



Roots & Waves

DATA PROTECTION POLICY

Bespoke and personalised individual 1:1/small group academic tutoring and holistic mentoring for home-educated young people and young people with SEND - London Borough of Sutton

Our Delivery Context

Roots & Waves provides individual, personalised, holistic 1:1/small groups mentoring for home-educated young people and young people with special educational needs and/or disabilities (SEND), with a primary focus on re-engagement, wellbeing and confidence. Tutoring/mentoring sessions may include some literacy and numeracy, but Roots & Waves is not a school and does not deliver a full academic curriculum. Throughout our policies, young people are referred to as participants and parents/carers as clients.

We do not operate from fixed premises. Sessions are delivered 1:1/small groups in the community and in participants' homes, including outdoor woodland ("forest school" style) locations. Locations may change at short notice. Staff and participants may travel to sessions independently, including by car, and sessions are participant-led: staff dynamically assess risks and adapt activities, teaching and planning as each session develops.

Roots & Waves is currently a sole-practitioner organisation: the Director, Designated Safeguarding Lead (DSL) and learning collaborator are the same person. Because internal escalation is not possible, our procedures build in clear external routes: the Sutton Local Authority Designated Officer (LADO), Sutton Children's First Contact Service (CFCS), and an external safeguarding support Mark Wrangles, Consultant at Close the Gaps. All policies are aligned to Keeping Children Safe in Education (KCSIE) 2026 and the procedures of the Sutton Local Safeguarding Children Partnership (LSCP).

Purpose

Roots & Waves places high importance on the correct, lawful and fair handling of personal data, respecting the legal rights, privacy and trust of everyone we work with. Our data is small in volume but high in sensitivity: safeguarding records, SEND and health information, and tutoring/mentoring session records about vulnerable young people — much of it created and carried in the community rather than at a desk. This policy reflects that.

Scope

This policy covers all personal data processed by Roots & Waves: data about participants and clients (the core of our processing), and data about the Director, future job applicants, employees, volunteers and contractors. Roots & Waves is a data controller, registered with the ICO [registration reference: ZC234381]. Alexandra Huggett - Director, is the data protection lead; as a small organisation Roots & Waves is not required to appoint a statutory DPO, and independent advice is taken where needed.

What We Hold

- Participants: name, date of birth, contact details, SEND and health information (including ISPs and medication records), safeguarding records, tutoring/mentoring session logs, risk assessments, progress records, photographs (with consent), and information from commissioners and other agencies
- Clients: names, contact details, emergency contacts, agreements and correspondence, and financial records for invoicing
- Workforce (current and future): recruitment records, references, DBS outcomes, training records, and contractual information
- A proportionate Record of Processing Activities (ROPA) documents purposes, lawful bases, recipients, retention and security for each category

Special category data (health, SEND and safeguarding-relevant data) is processed under Article 9 conditions including health and social care and substantial public interest — safeguarding of children (DPA 2018 Schedule 1), with an Appropriate Policy Document in place. For DBS (criminal offence) data: Roots & Waves does not retain certificate copies; we record date, level, certificate number and decision, and any exceptionally held copy is destroyed within 6 months (see Safer Recruitment Policy).

Principles and Rights

All personal data is processed lawfully, fairly and transparently; collected for specific legitimate purposes; minimised to what is necessary; kept accurate; retained no longer than needed under our retention schedule (safeguarding records are retained in line with safeguarding guidance, which can be substantially longer than other records); and secured appropriately. We honour all data subject rights: information (via our Privacy Notice, given to every client at the start of the relationship), access, rectification, erasure, restriction, portability and objection. Subject access requests go to Alexandra Huggett in writing and are answered within one month (extendable by two for complex requests); identity is verified; for requests about a participant we consider the young person's capacity and best interests, and statutory exemptions (safeguarding, third-party data) are applied and explained. Timely sharing for safeguarding purposes is never blocked by data protection — DPA 2018 and UK GDPR explicitly permit it (see Child Protection & Safeguarding Policy).

Data Security in a Mobile Delivery Model

Because there is no office, our security controls are built for working on the move:

- Digital-first records held in UK/EEA-hosted cloud services with strong authentication (MFA), encryption in transit and at rest, and automatic screen locking on all devices
- Devices used for Roots & Waves work are encrypted, PIN/biometric protected, and kept in the learning collaborator's control — never left visible in a vehicle; tutoring/mentoring session notes are written into the secure system, not kept as loose paper; any unavoidable paper (e.g. signed consent forms) is transferred to secure digital storage promptly and the paper securely destroyed or securely stored
- Personal email and personal cloud storage are never used for Roots & Waves data; the participant emergency information carried to sessions is the minimum necessary
- Processor contracts (cloud providers, any future payroll etc.) include UK GDPR Article 28 clauses; international transfers, if any, use UK IDTA/ICO Addendum safeguards and are listed in the ROPA
- DPIAs are completed for any new high-risk processing (e.g. new platforms holding participant data)

Sharing

Data is shared only where necessary and proportionate, with a recorded lawful basis: with commissioning schools/LAs (controller-to-controller, under placement agreements — same-day safeguarding and attendance information); with Sutton children's services, police and safeguarding partners where legally justified; with health professionals under IHP arrangements; and with clients regarding their own child, subject to safeguarding judgement. Roots & Waves is not a public authority, so FOIA does not generally apply.

Breaches

Suspected breaches are contained, assessed and logged immediately (facts, effects, remedial action). Where a breach is likely to risk individuals' rights and freedoms, the ICO is notified within 72 hours (initial notification followed up if details are incomplete); where high risk, affected individuals are told without undue delay. Realistic scenarios for our model — a lost phone, a car break-in, a misdirected email — are specifically planned for: device encryption and remote wipe make device loss containable, and the response steps are documented.

Key Safeguarding Contacts



Alexandra Huggett - Director, DSL and Learning Collaborator, Roots & Waves	07469 621539 / hello@rootsandwaves.co.uk
External safeguarding support	Mark Wrangles support@closethegaps.co.uk
Sutton Children's First Contact Service (CFCS) - referrals and advice (Mon-Fri, 9am-5pm)	020 8770 6001 / CFCS@sutton.gov.uk
Sutton out-of-hours Emergency Duty Team	020 8770 5000
Sutton LADO - allegations against adults who work with children	020 8770 4776 / LADO@sutton.gov.uk
Sutton LSCP procedures	www.suttonlscp.org.uk
Police	999 (emergency) / 101 (non-emergency)
NSPCC helpline	0808 800 5000
CEOP (online sexual abuse/exploitation reporting)	www.ceop.police.uk

Policy Context

Legislation: UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025 (as amending UK GDPR/DPA 2018); Human Rights Act 1998; PECR 2003 where applicable. Related documents: Privacy Notice; retention schedule; Child Protection & Safeguarding Policy; Safer Recruitment Policy; E-Safety Policy.

Version Control

We review our documentation regularly and reserve the right to amend our policies and procedures at any time.

REFERENCE:	V01 - 07/2026
OWNERSHIP:	Alexandra Huggett, Director - Roots & Waves
AUTHORISED BY:	Alexandra Huggett, Director
REVIEW:	Annually - September 2027, or sooner if guidance or delivery changes

Version	Date	Change summary	Author/Reviewer	Approved by
1	09/2026	Initial Roots & Waves version: participant/client data at the core; mobile-working security controls; sole-practitioner accountability structure	Alexandra Huggett - Director	Alexandra Huggett - Director