PRIVACY NOTICE FOR PUPILS

September 2026 – reviewed 29 September 2026 for section 16LA information-sharing duty

Data controller	The Alternative School Group Ltd (TAS)
Registered office	Suite 2B, Ribble Court, Mead Way, Padiham, Burnley, Lancashire, BB12 7NG
Who this notice is for	Current, former and prospective pupils, including children in Evergreen Forest Nursery. For very young or pre-literate children, TAS will provide the full privacy information to parents/carers and will explain relevant privacy information to the child in an age- and development-appropriate way.
Review	Reviewed 29 September 2026 for section 16LA duty; thereafter at least annually and whenever processing materially changes

What this notice means.
TAS uses information about you so that we can provide education, support you, keep you and others safe, meet our responsibilities and run the school. Personal information means information that identifies you or is about you. Some information, such as health, SEND, ethnicity, religion or safeguarding information, needs extra protection.

Early Years Children: Evergreen Forest Nursery children have the same data protection rights as other children. Because children aged 2–4 may be pre-literate or too young to understand a written notice, TAS will make privacy information available to their parents/carers and will use simple, age-appropriate explanations, pictures, conversation or other suitable methods with children where this can support their understanding.

Information we may use about you.

- identity and contact details, date of birth, pupil identifiers and addresses;
- parent/carer and emergency contact information;
- admissions, referral, previous-school and commissioning information;
- attendance, timetable, curriculum, learning, assessment, qualifications, progress and destinations;
- behaviour, rewards, sanctions, pastoral support and risk assessments;
- SEND, EHCP, disability, health, medication, allergies and accessibility information;
- safeguarding, child protection, looked-after-child or previously-looked-after-child information where relevant;
- ethnicity, language, religion and other equality information where lawfully required;
- photographs, video/audio, pupil work and participation in trips/activities;
- IT account, device, network, filtering and monitoring information, including alerts and reports where appropriate;
- communications with you, parents/carers, schools, local authorities, commissioners and professionals;
- accident, first-aid, transport, meal/free-school-meal and funding information where relevant.

Why we use this information and our lawful basis.

Purpose	Examples of information	Main lawful basis	Special-category condition where relevant
Education, assessment, attendance and pupil administration	Identity, attendance, curriculum, progress, qualifications	Legal obligation; contract where relevant; legitimate interests in providing and managing education	Substantial public interest / education-related conditions where applicable
Safeguarding and welfare	Safeguarding, behaviour, risk, family circumstances, health	Legal obligation; vital interests; legitimate interests; public task where a specific statutory function applies	Substantial public interest, safeguarding of children and individuals at risk; health/social care where applicable
SEND, health and accessibility support	SEND, EHCP, disability, health, medication	Legal obligation; legitimate interests; vital interests where necessary	Health/social care; substantial public interest; safeguarding where applicable
Funding, commissioning and statutory/regulatory reporting	Pupil identifiers, attendance, provision, outcomes, funding information	Legal obligation; contract; public task where applicable	Substantial public interest where applicable
Security, IT, filtering and monitoring	Accounts, device/network activity, alerts, security logs	Legal obligation; legitimate interests in safeguarding, security and appropriate use	Substantial public interest/safeguarding where alerts contain sensitive information
Trips, enrichment, communications and school life	Contacts, medical needs, photos/video, participation	Legitimate interests; contract; consent where consent is the appropriate basis	Explicit consent where required for special-category data

Where your information comes from.

We may receive information directly from you and your parent/carer, and from previous or current schools, local authorities and commissioners, health or social-care professionals, safeguarding partners, examination/awarding bodies, government departments, transport providers and other organisations where sharing is lawful and necessary.

Who we may share it with.

- parents/carers where appropriate and lawful, taking account of your rights, competence, confidentiality and safeguarding;
- local authorities, commissioners, DfE and other public bodies where required or permitted;
- other schools/settings when you transfer, including relevant education and safeguarding information;
- children's social care, police, health services, safeguarding partners and other professionals where necessary to protect you or others;
- awarding bodies, careers/destination services and education providers;
- approved IT, MIS, safeguarding, payroll/finance, cloud, communications, filtering/monitoring and other service providers acting under contract;
- insurers, legal advisers, auditors and regulators where necessary.

Safeguarding and the information-sharing duty.

From 30 September 2026, a new safeguarding information-sharing duty in section 16LA of the Children Act 2004 applies to organisations and services that fall within its scope. Where it applies to TAS, we may have a legal duty to share information about you, or information about another person that relates to you, with another relevant safeguarding or welfare organisation or professional. We will share only information that is relevant and where we consider the sharing may help the recipient carry out relevant safeguarding or welfare functions or services. The duty does not require sharing where we consider that sharing would be more harmful to you than not sharing. We will usually be open with you and your family about safeguarding information sharing, but there are situations where telling someone before or after sharing could put you or another person at risk or otherwise be

inappropriate. We do not need your consent where the law permits or requires safeguarding information to be shared.

Filtering, monitoring and school technology.

TAS may filter internet access and monitor school accounts, devices, networks and online activity to protect pupils, meet safeguarding responsibilities, maintain security and support acceptable use. Access to alerts and reports is restricted to authorised staff and relevant IT support. Monitoring information is kept only for a proportionate period unless it becomes part of a safeguarding, disciplinary, security or legal record. TAS will assess new or significantly changed monitoring technology through a DPIA before use.

AI and automated decisions.

Staff must only use approved AI or automated tools with personal information. TAS will assess privacy and safeguarding risks before introducing significant AI uses. This notice does not identify any routine TAS process in which a decision with legal or similarly significant effects is made about a pupil solely by automated means. If that changes, TAS will provide specific information about the decision, safeguards and rights before the processing begins.

Photos, video and publicity.

TAS may take photographs or recordings for education, safeguarding, identification, evidence of learning and internal school purposes where this is necessary and proportionate. Where images are used for optional publicity, promotional or similar purposes, TAS will use the appropriate lawful basis and seek consent where required. Consent can be withdrawn for future use.

Your choices and questions.

Your information belongs to you in the sense that data protection rights are your rights, even where an adult helps you exercise them. You can ask what information TAS holds about you and ask for inaccurate information to be corrected. If you do not understand this notice, ask a member of staff, your parent/carer or the DPL to explain it in a way that works for you.

How long we keep information.

TAS keeps personal information only for as long as it is needed for the purpose for which it is used, and to meet legal, safeguarding, contractual, insurance, audit or regulatory requirements. Detailed periods are set out in the TAS Records Retention Schedule. Where a legal hold, safeguarding concern, complaint, claim, investigation or regulatory requirement applies, relevant records may be retained for longer and the reason will be documented.

International transfers.

TAS aims to use UK-based processing where appropriate. Some approved cloud, software or support providers may process or allow access to personal information outside the UK. Where this happens, TAS will ensure that a lawful transfer mechanism and appropriate safeguards are in place, such as UK adequacy regulations or approved contractual safeguards. Further information can be requested from the DPL.

Your data protection rights.

Depending on the circumstances and lawful basis, you may have rights to be informed; obtain access to personal information; correct inaccurate information; request erasure; restrict processing; object to processing; receive certain information in a portable format; and obtain safeguards in relation to automated decision-making. Not every right applies to every use of information.

Where TAS relies on consent, consent can be withdrawn at any time. Withdrawal does not affect processing that was lawful before consent was withdrawn. To exercise a right, contact the DPL. TAS may need to verify identity or authority before acting on a request.

RIGHT TO OBJECT: Where TAS relies on legitimate interests, you have the right to object to that processing. TAS will consider the objection and whether there are compelling legitimate grounds to continue. You also have an absolute right to object to direct marketing.

Data protection complaints.

Please raise data protection concerns with the DPL at heather@thealternativeschool.co.uk. TAS will provide a clear route for complaints, acknowledge a data protection complaint within 30 days, investigate it appropriately, keep the complainant informed and communicate the outcome without undue delay. You may also complain to the Information Commissioner's Office (ICO).

Information Commissioner's Office: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF | Telephone: 0303 123 1113 | Website: ico.org.uk

Changes to this notice.

TAS reviews privacy information at least annually and before significant new uses of personal information begin. Material changes will be brought to affected people's attention in an appropriate and accessible way.

Regulatory basis.

- Children Act 2004, section 16LA (inserted by the Children's Wellbeing and Schools Act 2026) – Information Sharing Duty effective 30 September 2026.
- Department for Education, Information sharing to safeguard children and young people – statutory guidance updated 10 September 2026.
- UK General Data Protection Regulation (UK GDPR), including Articles 5, 6, 9, 13 and 14.
- Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.
- Department for Education privacy notice guidance and model notices for the 2026 to 2027 academic year.
- Department for Education Data protection in schools' guidance, updated July 2026.
- Information Commissioner's Office guidance on transparency, children's information and data protection complaints.