



PRIVACY NOTICE

Setting: The Lodge

Organisation and data controller: PJ Creative Learning Ltd

Version: 1.1

Date approved: 31 August 2026

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Status: Live

About this notice

This Privacy Notice explains how PJ Creative Learning Ltd, operating as The Lodge, collects and uses personal information. It applies to learners, parents and carers, staff, volunteers, visitors, contractors and professionals connected with our work.

PJ Creative Learning Ltd is the data controller. This means that the company is responsible for deciding how and why personal information is used and for keeping it secure.

For learners

We use information about you so that we can support you safely and understand what helps you learn. You can ask us what information we hold, tell us if something is wrong, or ask a trusted adult to help you contact us.

Who we are

The Lodge is a creative learning space operated by PJ Creative Learning Ltd. We provide commissioned, part time, one to one educational support for young people aged 11 to 18. Learners remain on roll at their main education setting or are supported through another agreed commissioning arrangement.

Data protection contact: The Lodge Lead

Email: lodge@pjcreativelearning.co.uk

Information we collect

We collect only information that is relevant to the support being provided or to the safe and lawful operation of The Lodge. This may include:

- identity and contact information, including names, dates of birth, addresses and emergency contacts;
- education information, such as referral details, EHCP information, support plans, learning needs, attendance, engagement, progress and session records;
- health, disability, allergy, medication, wellbeing, behaviour, safeguarding and risk information where relevant;
- communications with learners, families, referring settings and professionals;
- photographs or videos where their use has been explained and the appropriate permission or other lawful basis is in place;
- visitor, accident, incident, complaint and site security records; and
- staff, volunteer and contractor information, including recruitment, identity, right to work, DBS check details, qualifications, training, payroll and professional records.

Where information comes from

Information may come directly from the individual concerned, or from a parent or carer, referring school or setting, local authority, health or social care professional, emergency service, staff member, volunteer, contractor or another person involved in providing support. We also create records through our own contact, observations and day to day work.

Why we use information and our lawful bases

We use personal information to provide commissioned support, plan and record learning, maintain attendance and engagement information, communicate with the people involved, safeguard learners, respond to health or safety needs, manage staff and volunteers, meet financial and regulatory duties, and operate the premises securely.

Depending on the purpose, our lawful basis under Article 6 of the UK GDPR is:

- **Legal obligation:** where we must meet safeguarding, health and safety, employment, accounting or other legal duties.

- **Legitimate interests:** where it is necessary to provide and manage commissioned educational support, maintain appropriate records, communicate with referring settings and families, protect people and property, or manage the organisation. We consider the individual's rights before relying on this basis.
- **Contract:** where processing is necessary to enter into or perform a contract with the person concerned.
- **Vital interests:** where information is needed to protect someone's life in an emergency.
- **Consent:** for genuinely optional uses, such as particular photographs or publicity. Consent can be withdrawn at any time without affecting earlier lawful use.

Special category and criminal offence information

Some information, including health, disability, ethnicity, religion or safeguarding information, receives additional protection. Where we use this information, we must also meet an Article 9 condition. Depending on the circumstances, this may include substantial public interest under the Data Protection Act 2018 for safeguarding children and people at risk, employment and social protection obligations, vital interests in an emergency, or explicit consent where the use is genuinely optional.

Information about criminal allegations, convictions or DBS checks is used only where permitted by law and necessary for safeguarding, safer recruitment or the protection of learners and others.

How information is used and shared

Access is limited to people who need the information for their role. Where necessary and lawful, relevant information may be shared with:

- the learner, their parent or carer and their referring school or setting;
- local authorities, health professionals, children's social care, safeguarding partners or other professionals involved in support;
- emergency services, police, insurers, legal advisers, regulators or courts where necessary; and
- carefully selected service providers that support secure IT, communications, finance, record storage or other business functions.

We share only what is necessary, check that there is a lawful basis, and use appropriate confidentiality or data processing arrangements. We do not sell personal information and do not use it for third party advertising.

Safeguarding information

Information may be shared without consent where this is necessary and lawful to protect a child or another person from harm, respond to a safeguarding concern or meet a legal duty. Safeguarding decisions are made in line with The Lodge Safeguarding and Child Protection Policy and current statutory guidance.

Photographs, videos and work devices

Learner photographs and videos are taken only for an identified educational, record keeping or agreed publicity purpose. Appropriate permission is obtained where consent is the lawful basis. Images are taken only on an authorised work device, transferred promptly to the approved secure record where needed, and deleted from the device when the transfer or purpose is complete. Personal devices and personal cloud accounts must not be used for learner images.

Storage, security and international processing

Electronic information is held on password protected work systems and authorised devices. Paper records are stored securely. Access is restricted and two step verification, appropriate sharing controls and secure disposal are used where relevant.

Some approved technology providers may process information outside the UK. Where this occurs, PJ Creative Learning Ltd ensures that an appropriate legal safeguard is in place, such as UK adequacy regulations or approved contractual protections.

How long we keep information

We keep information only for as long as it is needed for the purpose for which it was collected and to meet safeguarding, legal, insurance, contractual and accountability requirements. Our usual approach is:

- **Learner support records:** normally retained for the commissioned arrangement and six years afterwards, unless secure transfer, earlier deletion or longer retention is appropriate.
- **Safeguarding records:** retained or securely transferred in line with safeguarding requirements and agreed responsibilities. They are not destroyed while relevant to a concern.
- **Financial records:** normally retained for six years after the relevant financial year.
- **Staff, volunteer and recruitment records:** retained as required for employment, safeguarding, insurance or legal purposes. Unnecessary DBS certificate copies are not kept.
- **Images:** retained only for the agreed purpose and reviewed when that purpose ends or consent is withdrawn, subject to any continuing record keeping requirement.

A more detailed retention schedule is maintained internally. If a legal claim, safeguarding concern or investigation is ongoing, relevant information may need to be kept for longer.

Your rights

Depending on the lawful basis and circumstances, individuals may have the right to:

- be informed and ask for access to their personal information;
- have inaccurate or incomplete information corrected;
- ask for information to be erased or restricted, or object to particular processing, in certain circumstances;
- receive certain information in a portable format;
- withdraw consent where consent is relied upon; and
- challenge a significant decision made solely by automated means.

These rights are not absolute and we will explain if a request cannot be fully met. We normally respond to a valid rights request within one month. The Lodge does not currently make solely automated decisions about learners, staff or other individuals.

A learner may exercise their own data protection rights where they have sufficient understanding. A parent, carer or representative may act for a learner where this is appropriate and their authority can be confirmed. We consider understanding and circumstances rather than applying a fixed age rule.

Questions, requests and data protection complaints

Questions, rights requests or complaints can be sent to the Data Protection Contact using the details above. We will help people explain their concern, acknowledge a data protection complaint within 30 days, investigate it, provide updates and communicate the outcome without undue delay.

If you remain dissatisfied, you may complain to the Information Commissioner's Office (ICO): www.ico.org.uk | 0303 123 1113

Data breaches

Suspected loss, unauthorised access, disclosure or misuse of personal information is recorded, contained and assessed promptly. Where required, the ICO will be notified as soon as possible and, where feasible, within 72 hours. Individuals will be told without undue delay where the breach is likely to create a high risk to them.

Review and related policies

This notice is reviewed at least annually and sooner if our use of information, the law or our operating arrangements change. Material changes will be explained before new processing begins where required.

Read this notice alongside The Lodge's Full GDPR Policy, Safeguarding and Child Protection Policy, Online Safety Policy, Complaints Policy and Staff Code of Conduct.