PRIVACY NOTICE POLICY

Last reviewed: April 2025
Next review due: April 2027

1.Summary

Salutem Care and Education are committed to safeguarding the privacy of all individuals who interact with our services. This includes children, adult users, parents, educators, institutions, and our own staff. This Privacy Notice explains how we collect, use, disclose, and protect personal information.

We operate in compliance with applicable privacy laws, including the Children's Online Privacy Protection Act (COPPA), General Data Protection Regulation (GDPR), Family Educational Rights and Privacy Act (FERPA), and others.

This notice applies to:

- **Children** (under age 13)
- **Young People** (13 and over)
- **Adults**
- **Parents/guardians**
- **Educators and institutions**
- **Staff** (employees, contractors, and volunteers)

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2.Contents

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3.Who holds my data? Who can I contact?

Salutem Care & Education (company number: 11151161)
Head Office: Minton Place, Victoria Street, Windsor SL4 1EG

Craig Harris
Head of Quality Assurance and Inspections
E: craig.harris@salutemsharedservices.co.uk T: 07436272810
E: notifications@salutemsharedservices.co.uk

You can also contact your Manager, if you have any questions.

4. Information We Collect

Salutem processes (collects, uses, stores, shares, updates, archives, and disposes of) information about the people we support, staff, contractors and volunteers, to comply with the law, meet regulatory requirements, provide a really good standard of care, and to ensure the smooth function of the business. e collect information appropriate to each group:

From Children (Under 13):

- First name, username, or nickname
- Age, grade level, or school
- Learning progress and content usage
- Parent/guardian contact (with consent)

From Adults (13+):

- Full name, email address, contact details
- Learning activity and engagement history
- Feedback or support interactions

From Educational Institutions:

- Teacher/administrator names and contact info
- Class lists or group identifiers (minimized or anonymized where possible)
- Usage data for educational tools

From Staff (Employees & Contractors):

- Full legal name, contact information
- Employment or contract details
- Background checks (where applicable)
- Banking or tax details for payroll

- Usage logs (e.g., access to systems, work email)
- Performance and training records

Your information will never be shared with third parties and is stored in the UK. You can find out more about how we keep your information secure in our Information Security Policy, which is available by request of the Data Protection Officer.

Type of Data	**Purpose**
Name and contact details, such as email address and telephone number	In case we need to contact you about your care and support
Name and contact details of next of kin, as well as other family and friends if required	In case we need to contact them about your care and support
Medical and care information	To provide you with support
Date of birth	To match with records with other providers and for legal reasons
Information relating to any criminal record or acts	To ensure everyone's safety and for legal reasons
Educational and work history	To provide you with support
Preferences	To provide you with support
Daily logs of activities	To provide you with support
Risk assessment	To provide you with support
Financial information	To provide you with support
Safeguarding information	To provide you with support and for legal reasons
Images and videos	To provide you with support, marketing and promotions or staff training – with your consent
Consent records	Legal reasons
Family history	To provide you with support
Religion	To provide you with support
Sexuality	To provide you with support
Gender or gender identity	To provide you with support

We only collect data, if it is relevant to your specific support and care.

We will always try to collect this information from yourself. However, you may also give consent for us to contact medical professionals (like your GP). We may be provided with information from the Local Authority, Social Services, family and friends, and previous providers.

How We Use the Information

We use your information to:

- Provide and enhance our services
- Deliver personalized learning experiences
- Support education partners and track student progress
- Manage employment relationships
- Ensure safety and appropriate use
- Meet legal, regulatory, and compliance obligations

How We Share Information

We **do not sell** personal data.

- We may share information:
- With third-party service providers (under strict confidentiality)
- With schools or educational authorities
- With parents/guardians (when legally required or requested)
- Internally with relevant staff (based on need-to-know)
- As required by law or to protect rights/safety

Parental Rights (for Children's Data)

Parents/guardians may:

- Review their child's data
- Request corrections or deletion
- Withdraw consent for further collection/use

Employee and Staff Privacy Rights

Staff members may:

- Access and review their personal file
- Request correction of inaccurate data

- Request deletion of certain information (where legally permissible)
- Raise concerns about data handling with HR or our Data Protection Officer

Data Security

We implement appropriate technical and organizational safeguards, including:

- Encryption
- Secure storage and access controls
- Employee training and confidentiality agreements

Data Retention

There are statutory, legal guidelines which tell us how long to keep information about the people we support and staff.

CARE RECORDS

Record Type	Retention Period	Legal Basis/Notes
Service user care records (adults)	8 years after discharge/death	NHS Records Management Code
Service user care records (children)	Until the child is 25 (or 26 if in care)	Limitation Act / Children's Act
Incident/Accident reports	8 years	Limitation Act 1980
Safeguarding records (adults)	10 years	CQC / Local Authority Guidance
Safeguarding records (children)	Until the child is 25	ICO / NSPCC best practice
Medication administration records	8 years	Care Standards Act 2000
Mental Capacity/DoLS assessments	8 years	NHS/CQC guidance
Risk assessments	8 years	Best practice
Daily care logs	8 years	Supports care record compliance

EDUCATION RECORDS

Record Type	Retention Period	Legal Basis/Notes
Pupil educational record (maintained school)	Until the pupil is 25	Education Act 2002
Individual learning plans / EHCPs	Until the pupil is 25	Children and Families Act 2014
Attendance records	3 years	Education (Pupil Registration) Regs
Exclusion records	6 years	DfE guidance
SEN records	Until 25 (or 6 years after final contact)	SEND Code of Practice
Pupil reports / assessments	6 years	Best practice

STAFF & HR RECORDS

Record Type	Retention Period	Legal Basis/Notes
Staff personnel files	6 years after employment ends	Limitation Act 1980
DBS check record (evidence only)	6 months	DBS Code of Practice

Mandatory training records	6 years	CQC / HSE
Payroll and tax records	6 years	HMRC requirement
Disciplinary records	6 years (longer if safeguarding)	ACAS / Safeguarding rules

CORPORATE & GOVERNANCE RECORDS

Record Type	Retention Period	Legal Basis/Notes
Board minutes and agendas	Permanently	Companies Act 2006
SMT meeting minutes	10 years	Best practice
Incorporation documents	Permanently	Companies Act 2006
Annual reports / strategic plans	10 years	Governance best practice
Policies and procedures	Current + 6 years	Legal/audit requirement
Quality assurance/audit reports	6 years	CQC / Ofsted compliance

LEGAL & CONTRACTUAL RECORDS

Record Type	Retention Period	Legal Basis/Notes
Contracts (e.g., suppliers, funders)	6 years (12 if deed)	Limitation Act 1980
Leases and property agreements	6–12 years after expiry	Legal limitation period
Insurance policies / claims	6 years (permanently if safeguarding-related)	FCA / Risk Management
Litigation files	Until resolution + 6 years	Legal protection

FINANCIAL RECORDS

Record Type	Retention Period	Legal Basis/Notes
Annual accounts / financial statements	6 years	HMRC / Charities Act
Internal financial reports / budgets	6 years	Operational best practice
Tax records (VAT, PAYE, CT)	6 years	HMRC requirement
Purchase invoices / receipts	6 years	HMRC requirement
Bank statements / reconciliations	6 years	HMRC
Asset registers	Life of asset + 6 years	Financial audit needs

COMMUNICATIONS & IT RECORDS

Record Type	Retention Period	Legal Basis/Notes
Emails (corporate, relevant content)	2–7 years	GDPR / Best practice
IT system backups	Variable (e.g., 30 days)	Operational risk management
Data breach logs	6 years	GDPR / ICO compliance
Cybersecurity incident logs	6 years	Risk mitigation
CCTV footage	30 days (unless incident captured)	ICO guidance

OTHER RECORDS

Record Type	Retention Period	Legal Basis/Notes
Complaints records	6 years	Limitation Act
Consent forms	Duration of related activity + 6 years	GDPR compliance

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All records should be securely disposed of once their retention period has expired. Records related to safeguarding, serious incidents, or ongoing legal matters should be retained longer.

For questions, contact your Data Protection Officer or visit: Craig.harris@salutemsharedservices.co.uk notifications@salutemsharedservices.co.uk

Consent To Use My Information?

We collect and process personal information based on appropriate legal grounds, including **consent** where required.

- **Children under 13**, we obtain **verifiable parental or guardian consent** before collecting personal data, in accordance with COPPA and similar international laws.
- **Children aged 13 to 17**: In many jurisdictions, children over the age of 13 may give **direct consent** for certain types of data processing (i.e. creating an account, using educational content). However, we may still notify or involve a parent or guardian depending on the data collected, the nature of the service, and regional legal requirements. Where required, we will request **both the child's and parent's consent**.

- **Adults with a Learning Disability:** We recognize that some adult users may require assistance or additional support when providing informed consent. Where appropriate, we encourage the involvement of a parent, guardian, carer, or support professional. We strive to present consent options in clear, accessible language and formats to support understanding. If a legal representative or caregiver is responsible for decisions, we will respect lawful instructions and ensure all actions comply with applicable legislation such as the Mental Capacity Act (2005) in the UK or relevant regional protections.

- **Staff (employees, contractors, volunteers)**: Consent is obtained as part of onboarding, contractual agreements, and for specific activities involving sensitive personal data (i.e. background checks, payroll, optional programs). In some cases, processing of employee data is required for legal or operational purposes, in which case we inform staff accordingly. Optional uses (such as participation in internal surveys or public staff profiles) will always require separate consent.

Withdrawing Consent: All individuals—including children, guardians, and staff—may withdraw their consent at any time by contacting us. Withdrawal will not affect the legality of any processing conducted before the withdrawal but may affect access to certain features or services where consent is required.

In some employment-related contexts, certain data processing may still be required for operational, legal, or contractual reasons.

Data Subject Rights

- You have a right to request a copy of any information relating to yourself
- You have the right to ask us to rectify, put right, or amend any information relating to yourself
- You have the right to ask us to delete any information we hold about you and, where we do not hold that information for a legal or regulatory reason, we will comply
- You have the right to ask us to share any information with a third party on your behalf
- You have the right to complain about how we have used, shared, deleted, or otherwise handled your information
- You have the right to ask us to only use your information in certain ways

If you wish to exercise any of these rights, please contact your service manager or the Data Protection Officer.

Version Control

This is a controlled document. As a controlled document, any printed copies of this document, or saved onto local or network drives should be actively monitored to ensure the latest version is always available.

Version Number	Date	Status	Changes
V2.0	March 2022	Published	Format
V2.2	April 2025	Draft	Rewritten