Pathways Privacy Policy

Protecting and respecting your privacy is important to us. We will endeavour to comply with General Data Protection Regulation (GDPR), the Data Protection Act (2019), and The DUAA (2025). Our policy below outlines what we do to keep your information safe.

Our contact details:

Name: Sarah and David Witt, Pathways
Website: www.sarahanddavewitt.co.uk/
Phone Number: 07739391359
E-mail: sarahanddavewitt@gmail.com

We are registered with the information commissioner's office (ICO).

The type of personal information we collect

I***f you purchase a programme/training session or make an enquiry:***

- Personal data that will enable us to contact you such as your name, address, email and phone number.

If you access an ongoing service (such as tuition or therapeutic support):

- Before or during your first session with us, you will be asked to provide additional personal information. Depending on the service you are accessing, this may include your DOB, emergency contact details, GP details and any relevant information you want us to be aware of (e.g. any accommodations you may need or medical information).
- Brief notes are made after therapeutic support sessions. These notes will be stored in a locked filling cabinet, our secure online cloud-based storage or stored securely in a password protected file within the Kiku system. All confidential information is held in accordance with the GDPR, 2018. For further information about the secure & encrypted Kiku system, please see their Privacy Policy: https://www.wearekiku.com/privacy-notices
- During and after tuition sessions, records of work completed (often in the form of photos/screenshots) will be stored on a secure online cloud-based storage.

The lawful basis for processing personal data

Pathways takes your privacy seriously. We have a legitimate interest in using the personal data we collect, as it is necessary for us to provide a service to our clients and customers. The information we collect about you is solely used to provide a service to you.

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing personal data is that clear consent is given by clients and customers for us to do so, so that we can provide a service.

We may also ask for your feedback on our service, for the purpose of our own service development and marketing research. We will never sell your information to others.

How we protect the security of your personal information

- Personal information (such as contact details) is only accessed by David and Sarah Witt.
- Any sensitive personal information is only accessed by your practitioner.
- Our electronic devices are password protected.
- Any handwritten notes taken during sessions are stored in a lockable filing cabinet.
- We will never use open or unsecure Wi-Fi networks to send any personal data
- In the event of online communication using video sessions or other forms of online support, we will discuss the available options to best suit your needs. Encrypted methods will be recommended and the need to use a secure network will be emphasised.
- Both you and your practitioner are forbidden from recording an appointment without permission from the other party. Similarly, neither the client nor practitioner should have a third party observing or overhearing an appointment without permission of the other party (other than in the case of tuition, in which parents/carers are always welcome to listen in). This applies to face-to-face and telephone or video call appointments.

Sharing your personal information

We hold information about you and the service you receive in confidence. This means that we will not normally share your personal information with anyone else.

However, there are exceptions to this when there may be a need to share your information with other parties:

- Therapeutic support: Regulatory bodies emphasise the importance of continuing professional development and supervision with a qualified and experienced supervisor. This requirement ensures best clinical practice and the maintenance of the highest standards of care. Supervision sessions are bound by confidentiality and clients will only be referred to by their first name.
- Tutoring: If consent is provided, a child's work may be shared on social media (with first name only or anonymously, depending upon their preference). This will only be done in a positive and encouraging manner.
- Tutoring: If parents/carers and children ask for details of the child's progress to be shared with other professionals, this can be agreed.
- There are rare occasions on which it may be necessary to break confidentiality. These include if we believe you or someone else are in danger of serious harm or abuse, if you share information about a proposed act of terrorism or other illegal activity or if the courts instruct us to provide information. We would endeavour to discuss any decision to break confidentiality with you prior to doing so.

How long we will store your personal information

We will only store your personal information for as long as it is required.

If you purchase a course from us, we will retain your email address. This is so we can contact you with any additional information about the course/programme. We would also like to be able to inform you of any future offers from Pathways; you can opt out of this at any point.

If you access therapeutic support, we will keep your records and personal data for 5 years after the end of your contact with our service. Once 5 years has lapsed, we will delete or shred and dispose of your notes at the end of each calendar year.

If you access tuition, we will usually keep your records and personal data for 1 year after the end of your contact with our service. This is in case you choose to return for further tuition during that time period; we can dispose of them sooner upon request. After 1 year (or sooner if requested), we will delete or shred and dispose of your notes at the end of each calendar year. The exception will be any details of work which have (with your consent) being posted on social media. These will be deleted upon request.

Your right to access the personal information we hold about you

You have a right to access the information we hold about you. We will usually share this with you within 30 days of receiving a request. You have a right to have your personal information corrected if it is inaccurate.

Data Protection Complaints

If you have a concern about how we handle your personal information, we want to hear from you.

How to raise a concern: You can contact us by email at sarahanddavewitt@gmail.com. Please describe your concern as clearly as you can, and include any relevant dates or details.

What happens next: I will acknowledge your complaint within 30 days of receiving it. I will then look into your concern and respond to you without undue delay.

If you remain dissatisfied: If you are not satisfied with my response, you have the right to make a complaint to the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.