Client and Pupil Privacy Notice

Version	2.0
Date Policy Reviewed	September 2026
Policy Reviewed by	Head of Compliance
Date of Next Review	August 2027

Fleet Education Services

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, the General Data Protection Regulation (GDPR), was retained in UK law and is known as the UK GDPR. The UK GDPR operates alongside the Data Protection Act 2018, which supplements it by setting out additional provisions on matters such as the processing of personal data in specific sectors, exemptions, the powers of the Information Commissioner, and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and Data Protection Act 2018 to modernise UK data protection rules and clarify certain rights and obligations. The GDPR continues to apply within the EU and to organisations that process personal data of individuals located in the EU.

This notice applies to all pupils and clients.

Data Controller

Fleet Education Services (the Company) is an education service provider which provides education services for clients and work-finding services to its work-seekers whom it places educators with clients to provide educational support, teaching, mentoring, learning support and specialist educational services for children and young people.

We are a "data controller", which means that we are responsible for deciding how we hold and use personal information about pupils and clients, including parents as well as data provided by schools and local authorities.

Depending on the service being provided, Fleet Education Services may act as either a Data Controller or a Data Processor. Where we process personal data solely on behalf of a school, local authority, alternative provision provider or other commissioning organisation, we will do so in accordance with their documented instructions and applicable data protection legislation. Where we determine the purposes and means of processing personal data, Fleet Education Services acts as the Data Controller.

This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

Fleet Education Services forms part of Supporting Education Group (SEG). Certain support services are provided across the group, including IT, information security, safeguarding, compliance, human resources, finance, operational support and management services. As a result, personal information may be accessed and processed by authorised personnel within Fleet Education Services, SEG or other group companies where necessary to provide these services and where a lawful basis exists to do so. All processing is carried out in accordance with applicable data protection legislation and appropriate security measures.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

Information Collected

We may collect, store and use the following categories of personal information about you:

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics such as language, nationality, country of birth and free school meal eligibility;
- Attendance details such as sessions attended, number of absences and reasons for absence;
- Financial details in order to ensure effective payment is made;
- Performance and assessment information;
- Behavioural information, including exclusions;
- Recordings of pupils and/or parents from the Company's video conferencing platform;
- Images of pupils engaging in provision activities;
- Information about the use of our IT, communications and other systems, and other monitoring information.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs
- Information about your health, including any medical conditions and sickness records.
- Special educational needs information;

While the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Sources of Information

We collect personal information from a variety of sources in order to provide education and support services. These sources may include:

- Parents, carers and family members;
- Pupils and learners, where age and understanding make this appropriate;
- Schools, academies and multi-academy trusts;
- Local authorities and commissioning organisations;
- Alternative provision providers;
- Health professionals and other agencies involved in supporting a child or young person;
- Previous education providers; and
- Other organisations where information sharing is necessary to support education, welfare or safeguarding needs.

We only collect information that is relevant, necessary and proportionate for the purposes for which it is processed.

Purposes of Processing

We will only use your personal information when the law allows us to do so. Most commonly, we will hold pupil data and use it for:

- Providing education services and extra-curricular activities to pupils, and monitoring progress and educational needs;

- Providing educational support services, teaching, mentoring, alternative provision and specialist educational services as agreed;
- Assessing performance and setting targets;
- Safeguarding pupils' welfare and providing appropriate pastoral, and where necessary medical, care;
- Supporting teaching and learning;
- Giving and receiving information and references about past, current and prospective pupils and providing references;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments and to record pupil achievements;
- Carrying out statistical analysis for diversity purposes;
- Legal and regulatory purposes, for example child protection, diversity monitoring and health and safety, and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor performance;
- Monitoring use of the Company's IT and communications systems in accordance with the Company's IT security policy;
- Making use of photographic images on social media and on the website;
- Security purposes; and
- Where otherwise reasonably necessary for the Company's purposes, including to obtain appropriate professional advice and insurance.

Safeguarding Information

Fleet Education Services is committed to protecting the privacy, welfare and safety of children and young people. Personal information is collected and used to support the delivery of education services, promote learner progress, meet individual needs and fulfil our safeguarding responsibilities.

Depending on a child's age and level of understanding, parents or carers may exercise data protection rights on their behalf. Where appropriate, children and young people may exercise their own rights in accordance with applicable data protection legislation.

We may share personal information without consent where this is necessary to protect a child, young person or vulnerable individual from harm, to fulfil safeguarding obligations, or where we are otherwise required or permitted to do so by law. Any such sharing will be carried out securely, proportionately and only where there is a lawful basis for doing so.

Safeguarding Records and Information Sharing

As part of our safeguarding responsibilities, Fleet Education Services may create, receive, hold and process safeguarding information relating to children, young people and vulnerable individuals.

Safeguarding information may include concerns raised, disclosures, observations, welfare information, risk assessments, safeguarding actions, referrals, communications with relevant professionals and decisions made to support the safety and wellbeing of a child or young person.

Where necessary and proportionate, information may be shared with schools, local authorities, social care services, the police, health professionals, safeguarding partners or other agencies involved in protecting a child or vulnerable person from harm.

Personal information may be shared without consent where this is necessary to protect an individual from harm, fulfil safeguarding obligations or where sharing is otherwise required or permitted by law.

Access to safeguarding information is restricted to authorised individuals with a legitimate safeguarding or operational need to know.

AI Use

Fleet Education Services and Supporting Education Group may use approved artificial intelligence (AI) tools to support activities such as drafting documents, summarising information, analysis, research, quality assurance, compliance activities and workflow automation.

These tools operate only within approved systems and are intended to access information that authorised staff are already permitted to view. AI-generated outputs are advisory in nature and remain subject to appropriate human review and oversight.

We apply safeguards to support responsible use of AI, including staff training, data minimisation measures, access controls, monitoring of AI use and restrictions on the use of non-approved external AI tools.

Where personal information is processed using AI technologies, we will ensure that processing is carried out in accordance with UK GDPR, data protection legislation and applicable information governance requirements.

Lawful Basis

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law, not including contractual obligations;
- Vital interests: the processing is necessary to protect someone's life;
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- Legitimate interests: the processing is necessary for the purposes of the Company's legitimate interests, or those of a third party, provided those interests are not overridden by the rights and freedoms of the data subject.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

How We Use Particularly Sensitive Personal Information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation or biometrics, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations in line with our data protection policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring.
- Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests, or someone else's interests, and you are not capable of giving your consent, or where you have already made the information public.

Sharing Information

We may need to share personal information with third parties where it is necessary and lawful to do so. Access to personal information is subject to strict controls, and we will only share information where there is an appropriate reason, such as to support education, welfare or

safeguarding needs, protect an individual from harm, fulfil our legal obligations, or where we are otherwise required or permitted to do so by law.

We may share pupil information with:

- Local Authorities;
- The school attended by the pupil;
- NHS;
- Welfare services, such as social services;
- Law enforcement officials, such as police and HMRC;
- Local Authority Designated Officer;
- Professional advisers, such as lawyers and consultants;
- Support services, including insurance, IT support and information security;
- Providers of learning software; and
- Government agencies.

Information will be shared securely and anonymised where appropriate and possible. Recipients will be required to keep the information confidential, respect the security of the data and handle it in accordance with applicable data protection legislation.

International Transfers

In some circumstances, personal information may be transferred outside the United Kingdom. Where this occurs, Fleet Education Services will ensure that appropriate safeguards are in place in accordance with UK GDPR requirements. These safeguards may include adequacy regulations, the UK International Data Transfer Agreement (IDTA), or other approved contractual arrangements designed to protect personal information and maintain individuals' rights and freedoms.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are required to ensure that appropriate safeguards are in place when using automated decision making for significant decisions and the circumstances in which we are permitted to use special category data (sensitive information) in automated decision making are limited.

You will not be subject to automated decision making for significant decisions unless we have a lawful basis, and a valid condition where required, for doing so and appropriate safeguards are in place. Appropriate safeguards include informing the relevant individuals about the automated decision making and their rights to request a human review, express their views, and contest the decision.

Retention

Fleet Education Services retains personal information only for as long as necessary to fulfil the purposes for which it was collected, to meet safeguarding responsibilities and to comply with legal, contractual and regulatory obligations.

Retention periods vary depending on the type of information held. Records relating to educational provision, safeguarding concerns, referrals, risk assessments, complaints and associated communications may be retained in accordance with statutory guidance, safeguarding requirements and limitation periods applicable to legal claims.

Where information is no longer required, it will be securely deleted, destroyed or anonymised.

Detailed retention periods are contained within Fleet Education Services' Data Retention Policy and associated safeguarding procedures.

Security

We have put in place measures to protect the security of your information, including against it being accidentally lost, used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

You can find further details of our security procedures within our Data Breach Policy.

It is important that the personal information we hold about you is accurate and current. Please keep us information if yours or your child's personal information changes.

Rights

Under certain circumstances, by law you have the right to:

- Access your personal information, commonly known as a "subject access request". This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.

- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances, for example for direct marketing purposes.
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the Data Protection Officer at dataservices@judicium.com in writing. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information, or to exercise any of your other rights. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer at dataservices@judicium.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Complaints

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with feedback@fleeteducationservices.com in the first instance. We will acknowledge receipt of your complaint within 30 calendar days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by feedback@fleeteducationservices.com, then you can contact the DPO on the details below:

Data Protection Officer:	Judicium Consulting Limited
Address:	5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email:	dataservices@judicium.com
Web:	www.judiciumeducation.co.uk

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Version Control

Version	Date	Author	Summary of Changes	Approved By	Next Review Date
2.0	September 2026	Head of Compliance	Addition of automated decision making	Judicium	August 2027