PRIVACY NOTICE FOR STAFF

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	Employees, workers, casual staff, agency staff and former members of the workforce. Job applicants should receive a separate recruitment privacy notice.
Review	Reviewed 29 September 2026 for section 16LA duty; thereafter at least annually and whenever processing materially changes

Information we may use about you

- identity, contact, emergency contact and right-to-work information;
- recruitment, qualifications, employment history, references and safer-recruitment checks;
- DBS/check status and relevant criminal-offence information where lawfully processed;
- contract, role, location, hours, attendance, leave and working arrangements;
- pay, tax, National Insurance, bank, pension, benefits and expenses;
- performance, appraisal, training, CPD, capability, conduct, grievance and disciplinary information;
- health, disability, occupational-health, sickness and reasonable-adjustment information;
- equality-monitoring information;
- safeguarding allegations/concerns and low-level concerns where applicable;
- IT account, email, device/network, access, security, filtering/monitoring and audit-log information;
- photographs, CCTV where used, communications and records of work;
- trade-union information where relevant and lawfully processed.

Why we use your information and our lawful basis

Purpose	Examples of information	Main lawful basis	Special-category condition where relevant
Recruitment, employment and workforce administration	Identity, qualifications, contract, attendance, performance	Contract; legal obligation; legitimate interests	Employment/social protection; substantial public interest where applicable
Safer recruitment and safeguarding	DBS/check status, references, safeguarding records	Legal obligation; legitimate interests; public task where	Employment/social protection; safeguarding; criminal-

		applicable	offence conditions under DPA 2018
Pay, tax, pension and benefits	Payroll, bank, NI, pension, leave	Contract; legal obligation	Employment/social protection where relevant
Health, absence and adjustments	Health, disability, occupational health	Legal obligation; contract; legitimate interests	Employment/social protection; health/occupational medicine
Performance, training, conduct and legal claims	Appraisals, training, investigations, correspondence	Contract; legitimate interests; legal obligation	Employment/social protection; legal claims where applicable
IT security, filtering/monitoring and premises security	Accounts, logs, communications metadata, alerts, CCTV if used	Legitimate interests; legal obligation	Substantial public interest/safeguarding where relevant

Where we get your information
From you and from recruitment agencies, referees, previous employers, DBS and other vetting services, professional bodies, DfE/public bodies, HMRC, pension/payroll providers, occupational-health or medical professionals, training providers, TAS managers and systems, and safeguarding/regulatory bodies where lawful.

Who we may share it with

- HMRC, pension providers and payroll/benefit providers;
- DfE, local authorities/commissioners and regulators where required or permitted;
- DBS, professional/regulatory bodies and safeguarding authorities;
- occupational health, healthcare providers and insurers where appropriate;
- approved HR, payroll, IT/cloud, communications, training and other processors;
- auditors, accountants, banks, legal advisers and insurers;
- police, courts, safeguarding partners or other public authorities where necessary and lawful.

Safeguarding and the information-sharing duty
Safeguarding information may include personal information about an adult where that information relates to a child. From 30 September 2026, where TAS is within scope of section 16LA of the Children Act 2004, relevant and proportionate staff information may therefore be disclosed to another relevant person where the statutory safeguarding/welfare test is met. The statutory duty does not apply where TAS considers disclosure would be more detrimental to the child than non-disclosure. Consent is not required where another lawful basis or legal duty permits or requires the sharing.

Monitoring, IT and communications

TAS may monitor use of its systems, accounts, devices, networks and premises where necessary and proportionate for safeguarding, security, compliance, service management and investigation of suspected misuse. Filtering and monitoring may generate alerts or reports accessible to authorised staff and relevant IT support. TAS will provide more specific information where a particular form of monitoring requires it and will complete a DPIA before introducing high-risk or significantly changed monitoring.

AI and automated decision-making
Staff must use only approved AI tools for work involving TAS information. Personal or confidential data must not be entered into unauthorised AI services. This notice does not identify any routine TAS

employment decision with legal or similarly significant effects made solely by automated means. TAS will provide specific information and safeguards before introducing such processing.

Providing information
Much workforce information is required to enter into or perform the employment relationship, meet safer-recruitment, safeguarding, tax, employment and regulatory obligations, or administer pay and benefits. Failure to provide necessary information may prevent TAS from employing, paying or safely deploying an individual. Optional information will be identified as such.

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.