights**

### **Training and Updates**

- Mandatory induction on data protection within the first week
- Annual refresher training for all staff
- Advanced training for Data Protection Leads every two years
- Regular updates via meetings or written bulletins

### **Data Breach Procedures**

- Any suspected breach must be reported immediately to the Data Protection Leads
- Serious breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours
- Families and individuals will be informed if their rights or safety are at risk

### **Rights of Data Subjects**

#### **Children, families, and staff have the right to:**

- Access their personal data
- Request correction of inaccurate data
- Request deletion where lawful
- Restrict or object to processing
- Data portability (where applicable)

## **Section 7 – Compliance & Contact**

### **Compliance and Monitoring**

- Regular audits of data handling and security
- ICO Registration: Meadow Pathways Wellbeing and Education Cornwall is registered with the UK Information Commissioner's Office (ICO) as a Data Controller
- ICO registration details are available on request and published on the ICO register
- Policy reviewed annually or following legislative changes

### **Contact**

#### **For queries or concerns about data protection, contact:**

- Michelle Pascoe – [Michelle.Pascoe@meadowpathwayscornwall.com](mailto:Michelle.Pascoe@meadowpathwayscornwall.com)
- Zoe Waitz – [Zoe.Waitz@meadowpathwayscornwall.com](mailto:Zoe.Waitz@meadowpathwayscornwall.com)