



# ANIMALS IN MIND

## PRIVACY POLICY

8<sup>th</sup> December 2025

Version 1.0

Lynn Hart Director / Founder



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## DOCUMENT CONTROL

<b>Policy Title</b>	Privacy Policy
<b>Policy Purpose</b>	To explain how AiM collects, uses, stores, shares, and protects personal information in line with UK GDPR and safeguarding responsibilities.
<b>Author</b>	Lynn Hart – Company Owner
<b>Scope</b>	All staff, volunteers, contractors and partners handling personal data for AiM.
<b>Responsibility</b>	The Company Director / Data Protection Lead
<b>Legal Context</b>	UK GDPR, Data Protection Act 2018, Working Together to Safeguard Children 2023, Education/Alternative Provision guidance.
<b>Review / evaluation</b>	Annual review (or earlier) or where there are substantial government policy changes. Next review due: January 2026. The person making alterations must indicate every change between the previous document version and the altered document version.
<b>Approval</b>	Animals in Mind’s Director/Owner (and trustees, when appointed) will approve and review this policy as part of governance, safeguarding oversight, and information management duties.
<b>Change History</b>	Version1 - 04/22/24: New Document created by Lynn Hart Version 1.1 – 10/12/2025: Updated safeguarding wording, media consent, lawful basis clarification and transparency statements



## POLICY STATEMENT

Animals in Mind (“AiM”, “we”, “us”) provides alternative education, animal-assisted services, therapeutic interventions and vocational learning opportunities. We are committed to protecting the privacy and rights of children, young people, families, schools, local authorities and professionals who work with us.

This Privacy Policy explains how we collect, use, store and share personal information in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Because AiM works directly with children and young people, we process their personal data lawfully, securely and always in their best interests. We do not use children’s data for marketing or profiling. Enhanced safeguarding, confidentiality and access controls apply to all records relating to children and young people.

We collect and process personal information only where it is necessary to deliver safe, appropriate, and effective education or therapeutic services. We do not collect more information than we need, and we never use personal data for automated decision-making or marketing profiling. AiM follows the principle of data minimisation and ensures that no more information is collected or retained than is necessary for the purpose of our work.

If you have any questions, please contact our Data Protection Lead:

**Email:** [lynn@animalsinmind.uk](mailto:lynn@animalsinmind.uk)

## PERSONAL DATA WE COLLECT

### Information about children and young people

We collect only the information necessary to deliver safe, effective education and therapeutic services. This may include:

- Name, date of birth, contact and identification details
- Educational information (attendance, learning needs, qualifications, EHCP details)
- Behaviour, engagement, strengths and barriers to learning
- Risk assessments, safeguarding concerns, relevant history
- Medical information, allergies, access needs
- Special category data relating to health, wellbeing, SEND or behavioural needs
- Photographs, audio or short video evidence when necessary for AQA work, learning evidence or safeguarding\*

\*We may collect photographs, audio, or short video evidence when necessary for learning evidence, AQA accreditation, or safeguarding. Such media is **never used for marketing, publicity or social media without separate explicit consent** from the parent, carer, or responsible professional.



### **Information about parents, carers and professionals**

- Names, addresses and contact details
- Referral information
- Emergency contacts
- Relevant background information required for safe provision

### **Website and technical information**

- IP address, device type and browsing information
- Cookies and preference settings
- Form submissions

We may collect limited location information via IP address to secure our website and improve performance. This does not identify individuals.

## HOW WE USE PERSONAL DATA

### **We process personal data to:**

- Deliver alternative education, therapeutic intervention and animal-assisted services
- Plan sessions and monitor learning and wellbeing progress
- Deliver AQA Unit Award Scheme programmes
- Maintain attendance, safeguarding and risk records
- Manage referrals and communicate with families, schools and local authorities
- Respond to enquiries
- Manage billing, finance and audit requirements
- Meet legal, safeguarding and reporting obligations
- Protect the safety and wellbeing of learners
- Improve our website and services through analytics (consent-based)

AiM never sells personal data.

### **Our Legal Bases for Processing**

Depending on the context, we rely on:

- Public Task – fulfilling functions commissioned by schools/local authorities
- Contract – delivering services where a contract exists (e.g., parent-funded EOTAS)
- Legitimate Interests – responding to enquiries or operating our services
- Legal Obligation – safeguarding, health and safety, financial records
- Vital Interests – protecting a child or young person at immediate risk
- Consent – only where required (e.g., analytics cookies; certain photography)

### **Special Category Data**

For health, SEND, behaviour and safeguarding data, we rely on:

- Explicit consent & vital interests
- Substantial Public Interest (DPA 2018, Schedule 1 – safeguarding, protecting children, provision of education and social care)



## LAWFUL BASIS TABLE

Purpose of Processing	Lawful Basis	Notes
Delivering education, therapeutic and animal-assisted services	Public Task / Contract	Depends on commissioning body (school/LA or parent-funded).
Safeguarding, risk assessment & multi-agency working	Legal Obligation / Vital Interests / Substantial Public Interest	Required under “Working Together to Safeguard Children”.
Managing referrals & communication with families	Legitimate Interests / Public Task	Essential for safe and effective provision.
Special category data (health, SEND, risk)	Explicit Consent / Vital Interests / Substantial Public Interest	DPA Schedule 1 basis for education/safeguarding.
Website analytics	Consent	Only if cookies are accepted.
Finance, invoicing, audit	Legal Obligation	HMRC requires 6-year retention.

## HOW WE STORE YOUR INFORMATION

We use secure systems and trusted providers:

- **SiteGround** – secure website hosting and databases
- **Forminator** – secure referral and form submissions
- **Google Drive** – encrypted cloud storage for educational and safeguarding files
- **Password protection, encryption, 2-factor authentication**
- **Access controls** limited to authorised staff only
- **Audit logs** for sensitive records
- **Staff training** in safeguarding and data protection
- **DBS checks** for all staff working with learners

## WHERE WE STORE PERSONAL INFORMATION

- AiM website submissions: stored on SiteGround (UK/EU servers)
- Operational documents: stored on Google Drive (encrypted at rest and in transit)
- Emails: stored within AiM’s secure email system

Google may store data in international data centres, but all transfers are protected by approved safeguards (IDTA/SCCs and GDPR-compliant contracts).



## SHARING YOUR INFORMATION

External Processors (acting on our behalf)

Used solely to support our operations:

- SiteGround (hosting)
- Google Drive & Google Workspace
- Google Analytics (consent-based analytics)
- Email service providers
- IT support under confidentiality agreements

Other Controllers (where necessary)

We may share information with:

- Schools and local authorities
- Social workers, safeguarding teams and multi-agency partners
- Healthcare or mental health professionals
- AQA (for qualifications)
- Emergency services where required

We do **not** sell or trade personal data.

## SAFEGUARDING & SPECIAL CATEGORY INFORMATION

As an organisation working directly with children and young people, AiM applies enhanced confidentiality controls and access restrictions to all safeguarding, wellbeing, and risk information. Only authorised staff with a legitimate operational need may access these records.

AiM processes sensitive information when necessary to:

- Protect a learner from harm
- Provide appropriate educational or therapeutic support
- Work with statutory partners or safeguarding professionals
- Meet legal, educational or regulatory requirements

All safeguarding processing is strictly controlled, proportionate and carried out in the learner's best interests.



## YOUR RIGHTS UNDER UK GDPR

You have the right to:

- Access your information
- Request correction of inaccurate data
- Request erasure (not always possible for safeguarding/education records)
- Request restriction or object to processing
- Request portability (where applicable)
- Withdraw consent (where consent is the lawful basis)

Some rights may be limited to protect a child, comply with law, or maintain safeguarding records.

## RETENTION PERIODS

**Safeguarding records** – retained until the learner turns **25\***

**Alternative provision records** – 6 years after last contact

**SEND, EHCP and education data** – 6 years

**Financial and invoicing information** – 6 years

**Referral forms** – 6 years unless needed longer for safeguarding

**General enquiries** – 12 months

**Google Analytics data** – 26 months

*\* Where the learner has significant or ongoing social care involvement (e.g., CIN, CP plan, looked-after status, historic safeguarding risk), certain safeguarding records may be retained until **age 35**, due to extended statutory and legal considerations.*

## INTERNATIONAL TRANSFERS

Some data processed by Google or other providers may be stored outside the UK.

All such transfers are protected by GDPR-approved safeguards including the UK IDTA and Standard Contractual Clauses (SCCs).

### Cookies & Analytics

We use Google Analytics to understand how visitors use our website.

Analytics cookies run **only if you provide consent** through our cookie banner.

You may withdraw consent at any time.

Google's opt-out tool is also available.



## HOW TO CONTACT US

For questions or requests about this policy you can apply in writing via email at [lynn@animalsinmind.uk](mailto:lynn@animalsinmind.uk)

## COMPLAINTS

We aim to resolve any concerns **quickly and fairly**.

If you wish to raise a complaint about how your data has been handled, please contact us in writing:

### **Data Protection Lead**

Email: [lynn@animalsinmind.uk](mailto:lynn@animalsinmind.uk)

We will acknowledge your concern and provide a full written response within **one calendar month**, in line with UK GDPR.

For complex matters, we may extend this by up to **two additional months**, but we will always inform you.

If you remain dissatisfied, you may contact the Information Commissioner's Office (ICO):

### **Information Commissioner's Office**

Website: <https://ico.org.uk>

Telephone: 0303 123 1113