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## Privacy Statement

January 2022

### Our work

Bloom is a consultancy service providing expert advice and support around special educational needs and inclusion. Our customers would typically be schools, workplaces or private individuals. For more information, please use the contacts at the foot of this page.

### What type of personal data do we collect?

In the course of our work, we will collect and process data that can identify individuals. Most commonly, this data will include names, addresses, dates of birth etc. The nature of our work means that we may also process sensitive personal data, including information about a person's health or ethnic origin. Our work is personalised around the requirements of the individual or the school we are working for, and so these lists are not exhaustive.

### How do we get this personal data?

When working with an organisation, the organisation contracting us takes the role of Data Controller, providing us – the Data Processor – with personal data, usually relating to pupils.

When working with a private individual, we will receive the personal data directly from them. We are therefore the Data Controller. The majority of the personal data received will usually relate to the child of the private individual.

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### **Why do we process this personal data?**

Processing of personal data means any treatment of personal data, including collecting, , recording, organising, storing, sharing, erasing and destroying. Personal data will be used only to fulfil the agreed terms of the service we are delivering to the customer. These will be outlined clearly in a Project Proposal that has been agreed by the customer and in further project documentation that will be communicated with the customer as project delivery commences (see our Terms of Engagement).

Our most common lawful basis for processing personal data are:

**Contract:** We need to share the data in order to deliver the service that you have requested as a customer.

**Legitimate Interests:** Processing the data is necessary for us to deliver the services as described at the top of this Privacy Statement.

**Consent:** Where we have explicit consent from the Data Subject (or their parent/guardian). Consent can be withdrawn at any time.

Whilst these are the basis we would expect to use in the normal course of our work, there are others that we may rely on in exceptional circumstances. More information about these lawful basis can be found here:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>.

### **Who might we share personal data with?**

In fulfilling a service to a school, typically personal data will not be shared outside of the school. However it may be necessary to share some data with health or education professionals.

In fulfilling a service to a private individual, personal data may be shared with relevant health, education or statutory bodies.

### **How do we store personal data?**

Personal data is typically kept in a password protected digital format. Personal data kept in physical form will always be kept securely locked up when not in use.

### **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

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**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details at the bottom of this document.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>