Pathways School

Privacy Policy

Policy Monitoring

Date policy last reviewed: April 2026

Signed by:

Neil Jones	Headteacher	Date:	April 2026
Saima Ali	Chair of governors	Date:	April 2026

Date of next review: April 2027

This policy will be reviewed at least annually and following any concerns and/or updates to national/local guidance or procedure.

1. Introduction

Pathways School is committed to protecting and respecting the personal data that we hold. This privacy statement explains how we collect, use and protect personal data, and outlines individuals' rights in relation to that data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, we are committed to transparency and will ensure that individuals understand how their information is used.

We recognise that children's personal data requires a higher level of protection, and we ensure that all processing involving children is carried out with particular care and in accordance with data protection law.

2. Lawful Basis for Processing (NEW SECTION – add after Introduction)

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The lawful bases we rely on include:

- **Public task** – to carry out our role as a school and deliver education
- **Legal obligation** – to comply with safeguarding, SEND and other statutory duties
- **Vital interests** – where processing is necessary to protect a child's safety
- **Consent** – where required (e.g. marketing communications, use of images)

Where we process **special category data** (e.g. health, ethnicity, religion), we rely on:

- Substantial public interest (including safeguarding)
- Legal obligations relating to education
- Explicit consent, where appropriate

3. Security

We take the security of all the data we hold seriously. Staff are trained on data protection, confidentiality, and security. We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure. All the information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted online. However, once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We also ensure that appropriate technical and organisational measures are in place to protect personal data, including access controls, encryption where appropriate, and regular review of our security arrangements.

4. Data that we hold

As a school we provide services to individuals as well as organisations. Where we engage with individuals, we may collect and process personal data in order to assess the needs of a student and their parent(s)/carer(s). We will only ask for personal data that is required for us to fulfil our contractual or operational obligations.

Why do we process this data?

Where data is collected for admission to school, it is used for a number of purposes, as follows;

- Delivery of service
- Training
- Administration
- Fundraising and Marketing

3.1 Delivery of Service

- **Admission**: We may process your data if you have enquired about the school, have a son/daughter at our school, or if you are planning on sending your son/daughter to our school. If applying to join Pathways School, we may process your data and that of your son/daughter to assess your application, and if successful, to grant admission. If your son/daughter is currently attending Pathways, we will process your data throughout the duration of their attendance, and to provide you appropriate support.
- **Promotion of services:** we may also process your data to offer you information, courses or other services we feel may be applicable to you.
- **Individual needs**: When communicating with and assessing the needs of the individual and the parent(s)/carer(s), personal data may be processed in order to ensure that we are appropriately satisfying their needs.
- **Administration:** In order to manage and administer our business, we may collect and process personal data. This may include (but is not limited to) maintaining internal records of the individual and maintaining internal safeguarding processes.
- **Regulatory:** For us to carry out our role, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements. This may include (but is not limited to) the verification of identity of individuals.

4.1.1. What data is processed?

- **Services to customers:** Individual's names, date of birth, address, medical history, questionnaires, consent forms, unique pupil number, religion, ethnicity, siblings' data.
- **Parent / Carer / Power of Attorney:** Emergency contacts, names, legal guardians and power of attorneys, criminal cases, marital status, financial data, religion, ethnicity, and

data captured from other third parties.

- **Local authorities**: Names, email, contact details, job titles.

4.1.2. How long do we hold data for?

We retain personal data only for as long as necessary for the purposes for which it was collected, in line with legal, regulatory and operational requirements.

We follow a **data retention schedule**, based on guidance from the Information and Records Management Society (IRMS), which sets out how long different types of data must be kept. For example:

- Pupil educational records are typically retained until the pupil reaches the age of 25
- Safeguarding records are retained in line with statutory requirements
- Attendance registers are retained for a minimum of 6 years

We regularly review retained data to ensure it remains relevant and necessary.

4.2. Training

We collect and process personal data about those involved in our training – this includes parents, carers and professionals within the industry. The data is held to provide you with training, to manage the relationship, and to ensure your needs are fulfilled.

4.2.1. Why do we process this data?

Complying with any requirement of law: we are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

Administration: In order to manage and administer our business and these services, we may collect and process personal data.

4.2.2. What data do we hold?

We will hold names, email address, contact details, addresses, photos, and videos where consent has been given.

4.2.3. How long do we hold this data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights. We will periodically review this data, to ensure that it is still relevant and necessary.

4.3. Fundraising and marketing

We process personal data for fundraising and marketing purposes. We will only process personal data for marketing purposes where we have **explicit consent** or where we are otherwise legally permitted to do so.

4.3.1. Why do we process this data?

We have different ways we carry out fundraising and marketing. This includes:

- Receiving donations and raising awareness on how to donate to us
- Requesting Gift Aid to enhance donations where applicable
- Events – if you registered or expressed an interest in attending one of our events
- Charity news – if you registered to hear about the charity and the work we are doing

4.3.2. What data do we hold?

We will hold names, email addresses, contact details, addresses, photos, and videos where consent has been given.

4.3.3. How long do we hold this data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights. We will periodically review this data to ensure that it is still relevant and necessary.

5. People who use our website

Personal data may be collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail, or otherwise. This includes information provided when an individual registers to use our websites, subscribe to our services, or make an enquiry.

Individual services on our website may ask you to set cookies to remember you on this device. You don't need to accept these cookies for the services to work, and you can delete them at any time.

We use analytics tools (such as Google Analytics) to help us understand how visitors use our website. These tools may collect limited personal data, such as IP address and browsing behaviour. This information helps us improve websites and user experience. Users can control cookies and track them through their browser settings.

6. Use of Technology and AI (NEW SECTION – add before “Sharing personal data”)

We use digital systems and educational technologies to support teaching, learning, and administrative functions.

Where we use technology that involves automated processing or artificial intelligence (AI):

- Appropriate safeguards are in place
- Decisions are subject to human oversight
- Individuals have the right to request human review of significant decisions

We ensure that all third-party systems used by the school comply with data protection law.

7. Sharing personal data

We will only share personal data with others when we are legally permitted and/or obliged to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality, and security standards.

Personal data held by us may be transferred to:

- Local Authorities – we may share data with a local authority, when we have your consent. We may also be required to share data to prove that we are using the funds they have given us for the purposes agreed contractually.
- Health Care Professionals – we will share data with professionals (e.g. NHS, CAMHS) who may provide ongoing assistance and support.
- Social workers – we will share data with social workers who will be providing ongoing assistance and support.
- External course leaders, agency staff and volunteers – we will share data with external course leaders who we will assign to deliver a service on our behalf that you have chosen to attend.

We use third parties to support us in providing our services and to help provide, run and manage our internal database.

We may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulations.

Where we have any safeguarding concerns, we are permitted under GDPR to disclose personal data to the relevant authorities without the consent of the data subject.

All data sharing is carried out in accordance with data protection law and is limited to what is necessary and proportionate.

8. Locations of processing

The data that we collect from you may be transferred to and stored within a cloud-based system. By submitting your personal data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in

accordance with this Privacy Policy.

9. Individual's rights

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals can request access to their personal data held by us as a data controller.
- Individuals can request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals can request that we erase their personal data.
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals can request information about any automated data processing that we may undertake.

If you wish to exercise any of these rights, send an email to:

Saima Ali Majid, Chair, Board of Governors

saima.ali@pbslpathways.org.uk

Further information about these rights is available from the Information Commissioner's Office (ICO).

10. Complaints

We hope that you will not need to, but if you wish to complain about how we use personal data, please contact us using the details below.

We will:

- Acknowledge your complaint promptly
- Investigate your concerns
- Respond within a reasonable timeframe (normally within one month)

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO): https://ico.org.uk/concerns

11. Data controller and contact information

The data controller for Pathways School is Saima Ali Chair of Governors. If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

saima.ali@pbslpathways.org.uk

Data Protection Officer (or responsible lead):