



Reach for the Stars Coaching – Data Protection Policy

Policy Owner: Tracey Harvey

Effective Date: May 2025

Review Date: April 2026

Introduction

Reach for the Stars Coaching is a private coaching service providing one-to-one mental health and wellbeing coaching programmes for children and families. This Data Protection Policy outlines how we collect, store, use, and protect personal information, particularly data concerning children and their families, in compliance with the Data Protection Act 2018 and UK GDPR.

Your Data Rights

Under the UK General Data Protection Regulation (UK GDPR), individuals have the right to access personal data held about them. This is known as a **Subject Access Request (SAR)**.

Exemptions to Data Access

Reach for the Stars Coaching may refuse a subject access request in certain circumstances, such as:

- Where disclosure would jeopardise the prevention or detection of crime or the apprehension or prosecution of offenders.
- If disclosure would put a child's welfare at risk.
- If the data is protected by legal professional privilege.

If any data is withheld, we will explain the reason and the relevant legal exemption, unless doing so would itself compromise protected information.



Protecting Third-Party Data

When responding to a request, we may redact information relating to others unless we have their explicit consent to share their data. This is to protect the privacy of all individuals involved.

Parental Consent & Third Parties

- We will not release or share coaching session details without the explicit consent of an adult with **parental responsibility**.
 - If there is uncertainty around parental responsibility, we may request consent from **both parents**.
 - Where a parent or guardian requests, we share information with a third party (e.g., a school, solicitor, social services), we will assess each request on a case-by-case basis in line with legal and safeguarding obligations.
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Exceptions for Disclosure Without Consent

We may share data without consent if:

- There is an immediate risk to the health or safety of a client or another person.
 - We become aware of a **safeguarding concern**.
 - We are required to comply with a **legal obligation** (e.g., court order).
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Storage of Child Data

We retain child data until **5 years after the child turns 18**, unless otherwise agreed in writing and supported by legal advice.

Making a Subject Access Request

Requests must be made in writing. Please include as much detail as possible to help us locate the relevant data.

Once a request is received, we will:



- Acknowledge your request in writing.
- Respond within one month.
- Ask for further identification or clarification if needed.

Information will be sent via **signed-for postal delivery** only and will **not** be sent by email.

Request Contact Details

To request access to your data, please write to:

Tracey Harvey

Email: tracey@reachforthestarscoaching.co.uk

Fees

A nominal fee (not exceeding £10) may be charged for repeated requests or where a request is deemed excessive.

Policy Review

This policy will be reviewed:

- Annually
- In response to changes in legislation or guidance
- Following any significant incident or data breach