The Caldecott Foundation Privacy Notice

1. Scope of this Notice

The Caldecott Foundation wants you to be familiar with how we collect, use and disclose your personal data. We are committed to protecting the privacy and security of your personal data. This Privacy Notice ("Notice") describes how we handle your personal data when you have a relationship with or engage with us or receive services from us.

This Notice covers the various different relationships we may have with you and other data subjects. For that reason, we may not use your personal data to the full extent described in this Notice. The personal data we collect and how we use it depends on your needs and your relationship with us.

It is important that you read this Notice carefully, together with any other privacy notice or fair processing notice we may provide to you on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This Notice supplements other notices and privacy notices and is not intended to override them.

We may change this Notice from time to time by updating this document. We will notify you when we do so.

2. Who we are

We are The Caldecott Foundation Limited, a limited company registered in England and Wales under Company Registration No. 00419256 and a Registered Charity registered in England & Wales under Charity No. 307889. All references in this Notice to "The Caldecott Foundation", "our," "us," or "we," are references to The Caldecott Foundation Limited.

We provide specialist therapeutic care and education services for children in the UK from the age of 4 (our "Services").

We are the data controller responsible for the personal data that we collect and process about you. This means that we determine what personal data we will collect about you and are responsible for what happens to it, where it goes, and who sees it, and you can hold us to account for this.

3. How to contact us

If you have any questions regarding this Notice, our privacy practices or our use of your personal data, please contact us using the below methods:

Address: The Caldecott Foundation
Caldecott House
Hythe Road
Smeeth, Ashford
Kent
TN25 6SP

Email Address: dataprotection@caldecottfoundation.co.uk

Telephone Number: 01303 815 678

You might also choose to use our 'Get In Touch' form to contact us:

4. Our Data Protection Officer (DPO)

We have appointed IT Governance Ltd, trading as GRC Solutions as our DPO. If you would prefer, you can direct questions in relation to this Notice to our DPO directly on the following details:

Email Address: dpoaas@grcsolutions.io

Telephone Number: 0333 800 7000

5. What is meant by “personal data”?

Personal data (also called personal information) is any information that alone, or in combination with other information that The Caldecott Foundation has, or is likely to have access to, can or does identify you as an individual.

Examples of personal data include your name, address, internet protocol (IP) address, username or another identifier.

Some personal data is more sensitive and requires greater protection. This data is referred to as sensitive or special category data and includes things such as information regarding your health, religious beliefs, race, or ethnicity.

6. Where do you get my personal data from?

In order to operate effectively, including for the purposes of administering and providing our Services and / or managing our relationship with you, we may collect and use personal

data about you. The personal data we collect about you can come from different sources including:

6.1 Information you give to us directly when you:

- Are enrolled in our care, education or otherwise use our Services;
- give us feedback or contact us directly via telephone, letter, or email;
- use our online contact or complaints forms, applications, or emails;
- attend our events or exhibitions;
- search for and / or make enquiries about our Services;
- apply for our Services (whether electronically or otherwise);
- apply for a job with us;
- provide us with your identification;
- supply a service or product to us;
- contract a service provided by us;
- provide us with your contact details (families, carers, guardians);
- donate and / or otherwise support us;
- sign our visitors book;
- engage with us via, or use, our social media; or
- network with us at conferences, exhibitions or general business events.

6.2 Information we learn about you through our relationship with you and the way you interact with us such as:

- information we gather about you from our staff, your behaviours and other assessments, discussions and reports;
- information we gather using technology, which you may use to access our Services (for example, an IP address or telephone number), and how you use technology (for example, recognising behavioural patterns);
- your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit to our website(s), including URL clickstream to, through and from our website;
- information we gather about you during the job application process and during interviews;
- information we gather from your visits to / presence at our premises, including information gathered by our security cameras and vehicle dashboard cameras, door entry systems and reception logs;
- information gathered by vehicle trackers on any of our business vehicles you operate or travel in;

6.3 Information we receive from third parties such as:

- information about those in our care that are relevant to the provision of our Services, such as Education, Health and Care Plans, Child and Adult Mental

Health Services reports, and other relevant education and psychology reports;

- information we receive about those in our care from other relevant organisations and bodies such as schools, social work services, local authorities and doctors;
- employee information for payment and employee management services from our partner Caldecott Fostering;
- information we receive from fundraising websites such as JustGiving and the Charities Aid Foundation;
- information we receive from vetted and approved third-party recruitment agencies;
- information we receive from instructing legal firms, public and private clients, and other agents / agencies;
- information we gather from publicly available sources in the public domain such as LinkedIn, Facebook, X, Companies House and The Charity Commission;
- information we gather when seeking references or carrying out other candidate checks related to potential employment opportunities with us;
- information we gather using technology, which you may use to access our Services (for example, an IP address or telephone number), and how you use technology (for example, recognising behavioural patterns).

7. The personal data we collect

We will collect and process personal data about you to enable us to administer our Services and to manage our relationship with you. Whilst much of the personal information you provide to us is mandatory, some of it is requested on a voluntary basis. We will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

In addition, we may also collect personal data from others we interact with in the provision of our Services, who contacts us in connection with the Services or otherwise, such as:

- residents and children in our care (Caldecott minors);
- students;
- parents, guardians, families and foster families;
- minors in Caldecott Fostering's care;
- employees of Caldecott Fostering;
- fundraisers;
- donors and supporters;
- prospective employees, volunteers, and trustees
- social workers and Local Authority staff;
- users of our website and applications, including social media;
- third parties that provide services or products to us.

We may collect, use, store and/or transfer different kinds of personal data about you depending on our relationship with you, which can include:

Behavioural Information:	such as behavioural information relating to actions recorded on CCTV, vehicle dashcams, internet browsing.
Business Contact Details:	such as business contact details including business email address, social media information, postal address and telephone number, relevant team and / or department.
Business Role Information:	professional information, including role, remit and job-related skills and specialism information.
Caldecott Minors' Information:	such as first language, legal status, information about relevant Court Order(s) relating to the relevant individual(s), relatives and family information, information regarding persons with parental responsibilities, life-history, photographs, video footage, relevant information held by the Local Authority, education history and information, health records and medical information, sexuality, ethnicity, religion, therapy data, important dates, information on placements, social worker information, gender reassignment, criminal records information, internet browsing history, CCTV and dashcam image capture, pregnancy status, political and philosophical views, dietary information, preferences, likes and dislikes and any other personal data that a parent or guardian would need to know.
Candidate Information:	such as CV, qualifications, references, right to work documentation, social media information, Driving Licence information, education history and information, work history, salary, images, training records, safeguarding records, qualifications, DBS certifications and criminal records history, relevant health information and information regarding medical conditions, information relating to reasonable adjustments which may be necessary in the workplace, equality and diversity information, and any other information provided during the application process.
Care Information:	such as referral information, assessment information, Section 47 information, initial Child Protection information, doctor's details, Child Protection registered

	status, dates of enrolment, and Child Protection Plan information.
Care Leavers' Information:	such as accommodation arrangements, employment status, address and school after leaving.
Characteristics:	such as gender, biological sex, age, ethnicity and disability, images, tattoos, scars and any other distinguishable characteristics.
Communication Data:	such as records of your contact with us whether a query, compliment, or complaint and any other information you voluntarily provide, including online or through other communication methods.
Contact Data:	such as email address, postal address, telephone number(s), your contact preferences and handles or identifiers from other communication channels, such as messaging systems and social media (for example, Facebook, LinkedIn or X).
Criminal and Background Information:	such as criminal records check (foreign and local) information, DBS check and status, criminal records history and declaration.
Donor Information:	such as Contact Data, direct debit mandates, bank details, high value status, relationships with other donors, donation history, tax details, gift aid declarations.
Driving Information:	including driving licence number, licence endorsements, insurance certificate.
Educational Data:	including educational history, pupil premium status, looked after child status, free school meals status, Unique Pupil Number, Unique Learner Number, attendance information, doctor's details, Child Protection Registered Status, dates of enrolment, incident reports, safeguarding records, class group, date child joined school, year group, registration group, attendance data and exclusion data, dietary requirements, medications, monitoring IT usage e.g. computer login and internet browsing during schooling.
Fundraising and Support Information:	such as records of fundraising events attended, images of the event(s), supported campaigns, areas of interest

	for support of our work, lobbying events attended, and donations made and collected.
Identification Data:	including first name, last name, username or similar identifier, title and job title, age/date of birth, gender, biological sex, gender reassignment, legal status, documentation you may submit in order for us to verify your identity, such as your driving licence, passport, bank statements and / or qualification certificate, documentation relating to your right to work in the UK such as British or Irish passport or immigration papers, as well as other personal data and documentation you may submit for identity verification purposes.
Images:	including those found on driving licence and passports, photos and videos of students and their work, photos of our events, recordings of Teams meetings, and images recorded on any CCTV and vehicle dash cameras that we are responsible for.
Location Data:	such as applicable Local Authority, CCTV and dash cam footage, IT system access logs, address and telephone number inclusive of area codes.
Marketing and Fundraising Communications Data:	cookie information, preferences in receiving marketing information from us including information maintained on suppression lists in the event that consent to receipt of marketing information has been withdrawn.
Outcomes Information:	such as BERRI assessments, Boxall Profile assessments and health and dental assessments, placement outcomes, strengths and difficulties questionnaire scores, offending, adoptions, foster placements, observations from family contact and visitors, dates of key court orders and decisions.
Professional and Work Information:	current and previous employer names and contact details, qualifications, job title and role responsibility information, social media information, work address and any other professional and work-related information that might reasonably be included on a CV or within job application documentation, role and remit details.
Publicly Available Information	Includes information freely available on the internet and social media platforms such as LinkedIn.

References:	references from previous and current employers and other relevant references or in the case of residents and children in our care educational or other references related to those residents and/or children in care.
Relationship Data:	Information about family, carers, guardians and other relationships, historical details relating to biological family, foster or adoptive family and emergency contacts, parental responsibility, next of kin names and contact details, whether parents are in the services, whether parents are from a traveller family.
Research Information:	such as data relating to demographic information, education, ethnicity, health and social care.
Technical Information:	such as your IT system login data, operating system, browser type, device type, IP address, visits to our website, website preferences and interaction with the website, such as pages visited.
Recordings:	including video and voice recordings.
Transactional Information:	information about the services we provide and those we purchase, information about donations made to us.

8. Do we collect Sensitive Personal Information?

Yes, we do collect sensitive personal data including special categories of data, criminal records data and personal data about minors. This is due to the nature of the work we do caring for minors and safeguarding them whilst they are in our care.

The special categories of personal data we collect include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning health or data concerning sex life or sexual orientation.

These types of personal data are especially sensitive, and we provide additional specific protection to that information when we process it.

9. How we use this information

The Caldecott Foundation only collects and processes (i.e., uses) your personal information when and how the law allows us to do so: that is, when we are satisfied that we have a lawful basis for doing so. Most commonly we will use your personal information in the following circumstances:

- Where you have consented before the processing takes place.
- Where we need to perform a contract we are about to enter or have entered into.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

In the table below, you will find the legal bases that we rely on to process your personal data:

PERSONAL DATA PROCESSING PURPOSE	LEGAL BASIS FOR PROCESSING	CATEGORIES OF DATA
Providing our Services, to include supporting minors in our care and education, the provision of pastoral care, and monitoring progress of those accessing our Services	Contract Legitimate Interest Legal Obligation	Business Contact Information Business Role Information Caldecott Minors Information Care Information Care Leavers' Information Characteristics Contact Information Criminal & Background Information Educational Data Location Data Outcomes Information Relationships Data
Assessing the quality of our Services (and our service delivery) including to inform the making of changes and improvements to our	Legitimate Interest Legal Obligation	Caldecott Minors' Information Care Leavers' Information Communications Data

Services and service delivery.		Outcomes Information Research Information Transactional Information
Offering and providing access to relevant information about our Services	Contract Legitimate Interests Legal Obligation	Business Contact Details Contact Data Location Data Technical Information
Keeping appropriate internal records about our Services and support	Contract Legitimate Interests Legal Obligation	Business Contact Information Business Role Information Caldecott Minors' Information Care Leavers Information Communication Data Contact Data Criminal and Background Information Education Data Outcomes Data Relationships Data Transactional Information
Evaluating and improving our policies on children's social care	Legal Obligation Legitimate Interests	Caldecott Minors' Information Care Leavers' Information Communications Data Outcomes Information Research Information Transactional Information
Managing our relationships including with actual and	(a) Consent Contract	Contact Information

prospective Service users to include: a)Notifying you about changes to our Services; b)Notifying you about changes to our relevant policies and procedures including this Notice c)Asking you to leave a review or take a survey about our Services or in relation to our relationship with you.	Legal Obligation Legitimate Interest (b) Legal Obligation (c) Legitimate Interests Consent	Communications Data
Managing our stakeholder and third-party relationships	Contract Legal Obligation Legitimate Interest	Business Contact Details Business Role Information Publicly Available Information Transactional Information
Maintaining the security of our premises and the integrity of the use of our resources to offer and provide our Services, such as our business vehicles	Legitimate Interest	Behavioural Information Driving Information Images Recordings
Deploying resource and evaluating the suitability of staff, volunteers and other professionals working with minors in our care	Legal Obligation Legitimate Interest	Business Contract Details Business Role Information Caldecott Minors' Information Care Information Criminal and Background Information Professional and Work Information
Running recruitment processing and assessing candidates for employment	Legal Obligation	Candidate Information

and voluntary opportunities with us	Legitimate Interest	Contact Data Criminal and Background Information Identification Data Images Professional and Work Information References
Managing our existing donors and supporters	Consent Legitimate Interest	Donor Information Fundraising and Support Information Marketing and Fundraising Communications Data Publicly Available Information
Managing and running our marketing activities, including promoting and running relevant events.	Consent Legitimate Interest	Contact Data Fundraising and Support Information Marketing and Fundraising Communications Data Publicly Available Information
Managing payments, fees and charges and collecting and recovering money owed to us	Contract Legitimate Interest	Business Contact Information Transactional Information
Administering and protecting our business, IT network and our website(s) (including troubleshooting, data analysis, testing, system maintenance, system logs, support,	Legitimate Interest	Communications Data Technical Information

reporting and hosting of data)		
Delivering relevant website content and advertisements to you and measuring and / or understanding the effectiveness of the advertising we serve to you	Consent Legitimate Interest	Communications Data Marketing and Fundraising Communications Data Technical Information
Using data analytics to improve our website, products/services, marketing, customer relationships and experiences	Consent Legitimate Interest	Communications Data Technical Information

10. Withdrawing Consent

If we rely on your consent to process your personal information, which may be express or implied consent according to the applicable law, you have the right to withdraw consent at any time. You can withdraw your consent by contacting us at dataprotection@caldecottfoundation.co.uk . Please note that this will not affect the lawfulness of the processing which has taken place before you withdrew your consent nor, when applicable law allows, will it affect the processing of your personal information on the basis of any other lawful basis other than consent.

11. Sharing your personal information

Insofar as is reasonably necessary for us in delivering our Services to you and for the purposes set out in this Notice including for the purposes of carrying out recruitment processes, your personal information may be shared with the below parties that help us deliver our Services and manage our operations:

- other entities within the Caldecott Foundation group (the “Group”), including (but not limited to) Caldecott Fostering;
- our staff relevant to the provision of Services to you;
- systems administrators;
- third parties we use or work with to help deliver our Services to you;
- other third parties we use to help us administer our operations, such as marketing agencies and / or website hosts;
- safeguarding authorities;
- healthcare providers including but not limited to NHS vaccine and eyecare providers, opticians, dentists, your GP, Paediatricians, specialist NHS services, Child & Adolescent Mental Health Service (CAMHS) and registered therapists and psychologists;

- local authorities;
- hiring managers, HR, DBS service providers, psychometric testing providers and recruitment teams engaged in our recruitment processes.

We will only disclose your personal information outside the Group if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.

Specific circumstances in which your personal information may be disclosed to third parties outside of the Group include:

- where we consider disclosure is necessary or required by law, to exercise, establish, or defend our legal rights, or to protect your vital interests or those of any other person;
- where we are required to work in partnership with third parties such as NHS and healthcare providers, local authorities, and relevant departments within them such as social work, early help, safeguarding authorities, residential care providers, schools and / or other educational establishments in connection with our provision of Services to you;
- where we engage third party vendors to perform services on our behalf and these third parties must process personal information to provide their services. Examples include: (a) recruiting or executive search agencies involved in your recruitment; (b) background checking or other screening providers and relevant local criminal records checking agencies; (c) data storage, shared services and recruiting platform providers, (d) third parties who provide support and advice including in relation to legal, financial / audit, management consultancy, insurance, health and safety, security and intel and whistleblowing / reporting issues; and
- in connection with a proposed sale, reorganization, or disposal of The Caldecott Foundation or any of The Caldecott Foundation's business units.

We only allow third parties to process your personal information if we are satisfied that they take appropriate measures to protect that information. We also impose contractual obligations on them to ensure they can only use your personal data to provide support and services to us and to you.

We, or the third parties mentioned above, occasionally also share personal data with:

- our and their external auditors, e.g., in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations; and
- law enforcement agencies, courts, tribunals, safeguarding authorities, local authorities and regulatory bodies to comply with our legal and regulatory obligations.

We will never sell, lease, or trade your personal data for any reason.

The specific kind of information we share will depend on your activities with us and only to the extent as required or permitted by law, and/or with your consent.

Please note however that this Notice does not apply to the sharing of personal information by third party providers who may collect personal information from you and may share it with us. In these situations, we strongly advise you to review the applicable third-party provider's privacy notice before submitting your personal information.

12. International transfers

The Caldecott Foundation operates exclusively in the UK. However, in operating our Services we may take the decision to use Processors who are based outside the UK. The most common reason for this would be the use of a cloud-based software solution.

These Processors may be located in jurisdictions outside the UK where the level of protection of personal data might not be as strict and advanced as here.

In those cases, your personal data will only be transferred where appropriate safeguards are in place (such as a UK International Data Transfer Agreement) and the transfer is made in line with UK Data Protection Law. We will ensure that appropriate security arrangements are in place to protect your personal data prior to making any such transfer.

13. How long we retain your personal information

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In the case of candidates for employment opportunities with us (including voluntary positions), in cases where you are unsuccessful, your personal information will be kept for the duration of the application process plus a reasonable period of time after confirmation that your application was unsuccessful to allow us to record the reasons for our decision in relation to your application. We may also retain your personal information to consider you for other suitable openings within The Caldecott Foundation in the future.

If you would like to opt-out from The Caldecott Foundation's policy of retaining your personal information for the purposes of considering you for other suitable openings, please email dataprotection@caldecottfoundation.co.uk and we will securely destroy your personal data in accordance with our document retention policy and applicable laws and regulations.

14. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we do not have any control over what happens between your device and the boundary of our information infrastructure when you are engaging with us by electronic means. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

15. Changes to your personal information

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

16. Cookies and other tracking technologies

Each time you interact with our website, we may, depending on the consent provided and your jurisdiction, automatically collect personal information, including Technical Information which will include data about your device, your browsing actions and patterns, content and usage data. We collect this data using cookies, server logs and other similar technologies like pixels, tags and other identifiers in order to remember your preferences, to understand how our website is used, and to customise our marketing offerings.
Our full Cookie Policy can be found at https://www.thecaldecottfoundation.co.uk/cookie-policy/

17. Your rights

Depending on where you are located, you may have certain rights in relation to your personal information, for example:

Request access to your personal information:	You have the right to ask us for a copy of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information you ask for. Your right to ask for information in this way is known as making a data

	subject access request. In most cases, this will be free of charge; however, in some limited circumstances, for example repeated requests for further copies, we may apply an administration fee.
Request correction of the personal information that we hold about you:	You have the right to ask us to correct information we hold about you which you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
Request erasure of your personal information:	You have the right to ask us to delete personal information about you in certain circumstances. This right enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. We have the right to refuse to comply with a request for erasure if we are processing the personal information in question for certain specific reasons, including where we process the personal data in question in order to comply with a legal obligation, or to perform a task in the public interest.
Object to processing of your personal information:	You have the right to object to processing in certain circumstances, for example where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
Request the restriction of processing of your personal information:	You may ask us to stop processing your personal data in certain circumstances. Where this right applies, we will still hold your personal data but will not process it any further. You are able to ask us to suspend the processing of personal information about you in this way, for example if you want us to establish its accuracy or the reason for processing it.
Request the transfer of your personal information to another party:	This right only applies if we are processing information based on your consent or for the performance of a contract and the processing is automated.

The application of these and any other privacy rights you may have depends on applicable data protection law. If you would like more information about your specific rights under data protection law in your jurisdiction and how to exercise those rights, please contact us at dataprotection@caldecottfoundation.co.uk.

Please note, when exercising your rights as set out above, we may request specific information from you to help us confirm your identity, verify your rights, and respond to your request. Applicable law may allow or require us to deny your request, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices.

18. Complaints

If you have any concerns or would like to make a complaint about how your personal data is being processed by The Caldecott Foundation (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the relevant supervisory authority and The Caldecott Foundation's Data Protection Officer at dpoaas@grcsolutions.io however, we would encourage you to contact us in the first instance as we aim to promptly and efficiently try our best to deal with your concerns in a confidential manner. We have created an online data protection complaints form which you can use and can be found at https://www.thecaldecottfoundation.co.uk/data-protection-complaint-form/

The supervisory authority in the UK is the Information Commissioner's Office (ICO), which may be contacted at https://ico.org.uk/concerns or by telephone on 0303 123 1113.

This Privacy Notice was last updated in September 2026.