

The Baxter Project

Privacy Policy

Therapeutic Activities Group CIC | Company No. 11812101

Effective date: June 2025 | **Last reviewed:** May 2026

Therapeutic Activities Group CIC ("we", "us", "our") operates The Baxter Project. We are committed to protecting the privacy of everyone we work with — including the children and young people who access our intervention, the schools and organisations that commission our services, and all individuals who contact us. This policy explains how we collect, use, store, and protect personal information in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Who We Are

- **Data Controller:** Therapeutic Activities Group CIC, Company No. 11812101, registered in England and Wales.
- **Contact:** hello@thebaxterproject.com | 07999 229837
- **Website:** www.thebaxterproject.com
- If you have any questions about how we handle your data, please contact us at the address above.

2. What Personal Data We Collect

- **Children and young people:** First name, year group, school, presenting needs, session notes, wellbeing assessments (SDQ, SWEMWBS, resilience scales), attendance records, and any safeguarding disclosures.
- **Parents and carers:** Name, contact details, consent form data.
- **School staff and commissioners:** Name, job title, email address, phone number, school or organisation name.
- **Website visitors:** Anonymised usage data via cookies (see Section 9).
- **Job applicants and volunteers:** CV, references, DBS check information.

3. How We Collect Personal Data

- Directly from you — via referral forms, consent forms, email, telephone, or our website contact form.
- From partner schools and local authorities — who refer children to our service.
- During sessions — practitioner session notes and wellbeing measures recorded in our ODISSYS data platform.

4. Legal Basis for Processing

- **Consent:** Where we have obtained explicit written consent (e.g. parental consent for a child to access The Baxter Project).
- **Legitimate interests:** For service delivery, communications with commissioners, and safeguarding.
- **Legal obligation:** Where we are required to process data to comply with safeguarding duties, statutory reporting, or regulatory requirements.
- **Public task / vital interests:** In safeguarding emergencies.

5. How We Use Your Data

- To deliver The Baxter Project intervention and support individual children.
- To record, monitor and report on outcomes for schools, local authorities, and funders.
- To fulfil our safeguarding and duty-of-care obligations.
- To communicate with commissioners and partner schools about service delivery.
- To improve and develop our services, including through anonymised analysis via ODISSYS.
- To respond to enquiries submitted via our website or email.

6. Data Sharing

- We do not sell personal data to any third party.
- We may share data with: partner schools and local authorities in relation to specific pupils; statutory agencies (e.g. children's services, police) where required by safeguarding obligations; our data platform provider (ODISSYS), bound by a Data Processing Agreement; funders and commissioners on an anonymised or aggregated basis only.
- Any third-party processors are required to comply with UK GDPR and are bound by appropriate contracts.

7. Data Retention

- Child and session records: retained for 7 years from the date of the last session, in line with recommended practice for organisations working with children.
- Consent forms: retained for the duration of the intervention plus 7 years.
- Enquiry and contact data: retained for 2 years after last contact.
- Financial and contractual records: retained for 7 years in line with HMRC guidance.
- After the applicable retention period, data is securely deleted or anonymised.

8. Your Rights

- **Right of access:** You may request a copy of the personal data we hold about you.
- **Right to rectification:** You may ask us to correct inaccurate data.
- **Right to erasure:** You may ask us to delete your data where there is no lawful reason to retain it.
- **Right to restrict processing:** You may ask us to pause processing of your data.
- **Right to data portability:** You may request your data in a machine-readable format.
- **Right to object:** You may object to processing based on legitimate interests.

- **Rights relating to children:** Parents and carers may exercise rights on behalf of children in our care.
- To exercise any of these rights, please contact us at hello@thebaxterproject.com. We will respond within one calendar month.

9. Cookies and Website Data

- Our website (www.thebaxterproject.com) uses essential cookies for functionality and, where consented, analytics cookies to understand how visitors use the site.
- We do not use advertising or tracking cookies.
- You can manage cookie preferences through your browser settings.

10. Security

- We take data security seriously. Personal data is stored securely within ODISSYS, which uses encrypted, UK-based servers. Access is restricted to authorised practitioners and administrators.
- In the event of a data breach that is likely to result in a risk to the rights and freedoms of individuals, we will notify the Information Commissioner's Office (ICO) within 72 hours, and affected individuals without undue delay.

11. Safeguarding and Confidentiality

- The Baxter Project operates within a trauma-informed, child-first framework. Practitioners explain the limits of confidentiality to children and young people before sessions begin.
- Where a child discloses information suggesting they or another person is at risk of harm, our practitioners are required to follow our safeguarding procedures, which may involve sharing information with statutory agencies without consent.

12. Complaints

- If you are unhappy with how we have handled your personal data, please contact us in the first instance at hello@thebaxterproject.com.
- You also have the right to lodge a complaint with the Information Commissioner's Office (ICO): ico.org.uk | 0303 123 1113.

13. Changes to This Policy

- We review this Privacy Policy annually and whenever there are significant changes to how we process data. The current version will always be available on our website and downloadable from our Partner Resources section.