



SENSES Learning Hub

GDPR POLICY

Dawn Oughtibridge & John Fox (Directors)

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Dawn Oughtibridge (Director)

A handwritten signature in black ink, appearing to read "Dawn", written in a cursive style.

John Fox (Director)

A handwritten signature in black ink, appearing to read "John Fox", written in a cursive style.



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 GDPR and the Data (Use and Access) Act 2025 (DUAA).

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.

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.

Data Subject

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

Data Controller

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

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.

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

Criminal Records Information

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

WHEN CAN SENSES LEARNING HUB PROCESS 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

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;

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 School 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);
- 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. SENSES Learning Hub identifies and documents the legal grounds being relied upon for each processing activity in line with DUAA research provisions.

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 GDPR.

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.

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

Personal data will not be processed in any matter 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).



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.

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.

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.

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:

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- 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 DUAA transfer conditions;
- A fully executed written contract that contains GDPR approved third party 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 the department of health. These authorities are up to date with data protection law and have their own policies relating to the protection of any data that they receive or collect.

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 GDPR and UK GDPR transfer tests as structured under DUAA.

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;

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.

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 Pseudonymisation, encryption, password protection) to secure the information;
- Not to store personal information on local drives.

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 GDPR 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 EEA;
- 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 new 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.

Personal Data Breaches

The GDPR requires SENSES Learning Hub to notify any applicable personal data breach to the Information Commissioner's Office (ICO) or successor body as established by DUAA.

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;
- 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.

Training

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

Review Log

Review date	Completed by who
18.08.25	John Fox and Dawn Oughtibridge

