

Data Protection & Privacy Policy

Policy Administration & Control

Policy Version	Effective Date	Review Date	Lead Authority
1.0	 Date	 Date	Board of Trustees / DSL

1. Introduction

This document establishes the formal Data Protection and Privacy Policy for SENbetweeners Hub UK. We are committed to protecting the rights and privacy of all users, specifically children and young people with Special Educational Needs and Disabilities (SEND) or Social, Emotional, and Mental Health (SEMH) challenges. This policy ensures strict adherence to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Statutory Compliance

This policy is maintained in accordance with the following regulatory frameworks:

- UK GDPR and the Data Protection Act 2018.
- The Children Act 2023.
- Keeping Children Safe in Education (KCSIE 2025).
- Online Safety Act 2023.

3. Data Protection Principles

We process all personal data according to the core principles of UK GDPR:

- **Lawfulness, Fairness, and Transparency:** Data is processed legally and transparently.

- **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes only.
- **Data Minimisation:** We collect only the data necessary for the intended purpose.
- **Accuracy:** We take reasonable steps to ensure personal data is accurate and kept up to date.
- **Storage Limitation:** Data is kept in a form which permits identification for no longer than is necessary.
- **Integrity and Confidentiality:** We use appropriate technical and organisational measures to ensure high-level encryption and security.

4. Information We Collect

We collect and receive information through various means to provide our services:

- **Registration Information:** Including names, email addresses, physical addresses, and dates of birth.
- **SEND/SEMH Data:** Information regarding undiagnosed, hidden, or emerging needs to provide appropriate support.
- **Technical Data:** Including IP addresses, device identifiers, and usage logs for digital safeguarding purposes.
- **Safeguarding Records:** Confidential logs of concerns, disclosures, and referrals, stored securely.

5. Lawful Bases for Processing

We rely on the following lawful bases to process personal data:

- **Contract:** To fulfill our membership and service obligations.
- **Legal Obligation:** To meet statutory requirements, particularly regarding safeguarding and financial reporting.
- **Legitimate Interests:** To improve our services, manage digital boundaries, and ensure community safety.
- **Consent:** Where explicit permission has been provided, such as for marketing or accessing certain device-level features.

6. Data Subject Rights

Under UK law, individuals (and "Responsible Adults" on behalf of children under 18) have specific rights regarding their data:

- **Right of Access:** The right to request a copy of the personal data we hold.
- **Right of Rectification:** The right to correct inaccurate or incomplete data.
- **Right of Erasure:** The right to request data deletion in certain circumstances.
- **Right to Restrict Processing:** The right to "block" or suppress processing of personal data.
- **Right to Object:** The right to object to processing based on legitimate interests or direct marketing.

7. Information Sharing & Disclosure

Our guiding principle is: "Share what you need to, with those who need to know".

- **Safeguarding Exceptions:** We share information without consent if there is a legal duty or a need to protect a child from significant harm.
- **Third-Party Partners:** Data may be shared with statutory services (e.g., MASH) or vetted partners (e.g., data analysis for member surveys) under strict confidentiality agreements.
- **No Commercial Sale:** We do not sell personal data to third parties for commercial gain.

8. Retention & Security

- **Security:** We utilize high-level encryption for family and student records. Physical and digital data are stored in secure environments with restricted access.
- **Retention:** Data is retained only as long as necessary for the purpose it was collected. For example, survey data is retained for 3 years, while safeguarding records are kept according to statutory limitation periods.

9. Contact Information & Complaints

For any queries regarding this policy or to exercise your data rights, please contact the lead authority.

Contact Role	Name	Details
Designated Safeguarding Lead	Person	Person
Data Protection Support	SENbetweeners Hub UK	Place
Regulatory Body	Information Commissioner's Office	ico.org.uk