



## **Privacy Notice**

**Next Review:** September 2027

### **1. Introduction**

Dedham Therapy Farm CIC is committed to protecting personal data and being transparent about how we collect, use and store information. This Privacy Notice explains how we handle personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice applies to:

- Farm Assistants (children and young people)
- Parents and carers
- Staff and volunteers
- Referrers and professionals
- Website and service users

### **2. Who We Are**

Dedham Therapy Farm CIC is the data controller for the personal data we process.

**Contact:** [hello@dedhamtherapyfarm.org.uk](mailto:hello@dedhamtherapyfarm.org.uk)

ICO registration - Exempt

Data Protection Lead – Megan Dack

### **3. The Personal Data We Collect**

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

- Names, addresses, email addresses and phone numbers
- Dates of birth and emergency contact details
- Education, attendance and referral information
- Health, wellbeing and safeguarding information
- Communication records

Some of this information is classed as special category data.

### **4. How and Why We Use Personal Data**

We process personal data to:

- Provide therapeutic and educational services
- Safeguard children and young people
- Communicate with parents, carers and professionals
- Meet legal and contractual obligations
- Manage attendance and service delivery

## 5. Lawful Bases for Processing

| Purpose                                         | Information Used                                                         | Lawful Basis                                                                                                                                               |
|-------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Referrals and assessments                       | Contact details, education information, health and wellbeing information | Legitimate Interests and Article 9(2)(h) Health & Social Care                                                                                              |
| Delivering therapeutic and educational services | Attendance records, therapy records, progress reviews and reports        | Legitimate Interests and Article 9(2)(h) Health & Social Care                                                                                              |
| Safeguarding children and young people          | Safeguarding concerns, incident records and related information          | Legal Obligation and Article 9(2)(g) Substantial Public Interest                                                                                           |
| Managing staff and volunteers                   | Recruitment, employment and training records                             | Legitimate Interests, Contract and/or Legal Obligation, together with Article 9(2)(b) Employment, Social Security and Social Protection Law where required |
| CCTV and site security                          | CCTV images and recordings                                               | Legitimate Interests                                                                                                                                       |
| Marketing and newsletters                       | Contact details                                                          | Consent                                                                                                                                                    |

## 6. Consent

Where consent is used:

- It will be clear and recorded
- Consent normally lasts for the duration of involvement unless withdrawn earlier
- Consent can be withdrawn at any time by contacting us

Withdrawal of consent will not affect processing already carried out lawfully.

## 7. Data Accuracy

We take reasonable steps to ensure personal data is accurate and up to date. Individuals are encouraged to notify us of any changes or inaccuracies.

## 8. Data Sharing

We may share personal data with:

- Schools and local authorities
- Health and safeguarding professionals
- Regulatory or statutory bodies

We may also share information with approved service providers who process information on our behalf, such as IT, secure cloud storage, payroll and safeguarding system providers.

We only share the minimum amount of information necessary for the relevant purpose.

## 9. How Long We Keep Data

Personal data is retained in accordance with our Data Retention Schedule. Most service-user records are retained for 10 years after involvement ends. Safeguarding records are retained until the individual reaches age 25 or for 10 years,



whichever is longer. Recruitment, employment, financial and other records are retained in accordance with legal and operational requirements. Further details are available on request.

#### **10. Your Rights**

You have the right to:

- Access your personal data
- Request correction or erasure
- Restrict or object to processing
- Withdraw consent
- Make a complaint to the ICO
- Right to data portability (where applicable)
- Right not to be subject to decisions based solely on automated processing

#### **11. Subject Access Requests (SARs)**

Requests to access personal data should be made in writing. We will respond within one month.

#### **12. Data Security**

We use appropriate technical and organisational measures to protect personal data.

#### **13. Children's Information**

Where a child is considered capable of understanding and exercising their own data protection rights, we will consider requests directly from the child in accordance with applicable law and guidance. Parents and carers may not always have an automatic right to access a child's personal information.

#### **13. International Transfers**

We do not routinely transfer personal data outside the United Kingdom. If an international transfer becomes necessary, appropriate safeguards will be put in place in accordance with UK GDPR requirements

#### **14. Complaints**

If you have concerns about how we use your personal data, please contact us in the first instance so that we can try to resolve the issue.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

#### **Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF



Website: <https://www.ico.org.uk>

Telephone: 0303 123 1113

#### **14. Complaints**

If you have concerns about how your data is used, please contact us. You also have the right to complain to the Information Commissioner's Office.