



Privacy Notice

Date of Review Reviewed By Date of Next Review	January 2025 Kath Barclay January 2026
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This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Post:

Bridge The Gap Malvern Ltd, 7 Edith Walk, Malvern, WR14 4QH

Telephone: 01684 353588

Email: enquiries@btgm.co.uk

What information we collect, 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 carers
- Gender
- Pronoun preferences
- Date of birth
- Dietary requirements (including vegetarian, vegan, gluten free and halal requirements)
- 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
- Exam results and qualifications
- Progress reports
- Information relating to compliments and complaints
- Exclusion, suspension and behavioural information

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

- Health information
- Sex life information
- Sexual orientation information

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

- Names and contact details
- Address
- 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)
- Correspondence
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data

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

- Racial or ethnic origin
- Trade union membership
- Health information

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

- Names and contact details
- Addresses
- Photographs



- Website and app user journey information
- Alumni records

We also collect or use the following information **for archiving purposes**:

- Racial or ethnic origin
- Trade union membership
- Health information

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

- Health information

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

- Identification documents
- Health and safety information
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

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 in brief set out 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. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **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. [You can read more about this right here.](#)
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

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:
 - The information we collect is in relation to student's education and welfare. This information may include information about a student's family situation. This information allows us to make informed choices about the appropriate needs of the student and informs our decision making on providing a bespoke programme for the student to enable them to reach their full potential. This also includes keeping them safe.
 - 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.

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.
- 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:
 - Collecting information such as contact details, age, addresses etc allows us to communicate effectively with stakeholders.
 - 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.

Our lawful bases for collecting or using personal information **for archiving 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.
- 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.

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

- Consent - Where we have obtained your explicit consent to process your personal information, such as when you voluntarily provide information as part of an application or recruitment process.
- Contractual Obligation - When processing your personal data is necessary to take steps at your request prior to entering into an employment or service contract, or to fulfil the terms of an existing contract.
- Legal Obligation - Where processing is necessary for compliance with a legal obligation, such as verifying an applicant's right to work or conducting required background checks.
- Legitimate Interests - When the processing is necessary for our legitimate interests, such as assessing qualifications, experience, and suitability for a position, provided such interests are not overridden by your rights and freedoms.
- Public task - processing may be carried out in the public interest, particularly when the recruitment relates to fulfilling educational responsibilities or statutory functions.
- Special Category Data Processing - When it is necessary to process sensitive data (e.g., health, ethnicity, or criminal background information) under specific conditions, such as compliance with legal requirements or safeguarding policies.

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.
- 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:
 - We collect personal information to update and inform students' Educational Health & Care Plan (EHCP) which is to be reviewed at least every 12 months by law.
 - 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.

Where we get personal information from

- Parents or carers
- Local authorities or local councils
- Social services
- Other education establishments
- Health care providers
- Professional consultants
- Children themselves.



How long we keep information

Please refer to our Data Retention Policy and Retention Schedule for more information on this. This is available on our website too.

Who we share information with

Data processors

SafeHr - Human Resources

This data processor does the following activities for us: They store our personnel records.

ICT4

This data processor does the following activities for us: They manage our IT and filtering systems.

Others we share personal information with

- Parents and carers
- Local authorities
- Social services
- Specialist teachers such as peripatetic workers or speech and language therapists
- School governing bodies (such as Board of governors or Parent/teacher associations (PTA))
- Examination boards and bodies
- Emergency services
- Professional advisors
- Legal bodies or authorities
- Relevant regulatory authorities
- Organisations we're legally obliged to share personal information with
- Professional consultants
- Other relevant third parties i.e transport companies such as taxi firms

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 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>