



SENSES Learning Hub

GDPR POLICY

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Dawn Oughtibridge (Director)

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John Fox (Director)

A handwritten signature in grey ink, appearing to read "John Fox", with a long horizontal flourish extending to the right.



The General Data Protection Regulation (GDPR) ensures a balance between an individual's rights to privacy and the lawful processing of personal data undertaken by organisations in the course of their business. It aims to protect the rights of individuals about whom data is obtained, stored, processed or supplied and requires that organisations take appropriate security measures against unauthorised access alteration disclosure or destruction of personal data. SENSES Learning Hub will protect and maintain a balance between data protection rights in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), the Data (Use and Access) Act 2025 (DUAA) and other applicable data-protection legislation.

The Data (Use and Access) Act 2025 has introduced amendments to the UK data-protection framework. As at September 2026, the relevant data-protection provisions of the DUAA are in force and SENSES Learning Hub will ensure that its data-protection arrangements reflect current legislation and applicable ICO guidance.

SENSES Learning Hub recognises that it processes information relating to children and young people and will take particular care to ensure that children's personal information is processed fairly, lawfully, transparently and in a manner appropriate to their age and needs. The ICO's current guidance confirms that children require particular consideration when organisations process their personal information.

Personal data

Personal data is any information relating to an individual where the individual can be identified (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. This includes special category data and pseudonymised personal data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example a name, email address location or date of birth) or an opinion about that person's actions or behaviour. Personal data will be stored either electronically or as part of a structured manual filing system.

Personal data may include information relating to pupils, parents/carers, staff, applicants, visitors, contractors, suppliers and other individuals with whom SENSES Learning Hub has a relationship.

Special Category Data

Previously termed "Sensitive Personal Data", Special Category Data is similar by definition and refers to data concerning an individual Data Subject's racial or ethnic origin, political or religious beliefs, trade union membership, physical and mental health sexuality, biometric or genetic data and personal data relating to criminal offences and convictions.



Special category data includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data where used for identification, health data, and data concerning a person's sex life or sexual orientation.

Personal data relating to criminal convictions and offences is subject to separate additional safeguards under Article 10 UK GDPR and the Data Protection Act 2018 and is not itself classified as “special category data”. SENSES Learning Hub will ensure that an appropriate legal condition is identified before processing such information.

Data Subject

An individual about whom such information is stored is known as the Data Subject. It includes but is not limited to employees.

This includes pupils, parents/carers, employees, applicants, volunteers, contractors and other identifiable individuals whose personal information is processed by SENSES Learning Hub.

Data Controller

The organisation storing and controlling such information (i.e. SENSES Learning Hub) is referred to as the Data Controller.

SENSES Learning Hub will determine, where applicable, whether it is acting as a data controller, joint controller or data processor in relation to particular processing activities. Where SENSES Learning Hub acts as a processor on behalf of another organisation, it will comply with the relevant contractual and UK GDPR requirements applicable to processors.

Processing

Processing data involves any activity that involves the use of personal data. This includes but is not limited to obtaining recording or holding data or carrying out any operation or set of operations on that data such as organisation amending, retrieving, using disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties.

Processing also includes collecting, organising, structuring, storing, adapting, retrieving, consulting, using, combining, restricting, erasing and destroying personal data.

Automated Processing

Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to an individual in particular to analyse or predict



aspects concerning that individual's performance at work, economic situation, health personal preferences interests reliability behaviour location or movements.

An example of automated processing includes profiling and automated decision making. Automatic decision making is when a decision is made which is based solely on automated processing which produces legal effects or significantly affects an individual.

Automatic decision making is prohibited except in exceptional circumstances unless permitted under DUAA safeguards.

SENSES Learning Hub will not make decisions based solely on automated processing where those decisions produce legal effects or similarly significant effects on an individual unless the processing is permitted by law and the appropriate safeguards have been implemented.

Where automated decision-making or profiling is proposed, SENSES Learning Hub will consider the relevant UK GDPR and DUAA requirements, including the need for appropriate safeguards, transparency and human involvement where required. Particular care will be taken where children are involved.

Criminal Records Information

This refers to personal information relating to criminal convictions and offences, allegations proceedings and related security measures.

Information relating to criminal convictions and offences will only be processed where an appropriate legal basis and additional legal condition exist and where appropriate safeguards are in place.

When can SENSES Learning Hub Use Personal Data

Data Protection Principles

SENSES Learning Hub must adhere to:

- Personal data must be processed lawfully fairly and in a transparent manner;
- Personal data must be collected only for specified explicit and legitimate purposes;
- Personal data must be adequate relevant and limited to what is necessary in relation to the purposes for which it is processed;
- Personal data must be accurate and where necessary kept up to date;
- Personal data must not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed;

- Personal data must be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage;
- SENSES Learning Hub must be able to demonstrate compliance with these principles through appropriate technical and organisational measures.

The UK GDPR's accountability principle requires organisations not only to comply with the data-protection principles but also to demonstrate compliance.

Personal Data

SENSES Learning Hub may only process a data subject's personal data if one of the following fair processing conditions are met:

- The data subject has given their consent;
- The processing is necessary for the performance of a contract with the data subject or for taking steps at their request to enter into a contract;
- To protect the data subject's vital interests;
- To meet our legal compliance obligations (other than a contractual obligation);
- To perform a task in the public interest or in order to carry out official functions as authorised by law;
- The processing is necessary for the purposes of SENSES Learning Hub's legitimate interests, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject. Where legitimate interests are relied upon, SENSES Learning Hub will undertake and document an appropriate assessment where required.

SENSES Learning Hub will identify and document the appropriate lawful basis for each processing activity. Consent will not be used where another lawful basis is more appropriate.

Special Category Data

SENSES Learning Hub may only process special category data if they are entitled to process personal data (using one of the fair processing conditions above) and one of the following conditions are met:-

- The data subject has given their explicit consent;
- The processing is necessary for the purposes of exercising or performing any right or obligation which is conferred or imposed on the organisation in the field of employment law, social security law or social protection law. This may include, but is not limited to, dealing with sickness absence, dealing with disability and making adjustments for the same, arranging private health care insurance and providing contractual sick pay;
- To protect the data subject's vital interests;
- To meet our legal compliance obligations (other than a contractual obligation);

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- Where the data has been made public by the data subject;
 - To perform a task in the substantial public interest or in order to carry out official functions as authorised by law;
 - Where it is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services;
 - Where it is necessary for reasons of public interest in the area of public health;
 - The processing is necessary for archiving, statistical or research purposes. Where this condition is relied upon, SENSES Learning Hub will ensure that any applicable safeguards and legal requirements are satisfied.

SENSES Learning Hub will identify both an Article 6 lawful basis and an appropriate Article 9 condition before processing special category data.

Consent

Where SENSES Learning Hub relies on consent as a fair condition for processing (as set out above), it will adhere to the requirements set out in the UK GDPR and applicable DUAA provisions.

Consent must be freely given, specific, informed and be an unambiguous indication of the data subject's wishes by which they signify agreement to the processing of personal data relating to them. Explicit consent requires a very clear and specific statement to be relied upon (i.e. more than just mere action is required).

A data subject will have consented to processing of their personal data if they indicate agreement clearly either by a statement or positive action to the processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity will not amount to valid consent.

Data subjects must be easily able to withdraw consent to processing at any time and withdrawal must be promptly honoured.

Where consent is withdrawn, SENSES Learning Hub will stop processing based on consent unless another lawful basis permits the processing to continue. Withdrawal of consent does not invalidate processing that took place lawfully before consent was withdrawn.

Where children are involved, SENSES Learning Hub will consider the child's age, maturity and understanding and will provide privacy information in a clear and accessible form appropriate to the child.

Personal data must be collected only for specified, explicit and legitimate purposes



Personal data will not be processed in any manner that is incompatible with the legitimate purposes.

SENSES Learning Hub will not use personal data for new, different or incompatible purposes from that disclosed when it was first obtained unless we have informed the data subject of the new purpose (and they have consented where necessary).

Where personal information is to be reused for a new purpose, SENSES Learning Hub will consider whether that purpose is compatible with the original purpose and whether a new lawful basis, updated privacy information or other safeguards are required.

Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed

SENSES Learning Hub will only process personal data when our obligations and duties require us to. We will not collect excessive data and ensure any personal data collected is adequate and relevant for the intended purposes.

When personal data is no longer needed for specified purposes, the information will be deleted.

Where information must be retained to satisfy a legal, contractual, safeguarding, regulatory or other legitimate requirement, it will be retained in accordance with the applicable retention period rather than deleted simply because it is no longer actively used.

Personal data must be accurate and, where necessary, kept up to date

SENSES Learning Hub will endeavour to correct or delete any inaccurate data being processed by checking the accuracy of the personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out of date personal data.

Data subjects also have an obligation to ensure that their data is accurate, complete, up to date and relevant. Data subjects have the right to request rectification to incomplete or inaccurate data held.

Where inaccurate personal data has been disclosed to another organisation, SENSES Learning Hub will consider whether the recipient should also be informed of the correction.

Personal data must not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed



Legitimate purposes for which the data is being processed may include satisfying legal, accounting or reporting requirements. SENSES Learning Hub will ensure that they adhere to legal timeframes for retaining data.

We will take reasonable steps to destroy or erase from our systems all personal data that we no longer require. We will also ensure that data subjects are informed of the period for which data is stored and how that period is determined in our privacy notices.

Personal data must be processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage

In order to assure the protection of all data being processed, SENSES Learning Hub will develop, implement and maintain reasonable safeguard and security measures.

Security measures will be proportionate to the nature and sensitivity of the information and the risks associated with its processing. Measures may include access controls, strong passwords, multi-factor authentication where appropriate, encryption, secure backups, device security, restricted access, secure disposal and staff training.

SENSES Learning Hub will apply data protection by design and by default when introducing new systems, processes or technologies involving personal information.

Sharing Personal Data

SENSES Learning Hub will generally not share personal data with third parties unless certain safeguards and contractual arrangements have been put in place. These include if the third party:-

- Has a need to know the information for the purposes of providing the contracted services;
- Sharing the personal data complies with the privacy notice that has been provided to the data subject and, if required, the data subject's consent has been obtained;
- The third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- The transfer complies with any applicable cross border transfer restrictions; and where required under UK GDPR and DUAA transfer conditions;
- A fully executed written contract that contains appropriate UK GDPR-compliant data protection clauses has been obtained.
- There may be circumstances where data is required either by law or in the best interests of our pupils, parents or staff to be passed onto external authorities, for example, the local authority, Ofsted or other relevant statutory bodies or safeguarding agencies. These authorities will be expected to process information in accordance with applicable data-protection legislation.



Personal data may be shared without consent where there is another lawful basis for doing so, including where sharing is necessary to comply with a legal obligation or to protect a person's vital interests. Consent should not be treated as a prerequisite for safeguarding information sharing where another lawful basis applies.

Transfer of Data Outside the European Economic Area (EEA)

The GDPR restricts data transfers to countries outside the EEA in order to ensure that the level of data protection afforded to individuals by the GDPR is not undermined.

SENSES Learning Hub will not transfer data to another country outside of the EEA without appropriate safeguards being in place and in compliance with the UK GDPR, DPA 2018 and applicable DUAA requirements.

The UK GDPR's international transfer rules apply to transfers of personal data outside the UK. Where a restricted transfer takes place, SENSES Learning Hub will ensure that an appropriate transfer mechanism and safeguards are in place, such as an adequacy decision or appropriate safeguards where required.

Where an international transfer is made using appropriate safeguards, SENSES Learning Hub will complete any assessment or supplementary measures required by current ICO guidance.

Subject Access Requests

A Data Subject has the right to be informed by SENSES Learning Hub of the following:-

- Confirmation that their data is being processed;
- Access to their personal data;
- A description of the information that is being processed;
- The purpose for which the information is being processed;
- The recipients/class of recipients to whom that information is or may be disclosed;
- Details of the sources of information obtained;
- Other supplementary information required under the right of access.

In relation to any Personal Data processed for the purposes of evaluating matters in relation to the Data Subject that has constituted or is likely to constitute the sole basis for any decision significantly affecting him or her, to be informed of the logic of the Data Controller's decision making. Such data may include, but is not limited to, performance at work, creditworthiness, reliability and conduct.

Other supplementary information



Any Data Subject who wishes to obtain the above information must notify SENSES Learning Hub in writing of his or her request. This is known as a Data Subject Access Request.

The request should in the first instance be sent to the directors.

A subject access request may be made verbally or in writing and does not need to use specific wording or refer to the UK GDPR. Any request that may constitute a subject access request should be passed promptly to the person responsible for data protection at SENSES Learning Hub.

SENSES Learning Hub will normally respond to a valid subject access request without undue delay and within one month of receipt. This period may be extended by up to a further two months where permitted by law, including where a request is complex or multiple requests have been received.

SENSES Learning Hub will verify the identity of the requester where reasonably necessary and will ensure that information is disclosed securely.

Employee Obligations

Employees may have access to the personal data of other members of staff, suppliers, parents or pupils of SENSES Learning Hub in the course of their employment or engagement. If so, SENSES Learning Hub expects those employees to help meet the data protection obligations to those individuals. Specifically, you must:-

- Only access the personal data that you have authority to access, and only for authorised purposes;
- Only allow others to access personal data if they have appropriate authorisation;
- Keep personal data secure (for example by complying with rules on access to school premises, computer access, password protection and secure file storage and destruction.
- Not to remove personal data or devices containing personal data from the premises unless appropriate security measures are in place (such as encryption, pseudonymisation or password protection) to secure the information;
- Not to store personal information on local drives.
- Not share passwords or allow another person to use an account assigned to you.
- Report suspected or actual personal-data breaches immediately to the Directors or the person responsible for data protection.
- Complete any data-protection training required by SENSES Learning Hub.
- Only use approved systems, devices and services for storing or transmitting SENSES Learning Hub personal data.

Accountability



SENSES Learning Hub will ensure compliance with data protection principles by implementing appropriate technical and organisational measures. We are responsible for and demonstrate accountability with the UK GDPR, DPA 2018 and DUAA principles.

SENSES Learning Hub have taken the following steps to ensure and document GDPR compliance:-

- If you are unsure of the lawful basis being relied on to process personal data;
- If you need to rely on consent as a fair reason for processing (please see below the section on consent for further detail);
- If you need to draft privacy notices or fair processing notices;
- If you are unsure about the retention periods for the personal data being processed;
- If you are unsure about what security measures need to be put in place to protect personal data;
- If there has been a personal data breach;
- If you are unsure on what basis to transfer personal data outside the UK;
- If you need any assistance dealing with any rights invoked by a data subject;
- Whenever you are engaging in a significant new (or a change in) processing activity which is likely to require a data protection impact assessment or if you plan to use personal data for purposes other than what it was collected for;
- If you plan to undertake any activities involving automated processing or automated decision making, especially under UK GDPR and DUAA provisions;
- If you need help complying with applicable law when carrying out direct marketing activities;
- If you need help with any contracts or other areas in relation to sharing personal data with third parties.
- If you are unsure whether a Data Protection Impact Assessment (DPIA) is required.
- If a new technology, software system, monitoring system or significant change to processing is being considered.
- If personal data relating to children is being used in a new or substantially different way.

Where a DPIA is required, it will be completed before the processing begins wherever practicable.

SENSES Learning Hub will maintain appropriate records to demonstrate compliance, including records of processing activities where legally required, privacy information, data-sharing arrangements, retention arrangements, data breaches and relevant DPIAs.

Personal Data Breaches

The GDPR requires SENSES Learning Hub to notify any applicable personal data breach to the Information Commissioner's Office (ICO) where the breach is likely to result in a risk to the rights and freedoms of individuals. Where notification is required, it will normally be made without undue delay and, where feasible, within 72 hours of becoming aware of the breach.



Where a personal data breach is likely to result in a high risk to the rights and freedoms of individuals, SENSES Learning Hub will also consider whether affected individuals must be informed without undue delay.

All personal-data breaches will be recorded, including breaches that do not require notification to the ICO. SENSES Learning Hub will investigate breaches, take reasonable steps to contain and remedy them, and review whether additional safeguards are required.

Employees must report suspected personal-data breaches immediately and must not delay reporting while attempting to establish whether a breach is legally reportable.

Record Keeping

SENSES Learning Hub are required to keep full and accurate records of our data processing activities. These records include:-

- The name and contact details of the provision;
- The name and contact details of the Data Protection Officer, where one is appointed, or the person responsible for data protection matters;
- Descriptions of the types of personal data used;
- Description of the data subjects;
- Details of the provisions processing activities and purposes;
- Details of any third party recipients of the personal data;
- Where personal data is stored;
- Retention periods; and
- Security measures in place.
- Details of international transfers of personal data, where applicable;
- Records of relevant lawful bases and special category conditions;
- Records of personal-data breaches and actions taken;
- Records of DPIAs where applicable;
- Records of relevant data-sharing arrangements and processor contracts.

SENSES Learning Hub will determine whether it is legally required to appoint a Data Protection Officer (DPO). Where a DPO is required, the DPO will be appropriately involved in data-protection matters and will operate with the independence and resources required by law. Where a formal DPO is not legally required, SENSES Learning Hub will nevertheless ensure that an appropriately responsible person or function is identified for data-protection compliance.

Training

SENSES Learning Hub will ensure all relevant personnel have undergone adequate training to enable them to comply with data privacy laws.

Data-protection training will be provided at induction and refreshed periodically, and additional training will be provided where there are significant changes to legislation, systems, procedures or the individual's responsibilities.

Training will include, where relevant:

- The UK GDPR, DPA 2018 and DUAA;
- Confidentiality and secure handling of pupil, parent/carers and staff information;
- Phishing, scams and other information-security risks;
- Password and device security;
- Recognising and reporting personal-data breaches;
- Subject access requests and other individual rights;
- Appropriate information sharing and safeguarding information sharing;
- The additional care required when processing children's personal information.

Staff will be expected to maintain confidentiality during and after their employment or engagement with SENSES Learning Hub.

Review Log

Review date	Completed by who
18.08.25	John Fox and Dawn Oughtibridge
17.08.26	John Fox and Dawn Oughtibridge