

THE HUB EDUCATIONAL SERVICES CIC

Data Protection Policy

In accordance with the UK GDPR and Data Protection Act (DPA) 2018

Written by: Vanessa Brooks

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Policy Brief and Purpose

The Hub Educational Services CIC is committed to protecting the personal information of all employees, pupils, parents, carers, commissioners, partner organisations and any other individuals whose data we process. This policy brings together the legal, procedural and ethical requirements of data protection into one comprehensive document. It serves both as an operational guide for staff and as evidence of compliance for statutory inspections or external audits, including those undertaken by commissioners or regulatory bodies.

Our Data Protection Officer (DPO) is Vanessa Brooks. The Hub adheres fully to the requirements of the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Digital Economy Act, the Freedom of Information Act 2000, the Environmental Information Regulations 2004, the Human Rights Act 1998, and relevant commercial data contracts and statistical legislation such as the Statistics and Registration Services Act. As an alternative provision, tuition and SEND support organisation, we take data protection extremely seriously. We seek explicit permission before sharing or using images or sensitive data, except where safeguarding concerns require information to be shared without consent in order to protect a child from harm. The Hub is registered with the Information Commissioner's Office (ICO) and maintains an active registration as evidence of our commitment to compliance.

This policy outlines our commitment to treating all personal information with the utmost care, confidentiality and respect. It ensures that data is handled

appropriately, lawfully and securely, and that all staff understand their responsibilities under data protection legislation.

The Seven Golden Rules for Sharing Information

The Hub follows the nationally recognised Seven Golden Rules for Safe Information Sharing in Safeguarding. These principles ensure that information is shared responsibly, lawfully and in the best interests of children and vulnerable individuals.

We recognise that data protection laws are not a barrier to sharing information when safety is at stake. Staff must be open and transparent with individuals about what data is collected, why it is collected, and how it may be shared. When staff are unsure about sharing information, they must seek advice from their manager, the safeguarding lead or the DPO. Consent should be sought whenever possible, but staff must remember that information can be shared without consent when there is a real risk of harm. Decisions about sharing information must balance safety and privacy, considering the consequences of sharing or not sharing. Information should be shared only when necessary, in a timely manner, and securely. All information-sharing decisions must be documented, including what was shared, with whom, why, how and when, in accordance with our safeguarding and data handling procedures.

Privacy Statement and Contact Details

The Hub Educational Services CIC operates across two sites: 148 Loughborough Road, Hathern, LE12 5JB, and Brooklyn House, Brook Street, Shepshed, LE12 9RG. We can be contacted by telephone on 07595 757197 or by email at vanessa@thehub-cic.co.uk.

Information We Collect, Use and Why

The Hub collects and processes a wide range of personal information to support education, welfare, safeguarding, operational management, legal compliance and organisational development. This includes names, contact details, gender, pronoun preferences, dates of birth, dietary requirements, payment details, SEND information, welfare information, criminal conviction details, photographs, biometric data, attendance information, account access information, exam results, qualifications, progress reports, compliments and complaints, exclusion and behavioural information, and health information.

For disciplinary investigations or crime prevention, we collect names, contact details, SEND information, attendance data, witness statements, records, reports, and video recordings from public and student access areas. For dealing with queries, complaints or claims, we collect names, contact details, addresses, video recordings, dashcam footage, witness statements, financial information, health and safety information, and SEND information. For marketing or information updates, we collect names, contact details, marketing preferences and consent records. For archiving, we collect names, contact details and addresses. For recruitment, we collect contact details, dates of birth, National Insurance numbers, identification documents, employment history, education history, right-to-work information and criminal

conviction details. For legal compliance, we collect identification documents, health and safety information and criminal offence data.

Lawful Bases and Data Protection Rights

Under UK GDPR, we must have a lawful basis for collecting and using personal information. These include consent, contract, legal obligation and public task. The lawful basis used determines which data protection rights apply. Individuals have rights including access, rectification, erasure, restriction, objection, portability, withdrawal of consent and the right to complain to the ICO. Requests must be responded to within one month.

Sources of Personal Information

We obtain personal information directly from individuals, parents, carers, schools, local authorities, social services, other education establishments, healthcare providers, professional consultants and government websites.

Data Sharing

We share information with parents, carers, local authorities, social services, PRUs, EOTAS centres, specialist teachers, examination boards, safeguarding organisations, emergency services, regulatory authorities, auditors, inspectors and organisations we are legally obliged to share information with. Some information may be shared publicly on our website or social media when consent has been provided.

Complaints

Concerns about data use should be raised with The Hub using the contact details provided. If concerns remain unresolved, individuals may contact the ICO at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, or via their helpline or website.

Types of Personal Information We Collect

We collect personal identifiers, financial information, educational data, SEND information, parental contact details, staff documentation and employee data.

Individual Rights

Individuals have rights to be informed, access their data, request rectification, request erasure, restrict processing, request portability, object to processing, challenge automated decision-making, withdraw consent and complain to the ICO.

How We Obtain and Use Personal Information

Most personal information is provided directly by individuals to support our work with children and young people, assist with remuneration claims and ensure staff meet qualifying criteria. We also receive information from schools, local authorities, parents, alternative provisions and external specialists. We use this information to devise suitable packages for learners, communicate with organisations, share

information with commissioners and liaise with third parties. Information may be shared with schools, parents, local authorities, social services, police and other supporting services.

Scope and Coverage

This policy applies to all employees, job candidates, customers, clients, suppliers, contractors, consultants, partners and any external entity acting on our behalf who may require access to data.

CCTV

CCTV operates across all Hub buildings and is stored on an external cloud-based system. It is used for staff and pupil safety. External agencies may access footage when an incident requires reporting, without additional parental consent.

Policy Elements

The Hub collects information transparently and with full cooperation from individuals. Data must be accurate, up-to-date, collected fairly, processed lawfully and protected against unauthorised access. Data must not be communicated informally, stored longer than necessary, transferred to organisations without adequate protection or shared beyond agreed parties except where required by law.

We must inform individuals about what data is collected, how it is processed, who has access, and what provisions exist for lost or compromised data. Individuals may request modification, erasure or correction of their data.

Actions and Commitments

The Hub restricts and monitors access to sensitive data, develops transparent collection procedures, trains employees in privacy and security, establishes breach reporting procedures, includes data handling clauses in contracts and maintains strong data protection practices such as shredding, secure locks, encryption, backups and access controls.

Parents and learners may request access to their data. Requests are directed to the DPO and responded to within 28 days. Children under 16 typically request through a parent or carer, while those over 14 may request jointly.

Disciplinary Consequences

Breaches of this policy may result in disciplinary action and potentially legal consequences.

Data Retention

Retention schedules apply to employee data, recruitment information, payroll records, pensions, training records, grievances, disciplinary records, operational

records and customer data. These schedules ensure compliance with legal, financial and regulatory requirements.