Confidentiality and Data Protection Policy
September 2025

Rachel Clark Consulting (RCC) is a UK based Educational Consultancy specialising in Inclusion and parenting support. RCC respects your privacy and is committed to protecting your personal data. This confidentiality and data protection policy informs you about how I look after your personal data when you use my services.

Collection of personal information

I collect and process your personal information in order to provide correct educational based advice to you and your children. RCC is the controller of any personal data you provide to me. The personal information I collect depends upon the nature of my relationship with you as the data subject.

Clients and Suppliers

With regards to clients, potential clients and suppliers, I will collect and process names, addresses, email addresses, phone numbers and bank account details which I use in the following ways:

- In the performance of mine or their contractual obligations or as part of my legal obligations;
- With a legitimate interest in maintaining a professional relationship with potential clients (taking into consideration their individual rights and freedoms).
- On occasion collect witness or third party names, addresses and phone numbers as part of my insurance obligations.
- I may collect non-personal information such as geographical location, details pertaining to processes, documents and arrangements. These are collected as part of the services I provide and are not held for any other purpose. You cannot be identified from this information and it is only used to assist me in providing an effective service.

I will use your personal and non-personal information only for the purposes for which it was collected or agreed with you, for example:

- To confirm and verify your identity or to verify that you are an authorised customer for security purposes;
- To carry out my obligations arising from any contracts entered into between you and me;
- To notify you about changes to my service;
- For the detection and prevention of fraud, crime, or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;

- For audit and record keeping purposes;
- In connection with legal proceedings;
- To comply with legal and regulatory requirements or industry codes to which I subscribe or which apply to me, or when it is otherwise allowed by law;
- To respond to your queries or comments.

Data on children, young people and families

The categories of pupil & parent information that I collect, hold and share include but are not limited to:

- Personal information (such as name, unique pupil number and address, parents national insurance number).
- Contact details and preference (contact telephone numbers, email addresses, addresses).
- Characteristics (such as ethnicity, religion, language, nationality, country of birth and free school meal eligibility).
- Attendance information (such as tuition sessions attended, number of absences and absence reasons).
- Assessment information (such as information given by the school).
- Relevant medical information.
- Special educational needs information (such as EHCPs, CAMHS reports, tuition referral forms, care or support plans).
- Safeguarding information.
- Exclusion information.
- Behavioural information.
- Photographs (with specific consent only).

Why I collect and use this information

I use child and parent data:

- To provide the best possible support and advice to the school, setting, organisation or parents/carers.
- To support pupil learning.
- To monitor and report on pupil progress.
- For safeguarding purposes.
- To assess the quality of my services.
- To comply with the law regarding data sharing.

What I do with information

Personal data is processed in order to provide the service I am commissioned to undertake, to ensure all relevant stakeholders are informed as required, to run an efficient and

compliant service. I use different systems and platforms to manage the data I process, and a list of the key data processors are listed below:

- Sync – Encryption system used for storage
- Egress – Encryption system used for sensitive emails and attachments.
- Google workspace (Google Drive) – storage of records and commercial, production, logistical, operational, research and administrative activities.

I may also share personal data with partners and in line with my regulatory or statutory obligations. In all instances, data will only be shared in line with an appropriate lawful basis for processing. Data sharing follows a risk assessment to ensure the necessary safeguards and control measures are in place prior to any data sharing.

How long I keep your information

If there is no contract or provision of services to or by RCC, then I will look to retain records for no longer than is necessary. I are legally bound to hold certain data for prescribed lengths of time, including: Financial data and pensions – 6 years. Contract data – 3 years.

I hold pupil and family data whilst RCC is involved with the child. When the assignment is finished and I no longer work with the child or the family, the information is all transferred to the data controller who has commissioned the work (school, LA or parents/carers) and I delete all data after 3 months unless told otherwise. I do not share information about my pupils with anyone without consent unless the law and my policies require me to do so. I am required to share information about any safeguarding concerns if I feel that a child is at risk of harm. I will report any such concerns to the Safeguarding lead of the data controller who has commissioned my services or, if necessary, to the relevant local authority social services.

What are your Data Subject Access Rights?

You have the following rights as a Data Subject:

- Right to access – you have the right to request a copy of all data I hold about you;
- Right to rectification – where any data I hold is incorrect you have the right to ensure it is correct;
- Right to be forgotten – if you no longer wish for me to hold your data, I will delete it;
- Right to restrict processing – since I only use this to contact you, there is no processing to restrict, I would simply delete the information wherever possible and in keeping with my own obligations.
- Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 13 but can be older under the Mental Capacity Act, or

where the child has provided consent). If a parent/carer make a subject access request, and if I do hold information about you or your child, I will:

- Give you a description of it
- Tell you why I am holding and processing it, and how long I will keep it for
- Explain where I got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Give you a copy of the information in an intelligible format.

If at any point you believe the information I process on you is incorrect, you may request to see this information and even have it corrected or deleted. If you wish to raise a complaint on how I have handled your personal data, please contact me in the first instance. If you are not satisfied with my response or believe I am processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office.

Data Protection Lead: Rachel Clark
Email: rachel@rachelclarkconsulting.com
Tel: 07956213407

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