



## Privacy Notice: Pupils, Parents & Carers

### Applewood Learning Limited

Applewood Learning Limited is committed to protecting the privacy and security of your personal information. This privacy notice explains how we collect, use, store and share personal data about our pupils, their parents/carers, and, where relevant, our workforce.

Applewood Learning Limited is the Data Controller for the purposes of UK data protection law (UK GDPR and the Data Protection Act 2018).

#### 1. Our Contact Details

**Name:** Applewood Learning Limited

**Address:** Sticklemead, Main Road, Bicknacre, Essex CM3 4HW

**Phone:** 07907 520710

**Email:** [info@applewoodlearning.co.uk](mailto:info@applewoodlearning.co.uk)

**Website:** [www.applewoodlearning.co.uk](http://www.applewoodlearning.co.uk)

#### Data Protection Contact

Applewood Learning Limited has appointed a Data Protection Lead responsible for overseeing data protection compliance within the provision.

If you have any questions about this privacy notice or how we handle your personal information, please contact:

Data Protection Lead: Carol Brooks

Email: [carol.brooks@applewoodlearning.co.uk](mailto:carol.brooks@applewoodlearning.co.uk)

Telephone: 07907 520710

#### 2. The Personal Data We Collect

We collect and process personal data in order to support pupils, monitor their progress, provide appropriate pastoral care, fulfil safeguarding duties and meet contractual and statutory obligations.

#### Categories of pupil information we collect include:

##### Personal information:

Name, address, contact details, date of birth, identification documentation.

##### Characteristics:

Ethnicity, language, background information relevant to education plans.



**Attendance information:**

Sessions attended, number of absences, reasons for absence.

**Assessment information:**

Internal assessments, progress tracking, external qualification results.

**Medical information:**

Details of medical conditions, physical and mental health needs, care plans relevant to safety.

**Special Educational Needs (SEN):**

EHCPs, applications for support, details of provision received.

**Safeguarding information:**

Information relating to child welfare and protection.

**Behavioural information:**

Records relating to behaviour management and support.

**Photographs:**

Images used for identification, safeguarding or promotional purposes (with explicit consent where required).

We also collect personal data relating to parents/carers/guardians, including names, contact details and relevant contextual information.

### **3. Why We Collect and Use This Information (Lawful Basis)**

We only process personal data where the law allows us to do so.

Depending on the nature of the placement (Local Authority commissioned or privately funded), our lawful basis may include:

- **Legal obligation** – for example, safeguarding duties and child protection responsibilities.
- **Performance of a task carried out in the public interest** – where education provision is arranged by a Local Authority.
- **Contract** – where services are privately commissioned.
- **Legitimate interests** – where processing is necessary for the effective delivery of educational services.
- **Consent** – where required, such as for promotional photographs.

### **Special Category Data**

We process special category data (including health, SEN and safeguarding information) under Article 9 UK GDPR. We rely on additional lawful conditions including:



- Substantial public interest (safeguarding of children and individuals at risk)
- Provision of health or social care
- Compliance with education law obligations

The purposes for processing pupil data include:

- Supporting pupil learning
- Monitoring and reporting progress to commissioning bodies
- Providing pastoral care and safeguarding
- Meeting statutory and contractual reporting requirements
- Assessing and improving the quality of our services

#### 4. Data Sharing

We do not share personal information outside Applewood Learning Limited without consent unless the law permits or requires us to do so.

We may share information with:

**Local Authorities (LA)** – where they commission the placement, to ensure continuity of provision, funding and statutory oversight.

**Health and Social Care professionals** – including the NHS and Children’s Services, where necessary to protect vital interests or provide appropriate care.

**External qualification bodies** – for exam registration and assessment purposes.

#### Use of Tutors as Data Processors

Applewood Learning Limited engages self-employed teachers and tutors to deliver educational services. These individuals process personal data on our behalf. They are contractually bound by a Data Processing Agreement which requires them to:

- Process data only on our instructions
- Maintain confidentiality
- Implement appropriate technical and organisational security measures
- Comply fully with UK GDPR

Data is transferred securely using encrypted systems and secure email where appropriate.

#### 5. Storing Your Data

We store personal data securely using UK-based cloud systems with appropriate access controls.



Devices used by authorised staff and tutors are password protected and encrypted. Multi-Factor Authentication (MFA) is used where available. Paper records, where necessary, are stored securely and disposed of using confidential waste procedures.

We only retain personal data for as long as necessary to fulfil the purposes for which it was collected. We operate a data retention schedule. As a general guide:

- Pupil records are usually retained until the individual reaches the age of 25, in line with safeguarding and education guidance.
- Workforce records are retained in accordance with statutory requirements.

## 6. Your Rights Over Your Data

Under UK GDPR, individuals have the following rights:

- The right to be informed
- The right of access (Subject Access Request)
- The right to rectification
- The right to erasure (in certain circumstances)
- The right to restrict processing
- The right to object
- The right to data portability (where applicable)
- Rights relating to automated decision making and profiling

Where processing is based on consent, consent may be withdrawn at any time.

To exercise any of these rights, please contact our Data Protection Lead using the details above.

## 7. Complaints

We take complaints about the collection and use of personal information very seriously. If you have concerns, please contact us in the first instance so we can resolve the matter.

You also have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)