Fleet Educator Privacy Notice

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

1. Policy Statement

Fleet Education Services ("Fleet", "we", "our" or "us") is committed to protecting the privacy, confidentiality and security of personal information relating to educators and prospective educators.

This Privacy Notice explains how we collect, use, store, retain and share personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

Fleet Education Services forms part of Supporting Education Group (SEG). Some personal information may be processed with support from SEG or other group companies where they provide shared services such as HR, IT, Finance, Marketing, Management Support, Safeguarding, Compliance or Operational Support.

2. Purpose

The purpose of this Privacy Notice is to:

- Explain what personal information Fleet collects.
- Explain how and why personal information is processed.
- Inform educators of their data protection rights.
- Support transparency and accountability in data processing activities.
- Demonstrate compliance with legal, regulatory and safeguarding obligations.

3. Scope

This Privacy Notice applies to:

- Applicants seeking employment with Fleet.
- Current employees.
- Former employees.
- Educators delivering services on behalf of Fleet.
- Individuals engaged throughout recruitment, onboarding and employment processes.

This notice applies to all education professionals engaged by Fleet Education Services, including teachers, tutors, mentors, learning support specialists and other educators.

4. Definitions

UK GDPR

The United Kingdom General Data Protection Regulation.

Data Controller

The organisation responsible for determining how and why personal information is processed.

Special Category Data

Personal information requiring additional protection under data protection legislation, including health information and disability information.

Criminal Offence Data

Information relating to criminal records, DBS checks, allegations or safeguarding investigations.

SEG

Supporting Education Group.

5. Roles and Responsibilities

Fleet Education Services

Fleet Education Services acts as the Data Controller and is responsible for ensuring that personal information is processed lawfully, fairly and securely.

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.

Managers and Compliance Teams

Managers and compliance teams are responsible for ensuring personal information is processed appropriately, securely and only when required for legitimate business purposes.

Educators

Educators are responsible for providing accurate information, keeping information up to date and complying with Fleet policies relating to data protection, information security and safeguarding.

6. Privacy and Data Protection Requirements

6.1 Data Protection Principles

Fleet will ensure personal information is:

- Processed lawfully, fairly and transparently.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Retained only as long as necessary.
- Processed securely and protected against loss, misuse or unauthorised access.
- Processed in accordance with individual rights under UK GDPR.

6.2 Information We Collect

Personal Information

Personal information may include:

- Name, title and contact details.
- Date of birth.
- Emergency contact information.
- Employment history and work experience.

- CV and application information.
- Qualifications and professional certifications.
- Teacher Reference Number (where applicable).
- Training records.
- References.
- Right to Work documentation.
- National Insurance number.
- Payroll and pension information.
- Bank account details.
- Availability, deployment and assignment information.
- Quality assurance reviews and observations.
- Consultant and support notes.
- Client feedback.
- Communication records.
- Website usage information and online interactions.

Special Category Information

This may include:

- Health information relevant to fitness to work.
- Disability information.
- Reasonable adjustment requirements.
- Equality, diversity and inclusion information provided voluntarily.

Criminal Offence Data

Where safeguarding obligations require, Fleet may process:

- Enhanced DBS information.
- DBS Update Service status.
- Criminal conviction information disclosed during vetting.
- Overseas criminal record checks.
- Safeguarding investigations and related information.

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.

6.3 How We Collect Information

Information may be collected directly from educators during recruitment, onboarding, training, employment and day-to-day engagement.

Information may also be obtained from:

- Referees.
- Previous employers.
- Disclosure and Barring Service (DBS).
- Teaching Regulation Agency.
- UK Visas and Immigration.
- Local authorities.
- Educational settings.
- Professional bodies.
- Recruitment platforms.
- Publicly available sources where lawful and appropriate.

6.4 Why We Process Information

Recruitment and Vetting

To assess suitability for employment, verify identity, qualifications, references, Right to Work status and safeguarding requirements.

Employment Administration

To manage payroll, pensions, assignments, workforce planning, training, professional development and quality assurance activities.

Safeguarding and Child Protection

To fulfil safeguarding obligations, investigate concerns, manage low-level concerns, support safer recruitment decisions and protect children, young people and vulnerable adults.

Legal and Regulatory Compliance

To comply with employment law, HMRC obligations, health and safety legislation, safeguarding requirements and education sector standards.

6.5 Safeguarding Information, Low-Level Concerns and Allegations

Fleet may process safeguarding information relating to:

- Safeguarding concerns.
- Low-level concerns.
- Allegations.
- Professional conduct concerns.
- Referrals to external agencies.
- MyConcern records.

- MyCommunity reports.

Records may include:

- Concerns raised.
- Disclosures.
- Observations.
- Investigations.
- Decisions and actions taken.
- Outcomes.

Safeguarding information may be shared without consent where necessary to protect children, young people or vulnerable adults or where legally required.

6.6 Use of Artificial Intelligence (AI)

Fleet and SEG may use approved AI tools to support:

- Drafting.
- Summarisation.
- Analysis.
- Research.
- Quality assurance.
- Compliance activities.
- Workflow automation.

All AI-generated outputs remain subject to human review.

Fleet applies safeguards including:

- Access controls.
- Data minimisation.
- Staff training.
- Monitoring arrangements.
- Restrictions on non-approved AI platforms.

6.7 Legal Bases for Processing

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

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.

- When you have provided us with consent to process your personal data.

Additional conditions will be applied where special category data or criminal offence data is processed.

6.8 Information Sharing

Fleet may share information with:

- Schools and educational settings.
- Local authorities.
- Former employers and referees.
- Payroll and pension providers.
- Disclosure and Barring Service.
- Teaching Regulation Agency.
- HMRC.
- Occupational health providers.
- Professional advisers.
- IT service providers.
- Audit and accreditation bodies.
- Regulatory and law enforcement agencies.

Information will only be shared where there is a lawful basis for doing so. Information will be provided to those agencies securely and/or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations; we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

6.9 Marketing Communications

Fleet and Supporting Education Group may provide information about services, events, professional development opportunities, training and other relevant communications.

Individuals can opt out of non-essential marketing communications at any time.

Fleet does not permit third-party organisations outside SEG to use educator information for their own marketing purposes.

6.10 Data Retention

Fleet only retains personal information for as long as necessary.

Retention periods may include:

- Recruitment records in accordance with statutory requirements.
- Employment and payroll records in accordance with HMRC requirements.
- Safeguarding records in accordance with statutory guidance.
- Low-level concern records for the engagement period plus six years.
- Harm threshold safeguarding allegation records in accordance with safeguarding retention requirements.

Further information is available within the Data Retention Policy.

6.11 International Transfers

Where information is transferred outside the United Kingdom, Fleet will ensure that appropriate safeguards are implemented and that all transfers comply with applicable legislation.

6.12 Data Security

Fleet implements appropriate technical and organisational measures including:

- Access controls.
- Encryption.
- Secure systems.
- Multi-factor authentication where applicable.
- Security monitoring.
- Staff training.
- Secure disposal procedures.

Personal information is only accessible to authorised individuals with a legitimate business need.

7. Procedures

The following procedures support implementation of this notice:

- Recruitment and Vetting Procedures.
- Safeguarding and Child Protection Procedures.
- Low-Level Concerns Procedures.
- Data Breach Reporting Procedures.
- Subject Access Request Procedures.
- Data Retention Procedures.
- Information Security Procedures.

8. Training and Communication

Fleet provides appropriate training and guidance relating to:

- Data protection.

- Information security.
- Safeguarding.
- Cyber security awareness.
- Appropriate use of AI technologies.

Updates to this notice will be communicated as appropriate.

9. Monitoring and Compliance

Compliance with this Privacy Notice may be monitored through:

- Internal audits.
- Management review.
- Data protection compliance checks.
- Safeguarding audits.
- Quality assurance activities.
- Investigation of incidents and complaints.

10. Non-Compliance

Failure to comply with this Privacy Notice, associated procedures or data protection requirements may result in:

- Investigation.
- Corrective action.
- Additional training.
- Restriction of access to systems.
- Disciplinary action where appropriate.
- Regulatory reporting where legally required.

11. Individual Rights and Complaints

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 feedback@fleeteducationservices.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).

Individuals should contact the Data Protection Officer regarding any requests.

Complaints should first be raised with the Data Protection Officer. Individuals also have the right to complain to the Information Commissioner's Office (ICO).

Right to Withdraw Consent

In the limited 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 feedback@fleeteducationservices.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.

12. Cookies and Website Information

Fleet websites and online services may use cookies and similar technologies to:

- Improve functionality.
- Understand visitor behaviour.
- Support security.
- Improve user experience.
- Assist service development.

Additional information is available within Fleet's Cookie Policy.

Fleet may provide links to external websites. Fleet is not responsible for the privacy practices or content of third-party sites.

13. Review and Document Control

Fleet may update this Privacy Notice from time to time to reflect changes in legislation, guidance, organisational requirements or processing activities.

14. Version Control

Version	Date	Author	Summary of Changes	Approved By	Next Review Date
2.0	September 2026	Head of Compliance	Revised Section 5 to include contact details, updated the contact email address in Section 11, and expanded the information relating to criminal offence data.	Judicium	August 2027