



## **Bright Family Pathways Ltd Data Protection and Confidentiality Policy**

### **1. Purpose**

Bright Family Pathways Ltd is committed to protecting personal data and respecting the privacy of service users, in accordance with UK GDPR and the Data Protection Act 2018.

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### **2. Data Controller**

Bright Family Pathways Ltd acts as the Data Controller for all personal data processed in connection with its services.

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### **3. Personal Data Processed**

We may collect and process:

- Names, contact details, and identification information
  - Information relating to children and family circumstances
  - Court orders and legal documents
  - Professional records, session notes, and reports
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### **4. Lawful Basis for Processing**

Personal data is processed under one or more of the following lawful bases:

- Performance of a contract
  - Legal obligation
  - Vital interests of a child
  - Legitimate interests in relation to safeguarding and service delivery
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### **5. Storage and Security**

- Records are stored securely in locked cabinets and/or encrypted digital systems.



- Access is restricted to authorised personnel only.

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## **6. Data Sharing**

Data may be shared:

- Where required by law or court order
- With safeguarding authorities
- With professional advisers where necessary and proportionate

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## **7. Data Retention**

Information is retained in line with legal, safeguarding, and professional requirements and securely destroyed when no longer required.

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## **8. Individual Rights**

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate information
- Request erasure where appropriate
- Raise concerns with the Information Commissioner's Office (ICO)

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## **9. Data Breaches**

Any data breach will be managed in accordance with legal requirements and reported to the ICO where required.

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## **10. Review**

This policy is reviewed annually and updated as required to reflect changes in data protection legislation, guidance, or organisational practice.