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: 3
Date: September 2026
Review Date: September 2027

Summary of Changes – September 2026 Review

This policy has been reviewed in September 2026 alongside Working Together to Safeguard Children 2026 (in force from 18 March 2026) and Keeping Children Safe in Education (KCSIE) 2026. Key changes made at this review:

- Added reference to the new statutory information-sharing duty introduced by the Children's Wellbeing and Schools Act 2026, and to Working Together 2026's reaffirmed "seven golden rules" for information sharing.
- Clarified that information can and should be shared without consent where seeking consent would itself increase risk to a child or impede a safeguarding investigation.
- Confirmed the legal framework and information-sharing sections otherwise remain accurate and require no other substantive change.
- **Version 3 (September 2026):** sections renumbered; ICO registration number and company details added; link to our Privacy Notice and retention periods added; online sessions and third-party services (such as our website forms) added; Freedom of Information Act removed from the legal framework, as it applies to public authorities rather than private providers.

This summary is provided for ease of reference; the changes are reflected throughout the policy below.

Section 1 – 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.

About Us

- Meadow Pathways Wellbeing and Education Cornwall Ltd is the data controller for the personal information it holds.
- Registered in England, company number 16430906. Registered office: 11 Walsingham Place, Truro, England, TR1 2RP.
- Registered with the Information Commissioner's Office (ICO): registration number ZC004652.

Legal Framework

- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- Human Rights Act 1998
- Children Act 1989 & 2004
- Education Act 2002
- Equality Act 2010
- Children's Wellbeing and Schools Act 2026

Section 2 – Definitions & Roles

Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Special Category Data:** Sensitive data such as health, ethnicity, or information about a person's religion or sexuality. Safeguarding records are treated with the same level of care.
- **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.

Section 3 – Data Protection Principles

All personal data must be:

- Processed lawfully, fairly, and transparently
- Collected for specified purposes
- Adequate, relevant, and limited to what is needed
- Accurate and up to date
- Kept only as long as necessary
- Stored securely and handled with integrity and confidentiality

We tell children, families and professionals how we use their information in our **Privacy Notice**, which is published on our website and available on request.

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 4 – Information Sharing & Record Keeping

Information Sharing

- Data protection law 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.
- In line with Working Together to Safeguard Children 2026's seven golden rules for information sharing, information may be shared without consent where seeking

consent would increase the risk of harm to a child, prejudice a criminal investigation, or cause undue delay in a case where a child may be at risk. This reflects the information-sharing duty introduced by the Children's Wellbeing and Schools Act 2026.

Record Keeping

- Secure electronic and paper records are maintained in line with safeguarding and education requirements.
- Electronic records are kept on Meadow Pathways' secure Microsoft 365 / SharePoint system, protected by passwords and two-factor authentication.
- Access is restricted to authorised staff only.
- Files are transferred securely when children move to new provision.

Retention

Records are kept only as long as needed, in line with our Privacy Notice and statutory guidance. In summary:

- Records of children and young people we support, including safeguarding records: until the young person's 25th birthday (records relating to allegations of child sexual abuse are kept for 75 years).
- Referrals that do not lead to support: 12 months, unless they contain a safeguarding concern.
- General enquiries: 2 years.
- Financial records: 6 years from the end of the financial year.
- Website form submissions: deleted from our form provider once saved to our secure records, and within 30 days.

Online Sessions and Third-Party Services

- Online sessions take place only on Meadow Pathways' approved platform, using organisation accounts. Sessions are not recorded unless agreed in writing in advance, and any recording is stored securely and deleted when no longer needed.
- Where we use third-party services to process personal data on our behalf (for example our email and file storage provider, and Formspree for website forms), we make sure appropriate data protection agreements and safeguards are in place, including for any transfer of data outside the UK.

Section 5 – 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)
- Complain to the Information Commissioner's Office (ico.org.uk, 0303 123 1113)

Requests are free of charge in most cases and are responded to within one month.

Section 6 – Compliance & Contact

Compliance and Monitoring

- Regular audits of data handling and security.
- ICO Registration: Meadow Pathways Wellbeing and Education Cornwall Ltd is registered with the UK Information Commissioner's Office (ICO) as a Data Controller, registration number ZC004652.
- Policy reviewed annually or following legislative changes.

Contact

For queries or concerns about data protection, contact:

- Michelle Pascoe – Michelle.Pascoe@meadowpathwayscornwall.com
- Zoe Waitz – Zoe.Waitz@meadowpathwayscornwall.com