

# Privacy Policy

Femtos Learning Hub

## 1. Introduction

Femtos Learning Hub (“we”, “us”, “our”) is committed to protecting the privacy and personal data of all children, parents, carers, adult participants, staff, contractors, and visitors.

We recognise our responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and take data protection, confidentiality, and safeguarding seriously.

This Privacy Policy explains how we collect, use, store, share, and protect personal data, and outlines individuals’ rights in relation to their information.

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## 2. Who We Are (Data Controller)

Femtos Learning Hub is operated by Inquisitive Explorers and/or its parent company.

For the purposes of data protection legislation, we are the Data Controller of personal data processed in connection with our workshops, sessions, events, courses, and hub activities.

Data protection contact: [info@femtos.com](mailto:info@femtos.com)

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## 3. What Personal Data We Collect

### 3.1 Children and Young People

We may collect and process personal data relating to children and young people, including but not limited to:

- Name, age, and date of birth
- Current or previous educational setting (including school or alternative provision)
- Eligibility indicators such as Free School Meals (FSM) status
- Nationality and residency status (where required)
- Indicators of vulnerability where relevant to safeguarding or funding criteria
- Emergency contact details
- Medical information, allergies, disabilities, and Special Educational Needs (SEN), where provided
- Attendance, participation, incident, and safeguarding records where necessary

Some of this information may be collected in order to:

- Assess eligibility for funded or subsidised places
- Meet the requirements of funders, grant providers, or commissioners
- Support targeted outreach where funding criteria apply
- Ensure the safe, appropriate, and inclusive delivery of sessions

Where personal data is collected for funding or eligibility purposes, it is used only for those purposes and handled in accordance with applicable data protection legislation.

### **3.2 Parents, Carers, and Adult Participants**

- Name and contact details
- Booking and payment information
- Communication preferences
- Relevant access, medical, or support needs where disclosed
- Financial or household information provided voluntarily by parents or carers for the purpose of assessing eligibility for scholarships, grants, funded places, or financial support programmes

### **3.3 Media and Visual Data**

- Photographs and video recordings (where identifiable and consent is given)
- Non-identifiable images for documentation, reporting, evaluation, and marketing purposes

### **3.4 CCTV (Video and Audio)**

- Video and audio recordings captured via internal and external CCTV systems operating at the hub

### **3.5 Operational and Administrative Data**

- Communications with us (emails, forms, messages)
- Incident and accident reports
- Attendance, delivery, and funding evidence
- Records required for legal, safeguarding, or regulatory purposes

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## **4. How We Collect Personal Data**

Personal data is collected through:

- Booking, registration, and consent forms
- Direct communication with parents, carers, and participants

- Attendance at sessions and events
- CCTV systems operating on site
- Safeguarding, health and safety, and operational processes

We collect only data that is **necessary, relevant, and proportionate**.

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## 5. Lawful Bases for Processing

We process personal data under one or more of the following lawful bases:

- **Consent** – e.g. identifiable photography and video
- **Contract** – to deliver booked sessions and services
- **Legal obligation** – safeguarding, health & safety, funding, and regulatory compliance
- **Vital interests** – to protect a child or individual in an emergency
- **Legitimate interests** – safeguarding, security, operational management, and relevant communications

Medical information and Special Educational Needs (SEN) data are processed solely for the purpose of supporting the safe, appropriate, and inclusive delivery of sessions. This includes assessing whether we have the appropriate level of staff training, qualifications, experience, and resources in place to safely and effectively support a participant's needs, and whether reasonable adjustments can be made within the scope of the session.

Special category data is handled with additional safeguards and restricted access.

Financial and household information provided by parents or carers for the purpose of assessing eligibility for scholarships, grants, or funded places is processed only where necessary and under legal obligation or legitimate interests, and is used solely for the purpose of determining eligibility and administering financial support.

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## 6. How We Use Personal Data

We use personal data to:

- Deliver workshops, sessions, and events safely
- Communicate with parents, carers, and participants
- Manage bookings, attendance, and funded places
- Support safeguarding and wellbeing
- Meet health and safety obligations
- Assess eligibility and meet funder requirements
- To assess eligibility for scholarships, grants, or other forms of financial support for a child or family, where such information has been provided voluntarily and is required to meet funding or allocation criteria

- Document delivery for reporting, evaluation, and compliance
- Investigate incidents, complaints, or safeguarding concerns
- Inform parents, carers, and adult participants about future workshops, sessions, events, or programmes that are related to their previous participation and delivered by Femtos Learning Hub or our group of related companies, where such communications are relevant and proportionate

Marketing or promotional communications are sent only to adults, never directly to children, and recipients are provided with a clear opportunity to opt out at any time.

We do not sell personal data or use it for unrelated third-party marketing.

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## 7. Photography, Video, and Media Use

- Consent for identifiable photography and video is collected in writing via registration forms.
- Where consent is not given, we may still capture non-identifiable images (e.g. hands, backs, work, blurred or distant shots).
- Non-identifiable images do not constitute personal data under data protection legislation.
- Participants may not record sessions without prior written permission.

Media is used only for:

- Marketing and promotional purposes
- Educational documentation
- Funding, reporting, and evaluation

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## 8. Data Sharing

We may share personal data **only where necessary and proportionate** in order to deliver our services safely and effectively.

This may include sharing data with:

- Staff, facilitators, and contractors delivering sessions
- Third-party service providers acting on our behalf (for example, external video editors, designers, IT providers, or administrative support)
- Funders, partners, or commissioners (anonymised or aggregated where possible)
- Safeguarding bodies, Local Authorities, regulators, or emergency services where required by law or safeguarding duty

We may also share personal data within our group of related companies where this is necessary for operational delivery, safeguarding, administration, or compliance.

All third parties and group companies are required to process data only on our instructions, maintain confidentiality, and implement appropriate security measures.

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## 9. Data Storage and Retention

Personal data is stored securely, with access restricted to authorised personnel only.

Data is retained:

- Only for as long as necessary for the purpose for which it was collected
- In line with safeguarding, legal, funding, and regulatory requirements

Safeguarding, incident, and complaint records may be retained for longer where required by law or statutory guidance.

Data is securely deleted or anonymised when no longer required.

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## 10. CCTV (Video and Audio Recording)

Femtos Learning Hub operates internal and external CCTV systems, which include video and audio recording, for the purposes of safeguarding, safety, security, and incident management.

CCTV is used to:

- Protect children, adults, staff, and visitors
- Support safeguarding and behaviour management
- Investigate incidents or concerns
- Protect the premises and property

CCTV recordings:

- Are accessed only by authorised personnel
- Are reviewed only where necessary
- Are retained for a limited period unless required for investigation or legal purposes
- May be shared with relevant authorities (e.g. police, Local Authorities, insurers) where lawful and appropriate

Clear signage is displayed indicating that CCTV and audio recording are in operation.

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## 11. Children's Data

We recognise that children's personal data requires additional protection.

- Children's data is collected only where necessary for delivery, safety, safeguarding, or compliance
- Decisions relating to children's data are made in the best interests of the child
- Data is handled with heightened care, confidentiality, and restricted access

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## 12. Individual Rights and Subject Access Requests

Under data protection law, individuals have the right to:

- Access their personal data
- Request correction of inaccurate or incomplete data
- Request deletion of data (where applicable)
- Restrict or object to processing
- Withdraw consent where processing is based on consent

Requests must be made in writing. We may need to verify identity before responding.

### 12.1 Subject Access Requests (SARs) and Fees

Subject Access Requests are normally processed free of charge.

However, where a request is manifestly unfounded or manifestly excessive, including repeated requests for the same information or requests requiring disproportionate administrative effort, we reserve the right to:

- Charge a reasonable administrative fee based on the cost of compliance, or
- Refuse the request

Any decision to charge a fee or refuse a request will be explained in writing.

### 12.2 Deletion Requests and Limitations

Where a request for deletion is made, we will make every reasonable effort to delete or anonymise personal data held in our systems.

Deletion may not be possible in all circumstances, including where:

- Data must be retained for safeguarding, legal, regulatory, or funding purposes
- Data forms part of a safeguarding, incident, or complaint record
- Data has already been incorporated into printed materials, reports, or publications
- Data has been lawfully published or widely distributed (for example in video or promotional materials) and cannot reasonably be withdrawn or edited without disproportionate effort

Requests requiring substantial re-editing, reprinting, or re-publication may be declined or may be subject to a reasonable administrative or production fee. Individuals will be informed in advance where this applies.

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## 13. Freedom of Information

Femtos Learning Hub is a privately operated organisation and is not subject to the Freedom of Information Act 2000.

Where we deliver services in partnership with or on behalf of public bodies, information may be shared with those bodies in accordance with contractual, legal, and data protection requirements. Personal data will not be disclosed in response to Freedom of Information requests except where required by law.

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## 14. Complaints

If you have concerns about how personal data is handled, please contact us in the first instance so we can address the issue.

You also have the right to raise concerns with the **Information Commissioner's Office (ICO)**.

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## 15. Updates to This Policy

This Privacy Policy may be updated from time to time to reflect legal, operational, or regulatory changes.

The most current version will always apply and will be available via our website or on request.

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