



# | PUPIL & PARENT/CARER PRIVACY NOTICE (UK GDPR)

## Who we are and how to contact us

- **Controller: 1st Staff Limited** (when we deliver services directly to families or under our own contract).
- **Processor:** When we deliver on behalf of your **school/local authority (LA)**, that school/LA is the **controller** and we act as **processor** under a Data Processing Agreement.
- **Contact (data protection): Data Protection Officer (DPO),**  
[louis@1ststaff.co.uk](mailto:louis@1ststaff.co.uk), 1<sup>st</sup> Staff, Civic Building, 323 High Street, CM16 4BZ Epping.
- **Complaints:** You can complain to our DPO. You can also complain to the **ICO** at [ico.org.uk](https://ico.org.uk) or 0303 123 1113.

## What personal data we collect

- **Identity & contact:** name, address, DOB, parent/carer details, unique IDs.
- **Education:** baseline/diagnostic results, PLPs/ILPs, curriculum records, attendance, reviews.
- **Safeguarding & wellbeing:** concerns, case notes, multi-agency referrals (where needed).
- **Medical/needs:** healthcare plans, allergies, access arrangements evidence (where relevant).
- **Behaviour & incidents:** incident logs, exclusions/suspensions, sanctions/restoratives.
- **Assessment & exams:** entries, scripts, results, access arrangements, post-results.



- **Technology:** platform usage (Teams/MIS), IP/device metadata, recordings only where explicitly approved (recording is off by default).
- **Visit information:** risk assessments, parental consents, emergency contacts.

## Why we use your data and our lawful bases

Purpose	Our lawful basis (UK GDPR/ DPA 2018)
Delivering tuition, support and reviews	<b>Public task</b> (commissioned education) or <b>legitimate interests</b> (direct contracts)
Safeguarding & child protection	<b>Vital interests / legal obligation / public task</b>
Managing attendance/CME	<b>Public task</b>
Access arrangements & exams administration	<b>Public task / legitimate interests</b> ; some awarding-body rules require <b>consent</b> for specific evidence uses
Special category data (health, SEND)	<b>Substantial public interest / health/social care / vital interests</b>
Educational visits	<b>Public task / legitimate interests</b> ; <b>consent</b> for specific activities/photos where required
Communications with parents/carers/commissioners	<b>Public task / legitimate interests</b>
Marketing (non-service updates)	<b>Consent</b> (you can withdraw any time)

Where we act as **processor** for your school/LA, we follow the controller's lawful bases and their privacy notice.



## Where we get your data

You, your parent/carer, your school/LA, previous providers, professionals involved in your care, awarding bodies, and our teaching platforms.

## Who we share with (only when necessary)

Your school/LA/commissioner, tutors and managers, safeguarding partners (e.g., MASH/Police/Health), awarding bodies/exam service providers, EdTech platforms approved for teaching, venues/hubs for visit administration, and regulators/ombudsmen where required by law. We do **not** sell your data.

## International transfers

We store data primarily in the UK/EEA Microsoft tenancy. If a provider stores or accesses data outside the UK/EEA, we ensure **UK adequacy** or **appropriate safeguards** (e.g., IDTA/SCCs).

## How long we keep data

We keep data only as long as needed. Key examples:

- **Safeguarding:** until the person is **25** (or longer if required).
- **Education/assessment:** typically **7 years** after placement end; **Access Arrangements** evidence **≥26 months**; exam records **3 years** (or awarding-body minima).

Full details are in our **Records Management & Retention Schedule**.

## Your rights

You can ask us for a copy of your data, to correct it, to limit or object to processing, or to delete it (where applicable). You can also ask about transfers and automated



decisions. Some rights may be limited by safeguarding or legal requirements. To exercise rights, contact the **DPO**.

## Children's consent and parental responsibility

Where we rely on **consent** (e.g., marketing or specific photos), we seek consent from the **child** if competent; otherwise from the person with **parental responsibility**. Consent can be withdrawn at any time.

## Contact & concerns

Questions or concerns? Contact our **DPO** at [louis@1ststaff.co.uk](mailto:louis@1ststaff.co.uk). If unresolved, contact the **ICO** ([ico.org.uk](https://ico.org.uk)).