



## **Prime8 Education**

### **How we use student information?**

**The categories of student information that we collect, hold and share include:**

- Personal information – e.g., names, numbers, and addresses
- Characteristics – e.g., ethnicity, language, nationality, country of birth and free provision meal eligibility
- Attendance information – e.g., number of absences and absence reasons
- Assessment information – e.g., national curriculum assessment results
- Relevant medical information
- Information relating to SEND
- Behavioural information

### **Why we collect and use this information**

We collect and use personal data to meet legal requirements and legitimate interests set out in the GDPR (General Data Protection Regulation) and UK law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
- In accordance with the above, the personal data of students and their families is collected and used for the following reasons:
  - to support student learning
  - to monitor and report on progress
  - to provide appropriate pastoral care
  - to assess the quality of Prime 8 services
  - to comply with the law regarding data sharing
  - to inform professionals of student progress.

### **How long is your data stored for?**

Personal data relating to students and their families is stored in line with the provision's Data Protection Policy.

In accordance with the GDPR, the provision does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

### **Where is data held**

Data is stored using online systems: Office 365 (SharePoint); any paper copies are stored in a secure unit in an alarmed building.

### **Who we share data with?**

All staff members can access student's data; accessing by using work emails. We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We share student's data with professionals that are involved with the student; Department for Education (DfE) on a statutory basis; provisions and LA (Local Authority). This data sharing underpins provisions funding and educational attainment policy and monitoring.

## Data held outside the company

Prime8 shares weekly lesson logs, termly reports and any relevant data with professionals who are involved with the student.

## What are your rights?

Parents/carers and students have the following rights in relation to the processing of their personal data.

You have the right to:

- Be informed about how Prime 8 uses your personal data.
- Request access to the personal data that Prime 8 holds.
- Request that your personal data is amended if it is inaccurate or incomplete.
- Request that your personal data is erased where there is no compelling reason for its continued
- Request that the processing of your data is restricted.
- Object to your personal data being processed.
- Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way Prime8 are collecting or using your personal data, you should raise your concern with Prime 8 in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## The lawful basis on which we use this information

We collect and use student information under Education Act 1996; Education (Information about Children in Alternative Provision); (England) Regulations 2007; Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013; the education or training of 13-19-year olds under section 507B of the Education Act 1996; Protection of Freedoms Act 2012 and GDPR: Article (10), Article (17)(3)(a), Article (17)(3)(b), Article (17)(3)(c), Article (17)(3)(d), Article (17)(3)(e), Article

(18)(2), Article (22)(2)(a), Article (22)(2)(b), Article (22)(2)(c), Article (5)(1)(a), Article (6)(1)(a), Article (6)(1)(b), Article (6)(1)(c), Article (6)(1)(d), Article (6)(1)(e), Article (6)(1)(f), Article (6)(3), Article (9)(1), Article (9)(2)(b), Article (9)(2)(c), Article (9)(2)(d), Article (9)(2)(e), Article (9)(2)(f), Article (9)(2)(g), Article (9)(2)(h), Article (9)(2)(i), Article (9)(2)(j), Article (9)(3), Article (9)(4)

## Contact:

If you would like to discuss anything in this privacy notice, please contact: Julie Townsend – Director

## How we use children in need and children looked after information?

### The categories of student information that we collect, hold and share include:

- Personal information – e.g., names, numbers, and addresses
- Characteristics – e.g., ethnicity, language, nationality, country of birth and free provision meal eligibility
- Attendance information – e.g., number of absences and absence reasons

- Assessment information – e.g., national curriculum assessment results
- Relevant medical information
- Information relating to SEND
- Behavioural information –
- information relating to episodes of being a child in need (such as referral information, assessment information, Section 47 information, Initial Child Protection information and Child Protection Plan information)
- episodes of being looked after (such as important dates, information on placements)
- outcomes for looked after children (such as whether health and dental assessments are up to date, strengths and difficulties questionnaire scores and offending)
- adoptions (such as dates of key court orders and decisions)
- care leavers (such as their activity and what type of accommodation they have)

### Why we collect and use this information?

Prime 8 collect and use personal data to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
- In accordance with the above, the personal data of students and their families is collected and used for the following reasons:
  - to support pupil learning
  - to monitor and report on pupil progress
  - to provide appropriate pastoral care
  - to assess the quality of our services
  - to comply with the law regarding data sharing
  - to inform professional of student progress.

### Collecting this information

Whilst most children looked after information provided is mandatory, some of it is provided on a voluntary basis. To comply with the data protection legislation, Prime 8 will inform you whether you are required to provide certain information to us or if you have a choice in this.

### How long is your data stored for?

Personal data relating to students and their families is stored in line with the provision's GDPR Data Protection Policy. In accordance with the GDPR, the provision does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

### Where is data held

Data is stored using online systems: Office 365 (SharePoint); any paper copies are stored in a secure unit in an alarmed building.

### Who we share this information with?

All staff members can access student's data. Prime 8 do not share information about students with anyone without consent unless the law and our policies allow Prime 8 to do so.

Prime 8 share students' data with professionals that are involved with the students; Department for Education (DfE) on a statutory basis; provisions and LA. This data sharing underpins provisions funding and educational attainment policy and monitoring.

## Data collection requirements

To find out more about the data collection requirements placed on Provisions by the Department for Education go to:  
Children looked after: <https://www.gov.uk/guidance/children-looked-after>  
<https://www.gov.uk/guidance/children-looked-after-return> or Children in need: <https://www.gov.uk/guidance/children-in-need-census>

## Data held outside the company

Prime8 shares weekly lesson logs, termly reports and any relevant data with professionals who are involved with the student.

## What are your rights?

Parents/carers and students have the following rights in relation to the processing of their personal data. You have the right to:

- Be informed about how Prime8 uses your personal data.
- Request access to the personal data that Prime 8 holds.
- Request that your personal data is amended if it is inaccurate or incomplete.
- Request that your personal data is erased where there is no compelling reason for its continued
- Request that the processing of your data is restricted.
- Object to your personal data being processed.
- Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way Prime8 are collecting or using your personal data, you should raise your concern with Prime8 in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## The lawful basis on which we use this information

Prime8 collect and use pupil information under Education Act 1996; Education (Information about Children in Alternative Provision); (England) Regulations 2007; Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013; the education or training of 13-19-year olds under section 507B of the Education Act 1996; Protection of Freedoms Act 2012 and GDPR: Article (10), Article (17)(3)(a), Article (17)(3)(b), Article (17)(3)(c), Article (17)(3)(d), Article (17)(3)(e), Article (18)(2), Article (22)(2)(a), Article (22)(2)(b), Article (22)(2)(c), Article (5)(1)(a), Article (6)(1)(a), Article (6)(1)(b), Article (6)(1)(c), Article (6)(1)(d), Article (6)(1)(e), Article (6)(1)(f), Article (6)(3), Article (9)(1), Article (9)(2)(b), Article (9)(2)(c), Article (9)(2)(d), Article (9)(2)(e), Article (9)(2)(f), Article (9)(2)(g), Article (9)(2)(h), Article (9)(2)(i), Article (9)(2)(j), Article (9)(3), Article (9)(4)

## Contact:

If you would like to discuss anything in this privacy notice, please contact: Julie Townsend – Director

## How we use Provision workforce information?

The categories of provision workforce information that we collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number)

- special categories of data including characteristics information such as age, ethnic group
- contract information (such as start dates, hours worked, post, roles, and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)

## Why we collect and use this information?

Prime8 use provision workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid

## The lawful basis on which we process this information

We process this information under Protection of Freedoms Act 2012 and GDPR: Article (10), Article (17)(3)(a), Article (17)(3)(b), Article (17)(3)(c), Article (17)(3)(d), Article (17)(3)(e), Article (18)(2), Article (22)(2)(a), Article (22)(2)(b), Article (22)(2)(c), Article (5)(1)(a), Article (6)(1)(a), Article (6)(1)(b), Article (6)(1)(c), Article (6)(1)(d), Article (6)(1)(e), Article (6)(1)(f), Article (6)(3), Article (9)(1), Article (9)(2)(b), Article (9)(2)(c), Article (9)(2)(d), Article (9)(2)(e), Article (9)(2)(f), Article (9)(2)(g), Article (9)(2)(h), Article (9)(2)(i), Article (9)(2)(j), Article (9)(3), Article (9)(4).

## Collecting this information

Whilst the majority of information staff provide is mandatory, some of it is provided on a voluntary basis. To comply with data protection legislation, Prime8 will inform you whether you are required to provide certain provision workforce information to Prime8 or if there is a choice in this.

## Storing this information

In accordance with the GDPR, the provision does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

## Who we share this information with

Prime8 routinely share this information with:

- the local authority
- the Department for Education (DfE)
- provisions
- Finance and pensions

## Why we share provision workforce information?

Prime8 do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

### **Department for Education (DfE) / provisions**

Prime8 share personal data with the Department for Education (DfE) / provisions on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to provision funding / expenditure and the assessment educational attainment.

## Data collection requirements

The DfE collects and processes personal data relating to those employed by provisions (including Multi Academy Trusts) and local authorities that work in state funded provisions (including all maintained provisions, all academies and free provisions and all special provisions including Pupil Referral Units and Alternative Provision). All state funded provisions are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-provisions>.

The department may share information about provision employees with third parties who promote the education or well-being of children or the effective deployment of provision staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice, or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE / provisions releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to provision workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data> To contact the department: <https://www.gov.uk/contact-dfe>

### Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that Prime8 hold. To make a request for your personal information, contact Director – Julie Townsend.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased, or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way Prime8 are collecting or using your personal data, Prime 8 ask that you raise your concern in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### Contact:

If you would like to discuss anything in this privacy notice, please contact: Julie Townsend – Director

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|----------------------|-------------|-------------------------------------------------------------------------------------------------------------------------|
| Date of Completion   | 1.9.25      | Signed: <br>Debbie Crookes (Tutor)    |
| Date of Ratification | 1.9.2025    | Signed: <br>Julie Townsend (Director) |
| Date of Review       | July 2026   |                                                                                                                         |
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