



## PARTNER RESOURCE · CONFIDENTIAL

# Data Protection & GDPR Summary

Therapeutic Activities Group CIC · The Baxter Project · Version 2.0

This document provides a comprehensive summary of how **Therapeutic Activities Group CIC (The Baxter Project)** collects, uses, stores, protects, and processes personal data in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. It is designed for use by partner schools, local authorities, commissioners, and inspecting bodies, and should be read alongside our full Privacy Policy.

<b>Data Controller</b>	Therapeutic Activities Group CIC
<b>Registered Address</b>	Registered in England & Wales
<b>Company Number</b>	11812101
<b>ICO Registration</b>	Registered with the Information Commissioner's Office (ICO)
<b>DPO / Lead Contact</b>	Dave O'Driscoll, Managing Director
<b>Contact Email</b>	hello@thebaxterproject.com
<b>Document Ref</b>	TBP-DP-001 · Version 2.0
<b>Effective Date</b>	June 2025
<b>Last Reviewed</b>	May 2026
<b>Next Review</b>	August 2026
<b>Approved By</b>	Dave O'Driscoll, Managing Director

## 0 Data Controller & Legal Framework

### 1 Who we are and what law applies

Therapeutic Activities Group CIC is the **Data Controller** for all personal data processed in connection with The Baxter Project. We are a Community Interest Company registered in England and Wales (Co. No. 11812101), operating exclusively in Wales.

All data processing is conducted in compliance with:

- UK General Data Protection Regulation (UK GDPR) — retained in domestic law via the European Union (Withdrawal) Act 2018
- Data Protection Act 2018
- The Network and Information Systems (NIS) Regulations 2018 (where applicable)
- ICO guidance on special category data, children's data, and educational settings

■ **Therapeutic Activities Group CIC is registered with the Information Commissioner's Office (ICO) as a Data Controller.**



## 0 Data We Collect & Why

### 2 Categories, purposes and lawful basis

<b>Child / Young Person</b>	First name, year group, school, presenting needs, session notes, wellbeing assessments (SDQ, SWEMWBS, resilience scales)	Deliver intervention; record outcomes; safeguarding	Consent (parental); Legitimate interests; Legal obligation (safeguarding)
<b>Parent / Guardian</b>	Name, relationship, email, phone number, consent form data	Consent management; communication; safeguarding	Consent; Legitimate interests
<b>School Staff / Commissioners</b>	Name, job title, email, school/org name, phone	Service delivery; partnership management; reporting	Legitimate interests; Contract
<b>Practitioners</b>	Name, contact details, DBS number, training records, supervision notes	HR; safeguarding compliance; operational management	Contract; Legal obligation
<b>Website Visitors</b>	Anonymised usage data via cookies	Improve website; analytics	Consent (where analytics cookies used)

**Special Category Data: Where session notes contain information relating to health, mental health, or family circumstances, this constitutes special category data under UK GDPR Article 9. This data is processed only with explicit consent and/or under the substantial public interest condition, and is subject to enhanced security and access controls.**

## 0 Consent Management

### 3 How we obtain, record, and manage consent

Before any child begins working with The Baxter Project, we require **written consent from a parent or guardian**. Consent is obtained via our branded Digital Consent Form or the Wet Signature Consent Form (paper copy).

<b>Consent Route</b>	Digital form (thebaxterproject.com/consent) or paper wet signature form
<b>Who Consents</b>	Parent, guardian, foster carer, or other person with parental responsibility
<b>What is Consented</b>	Participation in sessions · data recording in ODISSYS · sharing with the commissioning school · p
<b>Consent Records</b>	Stored securely in ODISSYS with timestamp, form version, and submitting parent details
<b>Right to Withdraw</b>	At any time by contacting hello@thebaxterproject.com or informing the school — no detriment to
<b>Child Assent</b>	Practitioners discuss confidentiality limits with children before sessions begin, in age-appropriate
<b>Review</b>	Consent is not time-limited but practitioners refresh verbal agreement at the start of each term

**■ Consent records are retained for the duration of the intervention plus 7 years, in line with recommended practice for organisations working with children.**



## 0 Data Storage & ODISSYS

### 4 Where data is held and how it is secured

All session data, wellbeing assessments, and personal records are stored in **ODISSYS** — a bespoke digital platform developed by and for The Baxter Project. ODISSYS was built from frontline practice and has been studied by Cardiff University Data Science Academy.

<b>Platform</b>	ODISSYS (proprietary, purpose-built for The Baxter Project)
<b>Server Location</b>	UK-based encrypted servers
<b>Encryption</b>	Data encrypted at rest and in transit (TLS 1.2+)
<b>Access Controls</b>	Role-based access — practitioners see only their own pupils; senior staff and MD have oversight
<b>Authentication</b>	Password-protected accounts with enforced complexity requirements
<b>Audit Logging</b>	All data access and amendments are logged with user ID and timestamp
<b>Backups</b>	Automated daily backups retained for 30 days
<b>Third Party Access</b>	No third-party access without Data Processing Agreement in place
<b>Paper Records</b>	Minimal paper use; any paper records stored in locked cabinets and securely disposed of when n

■ ODISSYS aligns with ESG and TOMs (Themes, Outcomes and Measures) frameworks and has been independently reviewed by Cardiff University Data Science Academy.

## 0 Data Sharing & Third Parties

### 5 Who we share data with and on what basis

We do not sell personal data to any third party. Data sharing is limited to what is strictly necessary for service delivery, safeguarding, or statutory compliance.

Recipient	Data Shared	Basis	Safeguard
<b>Commissioning school / LA</b>	Session summaries, wellbeing outcomes, attendance, anonymised reports	Contract; Legitimate interests	Only the named school contact receives pupil-level data
<b>Funders (e.g. National Lottery)</b>	Anonymised / aggregated outcomes only — no individual pupil data	Legitimate interests; Grant conditions	Data is fully anonymised before sharing
<b>Statutory agencies (police, children's services)</b>	Specific data as required by safeguarding duty	Legal obligation; Vital interests	DSL authorises all such disclosures; logged in ODISSYS
<b>ODISSYS platform provider</b>	All data held within the platform	Data Processing Agreement in place	UK-based; contractually bound; no independent access



<b>Cardiff University (research)</b>	Anonymised / aggregated data only	Research agreement; participant consent where required	No identifiable data shared
--------------------------------------	-----------------------------------	--	-----------------------------

## 0 Data Retention Schedule

### 6 How long we keep data and why

Data Type	Retention Period	Rationale	Disposal Method
Child session records & notes	7 years from last session	Recommended minimum for records relating to children in therapeutic/support settings	Secure deletion from ODISSYS; shredding if paper
Consent forms	Duration of intervention + 7 years	Demonstrates lawful basis for processing; potential legal proceedings	Secure deletion
Wellbeing assessments (SDQ, SWEMWBS)	7 years from completion	Outcome evidence; potential research use (anonymised)	Secure deletion
Parent/guardian contact details	Duration of engagement + 2 years	Communication and follow-up purposes	Secure deletion
School staff / commissioner data	2 years after last contact	Business continuity; relationship management	Secure deletion
Financial & contractual records	7 years	HMRC requirements; Companies House obligations	Secure deletion / shredding
Practitioner HR records (DBS, training)	Duration of employment + 6 years	Employer obligations; potential legal proceedings	Secure deletion / shredding
Safeguarding records	Until subject's 25th birthday, or 75 years if serious case	Statutory safeguarding guidance (WSCP / KCSIE)	Secure deletion with authorisation by DSL
Website analytics (anonymised)	26 months	Standard analytics retention period	Automatic purge via analytics platform



## 0 Individual Rights

### 7 Your rights under UK GDPR and how to exercise them

All individuals whose data we hold have the following rights under UK GDPR. These rights apply to children (exercised by parents/carers where appropriate) and all adults.

Right	Description	How to Exercise
<b>Access (Subject Access Request)</b>	Receive a copy of all personal data we hold about you or your child	Email <a href="mailto:hello@thebaxterproject.com">hello@thebaxterproject.com</a> — we respond within one calendar month
<b>Rectification</b>	Correct any inaccurate or incomplete personal data	Contact us by email — corrections made within one month
<b>Erasure ('Right to be Forgotten')</b>	Request deletion of data where there is no lawful reason to retain it	Subject to retention obligations and safeguarding duties
<b>Restriction of Processing</b>	Pause the use of your data while accuracy or lawfulness is disputed	Contact us by email
<b>Portability</b>	Receive data in a structured, machine-readable format	Applies to data processed by consent or contract only
<b>Object</b>	Object to processing based on legitimate interests	We will cease processing unless compelling grounds exist
<b>Rights re: Automated Decisions</b>	Not to be subject to solely automated decision-making with legal effect	No solely automated decisions are made by The Baxter Project
<b>Withdraw Consent</b>	Withdraw consent at any time without penalty or detriment	Contact <a href="mailto:hello@thebaxterproject.com">hello@thebaxterproject.com</a> or inform the school

■ We respond to all Subject Access Requests within one calendar month. We do not charge a fee for reasonable requests.

## 0 Data Breach Management

### 8 How we detect, report, and manage breaches

Therapeutic Activities Group CIC has a documented Data Breach Response Procedure. All staff are trained to recognise and report potential breaches.

<b>Detection</b>	Any suspected breach must be reported to the MD/DPO (Dave O'Driscoll) immediately upon discovery
<b>Assessment</b>	Risk assessed within 24 hours: likelihood and severity of impact on data subjects
<b>ICO Notification</b>	If likely to result in a risk to individuals' rights and freedoms, the ICO is notified within <b>72 hours</b> of discovery
<b>Individual Notice</b>	Affected individuals notified without undue delay where there is a high risk to their rights and freedoms
<b>Documentation</b>	All breaches (reportable or not) documented in the Breach Register held in ODISSYS, including: date, nature, and impact
<b>Review</b>	Root cause analysis conducted following any breach; policies updated where necessary



ICO Contact

ico.org.uk · 0303 123 1113 · casework@ico.org.uk

## 0 Children's Data — Special Considerations

### 9 Enhanced protections for under-18 data subjects

The Baxter Project works exclusively with children and young people. We apply enhanced protections to all data relating to under-18s, in line with the ICO's Children's Code (Age Appropriate Design Code) principles and statutory safeguarding guidance.

- **Parental/guardian consent is always obtained** before a child participates and before any personal data is recorded
- **Children are not identified** in any public-facing materials without separate explicit written consent from a parent or guardian
- **Photo and media consent** is collected separately and is entirely optional — it does not affect a child's access to the intervention
- **Practitioners explain confidentiality limits** to children before sessions in age-appropriate language
- **Children's data is never shared** for commercial purposes or with third parties beyond those listed in Section 5
- **Safeguarding overrides confidentiality** — if a child discloses risk of harm, practitioners follow our safeguarding procedure, which may require sharing without consent
- **Access to individual child records** in ODISSYS is restricted to the assigned practitioner and senior management only

## 1 Safeguarding & Data Protection Interface

### 0 Where these two duties meet

Safeguarding obligations may require us to share personal data without consent. This is lawful under UK GDPR Article 6(1)(c) (legal obligation) and Article 9(2)(g) (substantial public interest). The Baxter Project's position on this interface is as follows:

<b>DSL</b>	Dave O'Driscoll (Managing Director) is the Designated Safeguarding Lead. Deputy DSL appointed at Board level
<b>Disclosure</b>	All safeguarding disclosures are logged in ODISSYS within 24 hours with practitioner name, date, content, and action
<b>Referral</b>	Where a referral to children's services or police is required, this is made by the DSL and documented in ODISSYS
<b>Data Sharing</b>	Information shared with statutory agencies is limited to what is strictly necessary, documented, and reported to the DSL
<b>School Liaison</b>	The commissioning school's designated safeguarding lead is informed of any safeguarding action taken
<b>Records</b>	Safeguarding records are retained for the period stated in Section 6 and are not subject to erasure requests



# 1 Staff Training & Awareness

## 1 Ensuring our people understand their obligations

<b>Induction Training</b>	All new staff and practitioners complete data protection induction before working with pupils or handling personal data
<b>Annual Refresher</b>	Mandatory annual data protection refresher training for all staff
<b>Safeguarding Training</b>	All practitioners complete safeguarding training annually in line with statutory guidance (KCSIE / WSCP)
<b>DBS Checks</b>	Enhanced DBS checks for all practitioners prior to working with children — renewed every 3 years or upon a change of role
<b>Confidentiality</b>	All staff sign a confidentiality agreement as part of their contract; breach is treated as a disciplinary matter
<b>Acceptable Use</b>	An Acceptable Use Policy governs all access to ODISSYS and any personal data
<b>Records</b>	Training records for all staff held in ODISSYS with completion dates and certificate reference

# 1 Complaints & Escalation

## 2 What to do if you have concerns

If you have concerns about how your data or a child's data has been handled, please follow the process below:

<b>Step 1 — Contact Us</b>	Email <a href="mailto:hello@thebaxterproject.com">hello@thebaxterproject.com</a> . We aim to acknowledge within 2 working days and resolve within 20 working days
<b>Step 2 — Escalate</b>	If unsatisfied with our response, you may escalate to Dave O'Driscoll, Managing Director, at the same email address
<b>Step 3 — ICO Complaint</b>	You have the right to lodge a complaint with the ICO at any time: <a href="http://ico.org.uk">ico.org.uk</a> · 0303 123 1113

**ICO Contact Details: Information Commissioner's Office · Wycliffe House, Water Lane, Wilmslow, SK9 5AF · 0303 123 1113 · [ico.org.uk](http://ico.org.uk) · [casework@ico.org.uk](mailto:casework@ico.org.uk)**

<b>Document Title</b>	Data Protection & GDPR Summary
<b>Organisation</b>	Therapeutic Activities Group CIC (The Baxter Project)
<b>Version</b>	2.0
<b>Approved By</b>	Dave O'Driscoll, Managing Director
<b>Date Approved</b>	May 2026
<b>Next Review</b>	August 2026
<b>Full Privacy Policy</b>	Available at <a href="http://www.thebaxterproject.com">www.thebaxterproject.com</a> and on request
<b>Related Documents</b>	Safeguarding Policy · Consent Form · Privacy Policy · Acceptable Use Policy · Breach Register

***“Positive engagement, positive relationships, positive change.”***