

**Privacy Notice** 

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This Privacy Notice explains how Aspire Behaviour Management ('Aspire', 'we', 'us') collects, uses, stores, and shares personal data. We are committed to safeguarding your privacy and complying with data protection laws including the UK General Data Protection Regulation (UK GDPR).

### 1. Who We Collect Data About

We may collect and process personal data relating to:

- Employees
- Clients and school partners
- Pupils and parents supported through our services
- Website visitors and online platform users

#### 2. What Data We Collect

Depending on your relationship with Aspire, we may collect:

- Contact details (name, email, phone, address)
- Employment information (job role, payroll data, DBS checks)
- Pupil data (needs, progress notes, safeguarding concerns)
- Parent/guardian details
- Health or SEN-related information
- Communication logs and feedback
- Technical data (IP address, usage logs from our platforms)

## 3. Why We Collect and Use This Information

We use this information to:

- Deliver outreach and SEND services
- Support staff and employment matters
- Maintain safeguarding and duty of care
- Improve our services and training provision
- Fulfil legal and regulatory obligations

### 4. Legal Basis for Processing

We process personal data under the following lawful bases:

- Performance of a contract (e.g. employee contract or service agreement)
- Legal obligation (e.g. safeguarding, payroll, statutory returns)
- Legitimate interest (e.g. service improvement, communication)
- Consent (only where explicitly obtained)
- Vital interest (e.g. in safeguarding emergencies)

## 5. Data Sharing

We may share your information with:

Schools, academies, and education partners we work with

- Local authorities and safeguarding teams (where legally required)
- The Department for Education (DfE)
- Our professional advisers and service providers (e.g. IT, payroll)

We will never sell your data and will only share what is necessary for the purpose intended.

#### 6. International Transfers

If we use cloud services or third-party tools based outside the UK, we ensure appropriate safeguards (e.g. UK IDTA or SCCs) are in place to protect your data.

#### 7. Data Retention

We retain data only as long as necessary. Staff data is usually kept for 6 years after employment. Service delivery records and pupil data are retained based on safeguarding or contractual requirements.

## 8. Your Rights

You have the right to:

- Access your data
- Request correction or erasure
- Restrict or object to processing
- Data portability (in some cases)
- Withdraw consent (if processing is based on consent)
- Complain to the Information Commissioner's Office (ICO)

### 9. How to Contact Us

To exercise your rights or ask questions about this notice, contact:

Michael Wood, Data Controller

Email: enquiries@aspirebm.co.uk

Phone: 01282 792943

Include 'Subject Access Request' in your email if applicable.

#### 10. Last Review

This notice was last reviewed in July 2025 and will be reviewed annually or when significant changes occur.