

GDPR Data Protection Policy

Inspiring Animal Therapy CIC

Introduction

Inspiring Animal Therapy CIC is committed to protecting and respecting your privacy. This GDPR Data Protection Policy explains how we collect, use, disclose, and protect your personal data when you engage with our [AMENDED: mobile and on-site animal-assisted therapy services delivered in schools, alternative provisions, community settings and other external venues], in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

As an outreach and on-site service, we process personal data while working within schools, alternative provision settings and other partner organisations. We handle student data on behalf of educational settings and in accordance with UK GDPR requirements.

We aim to ensure that all personal data we handle is processed in a secure and transparent manner. This policy outlines how we collect, store, and manage your data and explains your rights under UK data protection law.

Data Controller

For the purposes of the UK GDPR and DPA 2018, the data controller is:

Anna Provart – Director
Rebecca Taylor – Director
Inspiring Animal Therapy CIC
18 Jacksons Edge Road,
Disley, SK12 2JE
Email: admin@inspiringanimaltherapy.org
Phone: 07772715804

Data Protection Manager

Our Data Protection Manager (DPM) is: Anna Provart
Email: Anna@inspiringanimaltherapy.org
Phone: 07463913271

If you have any questions regarding how we handle your personal data, you can contact Anna Provart directly.

Alternative Provision, Schools and On-Site Data Management

Inspiring Animal Therapy CIC delivers services as a mobile and on-site provider within schools, community settings, and at our alternative provision base:

The Stables,
The Etherow Centre
Broadbottom,
SK14 6AX

Our Role

Where services are commissioned by a school, local authority, or alternative provision provider:

- 🐾 The commissioning organisation is the Data Controller.
- 🐾 Inspiring Animal Therapy CIC acts as a Data Processor, processing personal data only in accordance with written instructions.
- 🐾 We will enter into Data Processing Agreements where required.
- 🐾 We will assist the Data Controller in meeting their obligations under UK GDPR, including responding to Subject Access Requests, rectification, deletion requests, audits, and ICO enquiries.

Types of Student Data We May Process

To safely deliver alternative provision and therapeutic support, we may process:

- 🐾 Name, date of birth, school and contact details
- 🐾 Emergency contact information
- 🐾 Attendance records
- 🐾 Referral information and consent forms
- 🐾 Risk assessments and behaviour support plans
- 🐾 Safeguarding information and incident reports
- 🐾 SEND information or Education, Health and Care (EHC) details
- 🐾 Medical or mental health information relevant to participation
- 🐾 Session notes, progress records and outcome reports

We only collect and process the minimum information necessary to deliver safe and effective support.

Storage and Security (Mobile and Etherow Centre)

As a mobile and on-site service:

- 🐾 Paper records are stored in locked cabinets in secure staff-only areas (including at the Etherow Centre).
- 🐾 Electronic records are stored on password-protected and encrypted devices or secure cloud systems.
- 🐾 Access is restricted to authorised staff only.
- 🐾 Personal data is not left unattended in shared, public, or vehicle spaces.
- 🐾 Any records transported between locations are carried securely and only when necessary.

Retention, Return and Disposal of Alternative Provision Records

Alternative provision records will be:

- 🐾 Retained until the young person reaches age 25 (or longer if required by safeguarding, contractual, or legal obligations), in line with education and safeguarding record guidance.
- 🐾 Securely returned to the commissioning school or local authority where required at the end of provision or contract.
- 🐾 Provided to the young person or their parent/carer where appropriate and legally permitted.
- 🐾 Securely destroyed once the retention period has expired (cross-shredding for paper records and permanent deletion of electronic data).

Where Inspiring Animal Therapy CIC acts as a Data Processor, all data will be returned or securely deleted upon instruction from the Data Controller

Legal Basis for Data Processing

We process data under:

- 🐾 Consent
- 🐾 Contractual Necessity
- 🐾 Legal Obligation
- 🐾 Legitimate Interests
- 🐾

Where we process health or SEND information, we rely on:

- 🐾 Explicit consent, OR
- 🐾 Provision of health or social care treatment, OR
- 🐾 Safeguarding of children and individuals at risk.

How We Use Your Data

We use personal data to:

- 🐾 Deliver animal-assisted therapy services
- 🐾 Maintain session and safeguarding records
- 🐾 Support educational and emotional outcomes
- 🐾 Communicate with schools and families (where appropriate)
- 🐾 Meet safeguarding and legal obligations
- 🐾 Improve service delivery

Confidentiality Clause

Inspiring Animal Therapy CIC is committed to maintaining strict confidentiality.

- 🐾 All staff and volunteers sign confidentiality agreements.
- 🐾 Personal data is only shared on a need-to-know basis.
- 🐾 Information will not be disclosed to third parties without consent unless:
 - There is a safeguarding concern,
 - There is risk of serious harm,
 - We are legally required to do so.

Where safeguarding concerns arise, confidentiality may be overridden in line with statutory safeguarding duties.

Sharing Your Data

We do not sell or rent personal data.

We may share data with:

- 🐾 Schools or commissioning bodies
- 🐾 Safeguarding authorities
- 🐾 Healthcare professionals (with appropriate legal basis)
- 🐾 Insurance providers
- 🐾 IT service providers

When acting as a Data Processor for schools, we only share data in accordance with the school's instructions and contractual agreements.

Data Retention

We retain data only as long as necessary.

For young people receiving alternative provision or therapeutic support:

- 🐾 Records will generally be retained until the young person reaches the age of 25 (or 26 if the young person was 17 at the end of provision), in line with safeguarding and education record guidance.
- 🐾 Where required by commissioning schools, records may be returned securely to the school at the end of provision.
- 🐾 Where appropriate, records may be securely transferred to the young person (if legally entitled).
- 🐾 After the retention period, records will be securely destroyed.

Financial records will be retained for a minimum of 6 years in line with HMRC requirements.

Data Security

We implement:

- 🐾 Password-protected systems
- 🐾 Encrypted devices
- 🐾 Secure cloud storage
- 🐾 Restricted access controls
- 🐾 Secure transport of paper records (if used onsite)

As a mobile service, we ensure:

- 🐾 Devices are not left unattended.
- 🐾 Paper files are transported securely.
- 🐾 No personal data is stored unnecessarily in vehicles.

Data Breach Procedure

A data breach may include loss, theft, unauthorised access, accidental disclosure, or cyber-attack.

If a personal data breach occurs:

1. We will assess the severity and risk to individuals.
2. If required, we will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach.
3. Where there is high risk to individuals, affected persons (or schools) will be informed without undue delay.
4. We will take immediate steps to contain and mitigate the breach.
5. A breach log will be maintained.

When acting as a Data Processor for schools, we will notify the school (Data Controller) immediately and cooperate fully in managing the breach.

Your Rights Under UK GDPR

You have the right to:

- 🐾 Access your data
- 🐾 Rectify inaccurate data
- 🐾 Request erasure
- 🐾 Restrict processing
- 🐾 Data portability
- 🐾 Object to processing
- 🐾 Withdraw consent

We will respond within one calendar month.

Supporting Schools to Exercise UK GDPR Rights

When working with schools, we will:

- 🐾 Assist with Subject Access Requests (SARs)
- 🐾 Provide copies of relevant data promptly
- 🐾 Support rectification or deletion requests
- 🐾 Assist with data audits or compliance checks
- 🐾 Cooperate with ICO investigations where required

As a Data Processor, we will not respond directly to student SARs unless authorised by the school.

Complaints

If you are unhappy with how we handle personal data, you may contact the ICO:

Website: www.ico.org.uk

Phone: 0303 123 1113

Changes to This Policy

We may update this policy periodically. Updated versions will be made available to schools and service users.

Contact Information

If you have any questions or concerns about this GDPR Data Protection Policy or how we handle your personal data, please contact us at:

Inspiring Animal Therapy CIC

18 Jacksons Edge Road,

Disley,

SK12 2BJ

Email: admin@inspiringanimaltherapy.org

Phone: 07772715804

Legal References:

- **UK GDPR** (as enacted in the UK following Brexit): This regulation governs the processing of personal data within the UK.
- **Data Protection Act 2018**: This Act complements and provides further details on the implementation of the UK GDPR.
- **Information Commissioner's Office (ICO)**: The UK's independent authority for upholding information rights.