

GDPR Policy & Privacy Notice

Updated 15th October 2025

This policy outlines how we process personal information and is arranged under the following headings:

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Contact details

Email office@sendeducationpartners.co.uk

What Information we Collect and Use, and Why

We collect or use the following information **for student education and welfare**:

- Names and contact details for students/children
- Names and contact details for parents, guardians, carers
- Gender
- Pronoun preferences
- Date of birth
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Welfare information (includes family and home life circumstances and history)
- Details of any criminal convictions
- Photographs
- Attendance and reason for absence data
- Progress reports
- Information relating to compliments and complaints
- Exclusion, suspension and behavioural information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Purchase or service history
- Witness statements and contact details
- Relevant information from previous investigations
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)

We collect or use the following information **for information updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Photographs
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following information **for recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg DBS, Access NI or Disclosure Scotland checks)
- Security clearance details (eg basic checks and higher security clearance)

We collect or use the following information **to comply with legal requirements**:

- Identification documents
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Safeguarding information
- Any other personal information required to comply with legal obligations

Lawful Bases and Data Protection Rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our Lawful Bases for the Collection and Use of your Data

Our lawful bases for collecting or using personal information **for student education and welfare** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Business growth
 - We collect data on potential clients that is already in the public domain and use this to offer our services to them
 - Our clients include schools, colleges and MATs.
 - We may need to collect data about students in order to inform and advise these clients on how to best meet the students needs, including but not limited to: (1) targeted interventions to support the student, (2) informing the client's approach to general inclusive practice (Quality First Teaching, QFT).
 - If recruiting sub-contractors, we will need to collect data on subcontractors in line with safer recruitment requirements.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests - collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task - we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information **for information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Business growth
 - We collect data on potential clients that is already in the public domain and use this to offer our services to them.

Our lawful bases for collecting or using personal information **for recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Public task - we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Public task - we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where We Get Personal Information From

- Parents or carers
- Local Authorities or Local Councils
- Social Services
- Other education establishments
- Health care providers
- Our clients – including schools, colleges, Multi-Academy Trusts (MATs) and Local Authorities (LAs). They share students' information with us so that we can provide effective support and advice. This information is limited to that which is strictly necessary for us to fulfil our contractual obligation.

How Long We Keep Information

For information on how long we keep personal information, see our retention schedule at

www.sendeducationpartners.co.uk/data-retention

Who We Share Information With

We share information with our clients that is relevant to the work we are undertaking for them. This is limited to data that originates from the scope of the work we are undertaking for our clients.

We are usually the **controller**, in which case we have determined the purposes, means and methods of processing the data.

In some circumstances, we may be the **processor** - processing data on behalf of our client, who has determined the purposes, means and methods of processing the data.

The Information Commissioner's Office offers more information about data controllers and processors here:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/controllers-and-processors/>

We may also share information with subcontractors to allow them to undertake work on our behalf.

Subcontractors may include:

- Educational Specialists
- Accountants
- Business Administrative Support Services
(eg for invoicing, creating proposals, workflows, infographics)

In all cases, shared information is limited to that which is strictly necessary.

Others we may share personal information with include:

- Parents and carers
- Local authorities
- Social services
- Fostering agencies
- Pupil Referral Units (PRU's) or Education Otherwise at School Centres (EOTAS)
- Specialist teachers such as peripatetic workers or speech and language therapists
- Organisations we need to share information with for safeguarding reasons
- Emergency services

How to Complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this GDPR Policy & Privacy Notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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