

Date written/reviewed:	20 th May 2026 (reviewed)	
Written/reviewed by:	Gill Viner (Director of Operations)	
Board approval:	Date:	22 nd May 2023
	Signed:	
	Position:	Trustee
Review due by:	20 th May 2027	
Table of contents:	1 Privacy notice for parents/Carers <i>1.1 The personal data we hold</i> <i>1.2 Our legal basis for using this data</i> <i>1.3 Collecting this information</i> <i>1.4 How we store this data</i> <i>1.5 Data sharing</i> <i>1.6 Transferring data internationally</i> <i>1.7 Parents'/carers' and students' rights regarding personal data</i> <i>1.8 Other rights</i> <i>1.9 Complaints</i> <i>1.10 Contact us</i> 2 Privacy notice for young people <i>2.1 The personal data we hold</i> <i>2.2 Why we use this data</i> <i>2.3 Our legal basis for using this data</i> <i>2.4 Collecting this information</i> <i>2.5 How we store this data</i> <i>2.6 Data sharing</i> <i>2.7 Transferring data internationally</i> <i>2.8 Your rights</i> <i>2.9 Your other rights over your data</i> <i>2.10 Complaints</i> <i>2.11 Contact us</i> 3 Privacy notice for staff <i>3.1 The personal data we hold</i> <i>3.2 Why we collect and use this data</i>	

	<i>3.3 Our lawful basis for using this data</i> <i>3.4 Collecting this information</i> <i>3.5 How we store this data</i> <i>3.6 Data sharing</i> <i>3.7 Transferring data internationally</i> <i>3.8 Your rights</i> <i>3.9 Complaints</i> <i>3.10 Contact us</i> 4 Privacy notice for supporters <i>4.1 The personal data we hold</i> <i>4.2 Why we collect and use this data</i> <i>4.3 Our lawful basis for using this data</i> <i>4.4 How we store this data</i> <i>4.5 Data sharing</i> <i>4.6 Your rights</i> <i>4.7 Complaints</i> <i>4.8 Website cookies</i> <i>4.9 Contact us</i>
Substantive changes since last review:	N/A

Privacy Notice

1 Privacy notice for parents/carers

Under UK GDPR and Data Protection Act 2018, individuals have a right to be informed about how Acorn Alternative Provision uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about your child.

We, Acorn Alternative Provision, are the 'data controller' for the purposes of UK GDPR and Data Protection Act 2018. This notice will be reviewed to ensure continued compliance with UK GDPR, the Data Protection Act 2018 and any subsequent amendments to UK data protection legislation.

Our data protection officer is Gill Viner (see 'Contact us' below).

1.1 The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about your child includes, but is not restricted to;

- contact details, date of birth,
- contact details for parents/carers and emergency contacts
- results of internal assessments and externally set tests
- curricular records
- characteristics, such as: ethnic background, eligibility for free school meals or special educational needs
- exclusion information
- details of any medical conditions, including physical and mental health
- attendance information
- safeguarding information
- details of any support received, including care packages, plans and support providers
- photographs
- CCTV images captured in the Centre.

We may also hold data about your child that we have received from other organisations, including schools, local authorities and the Department for Education.

We use this data to:

- support learning
- monitor and report on progress
- provide appropriate pastoral care
- protect welfare
- assess the quality of our services
- administer admissions

- comply with the law regarding data sharing

1.2 Our legal basis for using this data

We only collect and use your child's personal data when the law allows us to.

Most commonly, we process it where:

- we need to comply with a legal obligation
- we need it to perform an official task in the public interest.

Less commonly, we may also process your child's personal data in situations where:

- we have obtained consent to use it in a certain way
- we need to protect the individual's vital interests (or someone else's interests).

Where we have obtained consent to use your child's personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using your child's personal data overlap; there may be several grounds which justify our use of this data.

1.3 Collecting this information

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of noncompliance.

1.4 How we store this data

We keep personal information about your child while they are attending our Centre. We may also keep it beyond their attendance at our Centre if this is necessary in order to comply with our legal obligations. Please refer to our Records Management Policy, which can be found on our website.

1.5 Data sharing

We do not share information about your child with any third party, without consent unless, the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with UK GDPR and Data Protection Act 2018), we may share personal information about your child with:

- our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- the Department for Education
- the child's family and representatives
- educators and examining bodies
- regulators, e.g. Ofsted

- suppliers and service providers: to enable them to provide the service we have contracted them for
- financial organisations, e.g. funders
- central and local government
- our auditors
- survey and research organisations
- health authorities
- health and social welfare organisations
- charities and voluntary organisations
- professional advisers and consultants
- police forces, courts, tribunals
- support staff from the Church our Centre partners with: to enable them to let you know about support services for you and your family.

1.6 Transferring data internationally

Where we transfer personal data outside the United Kingdom, we will do so in accordance with UK GDPR and the Data Protection Act 2018.

1.7 Parents'/carers' and children's' rights regarding personal data

Individuals have a right to make a 'subject access request' to gain access to personal information that the Centre holds about them. Parents/carers can make a request with respect to their child's data, where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent. Parents/carers also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- give you a description of it
- tell you why we are holding and processing it, and how long we will keep it for
- explain where we got it from, if not from you or your child
- tell you who it has been, or will be, shared with
- let you know whether any automated decision-making is being applied to the data (and any consequences of this)
- give you a copy of the information in an intelligible form.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact our data protection officer.

1.8 Other rights

Under UK GDPR and Data Protection Act 2018, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- object to the use of personal data if it would cause, or is causing, damage or distress
- prevent it being used to send direct marketing
- object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact our data protection officer.

1.9 Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection, or use of personal information, is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance. To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113
- or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

1.10 Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Gill Viner

Data Protection Officer

Acorn Alternative Provision

11 Nab Wood Terrace

Bradford

BD18 4HU.

2 Privacy notice for young people

You have a legal right to be informed about how our Centre uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you when we are processing your personal data. This privacy notice explains how we collect, store and use personal data about you.

We, Acorn Alternative Provision, are the 'data controller' for the purposes of UK GDPR and Data Protection Act 2018.

Our data protection officer is Gill Viner (see 'Contact us' below).

2.1 The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school. For the same reasons, we get information about you from some other places too, such as: other schools you have attended, the local council and the government.

This information includes:

- your contact details
- your test results
- your attendance records
- your characteristics, such as: your ethnic background or any special educational needs
- any medical conditions you have
- details of any behaviour issues or exclusions
- photographs
- CCTV images.

2.2 Why we use this data

We use this data to help run the Centre, including to:

- get in touch with you and your parents/carers when we need to
- check how you are doing and work out whether you or your teachers/tutors need any extra help
- track how well the Centre, as a whole, is performing
- look after your wellbeing.

2.3 Our legal basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- we need to comply with the law
- we need to use it to carry out a task in the public interest (in order to provide you with an education).

Sometimes, we may also use your personal information where:

- you, or your parents/carers have given us permission to use it in a certain way
- we need to protect your interests (or someone else's interest)
- we have received permission to use your data, you or your parents/carers may withdraw this at any time.

We will make this clear when we ask for permission, and explain how to go about withdrawing consent

Some of the reasons listed above for collecting and using your information overlap; and there may be several grounds which mean we can use your data.

2.4 Collecting this information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it is optional. If you must provide the data, we will explain what might happen if you do not.

2.5 How we store this data

We will keep personal information about you while you are a student at our Centre. We may also keep it after you have left the Centre, where we are required to by law. For guidance on how long we keep different types of personal data, please refer to our Records Management Policy, which can be found on our website.

2.6 Data sharing

We do not share personal information about you with anyone outside Acorn Alternative Provision without permission from you or your parents/carers, unless the law and our policies allow us to do so. Where it is legally required, or necessary for another reason allowed under UK GDPR and Data Protection Act 2018, we may share personal information about you with:

- our local authority: to meet our legal duties to share certain information with it, such as concerns about young people's safety and exclusions
- the Department for Education (a government department)
- your family and representatives
- educators and examining bodies
- regulators, (e.g. Ofsted)
- suppliers and service providers – to enable them to provide the services we have contracted them for
- financial organisations, e.g. funders
- central and local government
- our auditors
- survey and research organisations
- health authorities
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- support staff from the Church our Centre partners with: to enable them to let you know about support services for you and your family.

2.7 Transferring data internationally

Where we transfer personal data outside the United Kingdom, we will do so in accordance with UK GDPR and the Data Protection Act 2018.

2.8 Your rights

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly

understand your rights and what they mean. If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding and using it, and how long we will keep it for
- explain where we got it from, if not from you or your parents
- tell you who it has been, or will be, shared with
- let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- give you a copy of the information.

You may also ask us to send your personal information to another organisation electronically (in certain circumstances).

If you would like to make a request, please contact our data protection officer.

2.9 Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

- say that you do not want it to be used if this would cause, or is causing, harm or distress
- stop it being used to send you marketing materials
- say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- have it corrected, deleted or destroyed if it is wrong (or restrict our use of it)
- claim compensation if the data protection rules are broken and this harms you in some way.

2.10 Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we have done something wrong. You can make a complaint, at any time, by contacting our data protection officer. You can also complain to the Information Commissioner's Office in one of the following ways:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113
- or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

2.11 Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Gill Viner

Data Protection Officer

Acorn Alternative Provision

11 Nab Wood Terrace

Bradford

3 Privacy notice for staff

Under UK GDPR and Data Protection Act 2018, individuals have a right to be informed about how Acorn Alternative Provision uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our Centre.

We, Acorn Alternative Provision, are the 'data controller' for the purposes of UK GDPR and Data Protection Act 2018.

Our data protection officer is Gill Viner (see 'Contact us' below).

3.1 The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- contact details
- date of birth, marital status and gender
- next of kin and emergency contact numbers
- salary, annual leave, pension and benefits information
- bank account details, payroll records, national Insurance number and tax status information
- recruitment information, including copies of right to work documentation, references and other information included in a CV, application form or cover letter, or as part of the application process
- qualifications and employment records, including work history, job titles, working hours and training records
- performance information
- outcomes of any disciplinary and / or grievance procedures
- absence data
- copy of driving licence and car insurance details
- photographs
- CCTV footage
- data about your use of the school's information and communications system.

We may also collect, store and use information about you that falls into 'special categories' of more sensitive personal data. This includes information about (where applicable):

- race, ethnicity, religious beliefs, sexual orientation and political opinions
- trade union membership
- health, including any medical conditions, and sickness records.

3.2 Why we collect and use this data

The purpose of processing this data is to facilitate your support to Acorn Alternative Provision, including to:

- keep you updated with our work
- provide you with any information or services you may have requested from Acorn AP
- contact you for fundraising and/or marketing purposes where you have given us permission to do so
- ensure our records are accurate regarding any communication we have had with you since you joined our database
- set up and manage any donations you may give during your time as an Acorn AP supporter.

3.3 Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- fulfil a contract we have entered into with you
- comply with a legal obligation
- carry out a task in the public interest.

Less commonly, we may also use personal information about you where:

- you have given us consent to use it in a certain way
- we need to protect your vital interests (or someone else's interests)
- we have legitimate interests in processing the data.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data

3.4 Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. Whenever we seek to collect information from you, we make it clear whether you must provide this information (and, if so, what the possible consequences are of non-compliance, or whether you have a choice).

3.5 How we store this data

We create and maintain an employment file for each worker we employ or otherwise engage, to work at our Centre. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment or work at the Centre.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Records Management Policy, which can be found on our website.

3.6 Data sharing

We do not share information about you with any third party without your consent (unless the law and our policies allow us to do so). Where it is legally required, or necessary (and it complies with UK GDPR and Data Protection Act 2018), we may share personal information about you with:

- our local authority: to meet our legal obligations to share certain information with it, such as safeguarding concerns
- the Department for Education
- your family or representatives
- educators and examining bodies
- regulators [e.g. Ofsted]
- suppliers and service providers: to enable them to provide the service we have contracted them for, such as payroll
- financial organisations, e.g. funders
- central and local government
- our auditors
- survey and research organisations
- trade unions and associations
- health authorities
- security organisations
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- professional bodies
- employment and recruitment agencies
- the Church our Centre partners with.

3.7 Transferring data internationally

Where we transfer personal data outside the United Kingdom, we will do so in accordance with UK GDPR and the Data Protection Act 2018.

3.8 Your rights

3.8.1 *How to access personal information we hold about you*

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. If you make a subject access request, and if we do hold information about you, we will:

- give you a description of it
- tell you why we are holding and processing it, and how long we will keep it for

- explain where we got it from, if not from you
- tell you who it has been, or will be, shared with
- let you know whether any automated decision-making is being applied to the data (and any consequences of this)
- give you a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

3.8.2 *Your other rights regarding your data*

Under UK GDPR and Data Protection Act 2018, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- object to the use of your personal data if it would cause, or is causing, damage or distress
- prevent your data being used to send direct marketing
- object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact our data protection officer.

3.9 **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection, or use of personal information, is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer. Alternatively, you can make a complaint to the Information Commissioner's Office:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113 or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

3.10 **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Gill Viner

Data Protection Officer

Acorn Alternative Provision

11 Nab Wood Terrace
Bradford
BD18 4HU.

4 Privacy notice for supporters

Under UK GDPR and Data Protection Act 2018, individuals have a right to be informed about how Acorn Alternative Provision uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about our supporters.

We, Acorn Alternative Provision, are the 'data controller' for the purposes of UK GDPR and Data Protection Act 2018.

Our data protection officer is Gill Viner (see 'Contact us' below).

4.1 The personal data we hold

We process data relating to our supporters. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- name and address
- contact information (email address, phone number)
- our contact history with you
- financial information (if you have given us a one-off donation or regular donations).

4.2 Why we collect and use this data

The purpose of processing this data is to facilitate your support to Acorn Alternative Provision, including to:

- keep you updated with our work
- provide you with any information or services you may have requested from Acorn AP
- contact you for fundraising and/or marketing purposes where you have given us permission to do so
- ensure our records are accurate regarding any communication we have had with you since you joined our database
- set up and manage any donations you may give during your time as an Acorn AP supporter.

4.3 Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- you have given us consent to use it in a certain way (e.g. to keep you informed of our work)
- comply with a legal obligation (e.g. tax and gift aid).

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

4.4 How we store this data

We store your data on our secure systems for as long as we reasonably need to for legal or business purposes, in accordance with our Records Management Policy, which can be found on our website. For example, if you give a donation to Acorn AP, we will keep records for 7 years to account for tax and accounting purposes.

Where we are not required to keep your data by law, you are able to request that your data is removed from our systems at any time and we are required to ensure that all data is then permanently removed from our systems.

4.5 Data sharing

We do not share or sell your information about you with any third party unless the law requires us to do so.

4.6 Your rights

You have the right to change, alter or delete the information that we store as follows:

- Right to be informed. We seek to be clear and specific when we collect information from supporters.
- Right to access. You are entitled to request a copy of any of your personal information that we have stored on our systems.
- Right to rectification. If any of your personal information that stored on our systems is incorrect, you have the right to have this updated.
- Right to be forgotten. If you request for all of your records to be deleted from our systems, we are lawfully required to carry out this request, other than if your data is required for lawful reasons (such as if you have given a donation which we have claimed Gift Aid on).

To exercise any of these rights, please contact our data protection officer.

4.7 Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection, or use of personal information, is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer. Alternatively, you can make a complaint to the Information Commissioner's Office:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113 or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

4.8 Website cookies

Like the majority of websites, Acorn AP's website uses cookies to provide the best user experience.

A cookie is a small piece of data that is stored on your computer's hard drive by your web browser. Cookies cannot look into your computer and obtain information about you or your family, or read any material stored on your hard drive. Using Cookies does not in any way compromise the security of your computer.

Acorn AP may use cookies to gather statistics about the number of people who visit the site and to help us develop the site content, layout and services. Acorn AP's website uses two types of cookies: Necessary and Analytics cookies.

Necessary cookies enable core functionality such as security, network management, and accessibility. You may disable these by changing your browser settings, but this may affect how the website functions.

Analytics cookies help us to improve your website experience by collecting and reporting information on how you use it. The cookies collect information in a way that does not directly identify anyone. By selecting 'accept all' you are allowing our website to use analytics software (Google Analytics, ClickDimensions, HotJar and Facebook Pixel) to collect data on how you interact with the website.

You can find out more information about cookies by visiting:
www.allaboutcookies.org.

4.9 Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Gill Viner
Data Protection Officer
Acorn Alternative Provision
11 Nab Wood Terrace
Bradford
BD18 4HU.