



## **PRIVACY NOTICE**

**Fresh Start in Education Limited**

Castle House | Castle Hill Avenue | Ground Floor | Folkestone | Kent | CT20 2TQ

**INVESTORS IN PEOPLE**  
We invest in people Gold

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**This Privacy Notice sets out how the Company uses and protects any information that you provide or which we gather or is submitted to us.**

## 1. INTRODUCTION

Fresh Start in Education Ltd is a specialist Interim Engagement and Education Service. We work with some of the most vulnerable children and young people and work to a high standard of Safeguarding and Data Protection.

The services of the Company are commissioned by Local Authority Departments, Schools and Colleges and occasionally parents/carers. All data processed by the Company is for the purpose of fulfilling our Contract with the body that commissions our services.

The Company's purpose is to engage with students and return them to formal or specialist education or, where appropriate, engage them in the workplace and secure long-term employment or apprenticeship.

The Data Protection Officer can be contacted by emailing [dataprotectionofficer@freshstartedu.co.uk](mailto:dataprotectionofficer@freshstartedu.co.uk) or by writing to: The Data Protection Officer, Fresh Start in Education Ltd, Castle House, Castle Hill Avenue, Folkestone, Kent CT20 2TQ.

## 2. DEFINITIONS USED IN THIS PRIVACY NOTICE

- Fresh Start in Education Ltd will be referred to as 'the Company' throughout the Privacy Notice
- The term 'staff' is used to cover all Company employees, contractors and workers
- The term 'Education Specialist' will be used to cover staff working with students in a provision and or staff accompanying students during a work placement
- The term 'Client' refers to any local authority, school, parent or body that commissions the services of the Company to work with a student or students
- An 'Identifiable Natural Person' is one who can be identified, directly or indirectly, in particular, by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person
- A 'Data Subject' is the identified or Identifiable Natural Person to which the data refers
- 'Data Controller' is a natural or legal person, Public Authority, Agency or other body which, alone or jointly with others, determines the purpose and means of the Processing of Personal Data
- A 'Data Processor' is a natural or legal person, Public Authority, Agency or other body which Processes Personal Data on behalf of a Data Controller
- 'Personal Data' is any information that relates to a living individual who can be identified from that information
- The term 'Information' refers to any fact or detail which is not 'Personal Data'
- The term 'Mobile Data' refers to data communicated wirelessly between a handheld and or a portable device(s)
- The 'Data Protection Officer' (DPO) may be contacted in writing at the Data Protection Officer, Fresh Start in Education Ltd, Castle House, Castle Hill Avenue, Folkestone, Kent. CT20 2TQ, or by email: [dataprotectionofficer@freshstartedu.co.uk](mailto:dataprotectionofficer@freshstartedu.co.uk)
- The terms 'processing', 'process' or 'processed' are used to cover any operation or set of operations performed on Personal Data or on sets of Personal Data, whether or not by automated means. Operations performed may include collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by

transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **3. WHY WE NEED TO COLLECT AND PROCESS PERSONAL INFORMATION**

Personal Data is processed as necessary by the Company's staff to ensure that the students placed with us get the maximum benefit from their time with us and are safeguarded effectively. We collect Personal Data that is submitted to us by the Client, including the details of the Client and their staff, and also during our Impact, Engagement and Education Plan (IEEP) meeting, to ensure that we have a full understanding of the student's needs and aspirations. We use this Personal Data to help us choose the most suitable Education Specialist and to design a bespoke Personal Learning Plan (PLP), to ensure that we give the student the best opportunities to achieve the goals set.

#### **3.1. Students and their Parents/Carers**

We keep Personal Data relating to the referral or placement of a student in order to:

- Perform the Contract that we have with the Client and in order to pursue the legitimate business interests of the Company
- Review and assess the effectiveness of the service
- Ensure that we can respond effectively to any questions about the behaviour or progress of students, and the effectiveness of staff or the Company's service
- Ensure that we can properly respond to any safeguarding or legal concerns or enquiries at any time.

Students and their parents/carers' Personal Data is never used for direct marketing purposes. Apart from day-to-day contact with students and their parents/carers during the course of a provision, the only other contact we may have will be to obtain feedback in connection with a provision.

#### **3.2. Clients**

Personal Data, that we hold on those who commission our services, is collected and held to ensure that we can fulfil any Contract, and for the legitimate business interests of the Company. Contact details may be used for direct marketing from time to time to keep Clients and potential Clients up to date with any changes to our services. Clients can choose to opt out from these communications if they wish.

#### **3.3. Applicants**

We keep Personal Data of people who apply to work for us, in order to process their application. Unsuccessful applicant's data is stored for no more than 24 months after they are informed of our decision regarding employment, unless it is necessary to keep Personal Data for Public Interest or legal reasons. After 24 months, Personal Data is deleted or anonymised, unless retained for reasons given.

#### **3.4. Staff**

Staff Personal Data is kept for up to 85 years.

### **4. THE INFORMATION WE MAY COLLECT, HOLD AND PROCESS ON A DATA SUBJECT**

The information that we may collect, hold and process on a Data Subject will depend entirely on their relationship with us. For example, most of the information we hold is about students. This covers education, engagement, behaviour, activities, special needs, abilities, and any other relevant information. Personal Data relating to parents/carers is generally limited to contact information and correspondence but may include additional Personal Data as required, to perform a Contract or fulfil

our legal obligations. We do not use the Personal Data of parents/carers or others involved with a student’s life or wellbeing, for marketing purposes.

The only information that we hold for marketing purposes relates to Clients, whose information we keep up to date with existing and new services that we offer, with the option to opt out. See **section 5** for information on how we use Personal Data.

The following 2 tables list the 5 main groups together with the Personal Data we collect, hold and process:

#### 4.1. PERSONAL DATA – Parents/Carers, Students and Clients

	<b>Category of Personal Data</b>	<b>Purpose of Processing</b>	<b>Legal Basis for Processing</b>
<b>Parents/Carers</b>	Names, telephone numbers, email addresses and email letter and telephone correspondence, audio recordings of telephone conversations, and any information provided by the Client.	<p>Fulfilment of the Contract with the Client.</p> <p>Safeguarding and Child Protection.</p> <p>Parents/Carers may be contacted from time to time to provide on the effectiveness of the Company’s service and as part of the Company’s continual improvement, and Quality Assurance.</p>	Legitimate Interest, Legal Obligation, Public Interest and Vital Interest.
<b>Students</b>	Names, addresses, date of birth, telephone numbers, email addresses, next of kin, emergency contact details, education history and plans, religion, disabilities, physical and mental health, medication, gender, sexual orientation, marital status, ethnicity, nationality, relatives' and or carers' contact details, social services contact details and role, Police and other official involvement, general educational and social history, court history and orders, financial information, social media history and interactions, audio recordings of telephone conversations.	<p>Future and current students: Fulfilment of our contract with the referring Client.</p> <p>Past students: Safeguarding and Child Protection, educational, behavioural and engagement history and attainment.</p> <p>Students may be contacted from time to time to provide feedback or to enter competitions to assess the effectiveness of the Company’s methods and as part of the Company’s continual improvement and Quality Assurance.</p>	Legitimate Interest, Legal Obligation, Public Interest, Vital Interest and Statistical Research and Processing.

<b>Clients</b>	Names, telephone number, email addresses, office address, job title, employer, email, letter and telephone correspondence, audio recordings of telephone conversations, contract(s), tenders, tender submissions, preferences and interests, general financial information relating to the Client body, payment terms and efficiency, usage of the Company's website.	Fulfilment of contract with the Client.  Safeguarding, Child Protection and Behaviour Management and Reporting.  Statistical Analysis and Review and Quality Assurance.	Legitimate Interest, Legal Obligation, Public Interest, Vital Interest and Research and Statistical Purposes.
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#### 4.2. PERSONAL DATA – Staff and Applicants

<b>Category of Personal Data (Staff and Applicants)</b>	<b>Purpose of Processing</b>	<b>Legal Basis for Processing</b>	<b>Recipients to whom disclosed</b>
Personal information and contact details including: name, address, date of birth, gender, marital status, ethnicity, nationality, telephone number, email address and next of kin, emergency contact details, job title, photo, signature, teacher number (where applicable), job title, photo, signature, primary and secondary languages, religion, sexual orientation, email, letter and telephone correspondence, audio recordings of telephone conversations.	To allow the organisation to maintain accurate records and contact details.  For HR and business administration purposes.  For defence against potential legal claims or safeguarding investigations.	Performance of a contract or to enter into a contract.  Legal obligation.  Legitimate Interests.	Clients, HR Consultants, Lawyers, and Government organisations as and when required, by law (LADO, Police, etc.,)
Recruitment records including: CVs, application forms, interview notes, test results, proof of right to work in UK (such as passports and visas), driving licence, evidence of skills and qualifications, references, car MOT, car insurance documents, prohibition of teachers checks, any other relevant checks and audio recordings of telephone conversations.	To assess an individual's suitability for work and to determine to whom to offer employment.  To comply with legislative and regulatory requirements.  For HR and business administration purposes.  For defence against potential legal claims or safeguarding investigations.	Performance of a contract or to enter into a contract.  Legal Obligation.  Legitimate Interests.	External organisations conducting reference and background checks, HR Consultants and Lawyers.

<p>Recruitment records containing special categories of Personal Data (including details of any disabilities disclosed and reasonable adjustments) and criminal records data (including results of criminal record checks).</p>	<p>To assess an individual's suitability for work and to determine to whom to offer employment.</p> <p>To comply with the requirement to make reasonable adjustments.</p> <p>For HR and business administration purposes.</p> <p>For defence against potential legal claims or safeguarding investigations.</p>	<p>Necessary to carry out obligations or exercise rights under employment law.</p> <p>Legitimate Interests.</p>	<p>External organisations conducting reference and background checks, HR Consultants and Lawyers.</p>
<p>Offer letters, contracts of employment, written statements of terms and related correspondence.</p>	<p>To maintain a record of staff's contractual and statutory rights.</p> <p>For HR and business administration purposes.</p> <p>For defence against potential legal claims.</p>	<p>Legal Obligation.</p> <p>Performance of a contract or to enter into a contract.</p> <p>Legitimate Interests.</p>	<p>HR Consultants and Lawyers.</p>
<p>Financial and tax information (including pay and benefit entitlements, bank details and national insurance numbers).</p>	<p>To pay employees and make appropriate tax payments For HR and business administration, and financial planning purposes. For defence against potential legal claims or safeguarding investigations.</p>	<p>Performance of a contract or to enter into a contract.</p> <p>Legal obligation.</p>	<p>Pension Provider HMRCE external benefits provider, HR Consultants and Lawyers.</p>
<p>Disciplinary and grievance records (including records of investigations, notes of disciplinary or grievance meetings and appeal hearings, correspondence with employees and written warnings).</p>	<p>To maintain a record of the operation of disciplinary and grievance procedures and their outcome.</p> <p>For HR and business administration purposes.</p> <p>For defence against potential legal claims or safeguarding investigations.</p>	<p>Legal Obligation.</p> <p>Legitimate Interests.</p>	<p>HR Consultants and Lawyers.</p>

<p>Absence and leave records containing special categories of Personal Data (including details of absence or leave taken, the reasons for absences, the type of leave, information about medical or health conditions, reasonable adjustments, records of absence management discussions, correspondence with employees and written warnings).</p>	<p>To maintain a record of the operation of absence procedures.</p> <p>To ensure that employees receive statutory and contractual sick pay or other pay entitlements (such as maternity or other family-related pay) and benefits.</p> <p>To meet health and safety obligations.</p> <p>To comply with the requirement to make reasonable adjustments.</p> <p>For HR and business administration purposes.</p> <p>For defence against potential legal claims or safeguarding investigations.</p>	<p>Performance of a contract or to enter into a Contract.</p> <p>Legal Obligation.</p> <p>Legitimate Interests Necessary to carry out obligations or exercise rights under employment law.</p>	<p>HR Consultants and Lawyers.</p>
<p>Performance records (including appraisal documents, performance reviews and ratings, targets and objectives, performance improvement plans, records of performance improvement meetings and related correspondence, and warnings, work with students, safeguarding issues and concerns).</p>	<p>To maintain a record of the operation of performance management systems and performance improvement processes</p> <p>For HR and business administration purposes</p> <p>For defence against potential legal claims or safeguarding investigations.</p>	<p>Legal obligation.</p> <p>Legitimate Interests.</p>	<p>HR Consultants and Lawyers.</p>

## 5. HOW WE USE YOUR PERSONAL DATA

### 5.1. Students

We use your Personal Data to:

- Contact you by email, phone or letter in connection with our work with you
- Arrange and conduct an assessment of your needs and aspirations
- Choose a suitable staff member to work with you
- Prepare a Personal Learning Plan and to review and update this during your time with us
- Report on your progress to the Client, including examples of work that you have done, behaviour, attendance and any other matters relating to your safety or education
- Liaise with your school, college or place of learning or employment
- Contact your parents/carers in an emergency, or for information and assistance in fulfilling our Contract with the Client
- Gain feedback on how you feel the service has worked or is working for you
- Compare the results of different groups of students with each other by age, location, ethnicity, and any other factor required by law or during any legitimate inspection of, or enquiry about, the service, by a Client



- Maintain a record of your time with us to respond to any legitimate enquiries
- Perform the requirements of our Contract with the Client
- Fulfil the legitimate interests of the business
- Comply with legal and regulatory requirements
- Statistical analysis, research, and the development of products and or service(s).

## **5.2. Parents and/Carers**

We use your Personal Data to contact you about the student, in order to fulfil our legal and regulatory obligations. This Personal Data will be used to:

- Contact you about the student by email, phone or letter
- Arrange meetings and maintain Safeguarding for the provision
- Collect feedback from you about the service
- Keep records of conversations and correspondence
- Perform the requirements of our Contract with the Client
- Fulfil the legitimate interests of the business
- Comply with legal and regulatory requirements
- Statistical analysis, research, and the development of products and or service(s).

## **5.3. Clients**

Information on those who commission our services or who may commission our services is used to:

- Contact you about a student by email, phone or letter
- Keep records of conversations and correspondence
- Perform the requirements of our Contract with you
- Fulfil the legitimate interests of the business
- Comply with legal and regulatory requirements
- Collect feedback from you about the service
- Statistical analysis, research, and the development of products and or service(s)
- Contact you about the service or potential use of the service and any changes.

## **6. HOW WE COLLECT YOUR PERSONAL DATA**

### **6.1. Students**

We collect your Personal Data, when a Client refers you to us. Once received, we will contact your parents/carers to meet with them, with you, and with any other person involved in your care, support and education his meeting is called an Impact, Engagement and Education Plan (IEEP) meeting. We use these meetings to gain relevant information about you, to enable us to develop an effective plan for you during your time with us. This information may be recorded on forms, notes made during meetings, telephone calls, documents provided by the Client, or other correspondence you or another party may have with us by any means.

### **6.2. Parents/Carers**

We are provided with your Personal Data by the Client and during our meetings with you or correspondence with you. This may be from face-to-face meetings, documents provided to us by the Client, telephone calls or corresponding with us by any means.

### **6.3. Clients**

Information is gathered from direct contact by you with us, by telephone, email or letter, a Referral Form, Reports or your corresponding with us, including any enquiry forms that you complete, marketing events you attend where we have a presence; for example, a trade show and or

conferences, mailing lists from third parties to which you have subscribed, our own research of information that is in the public domain or public sources, but in all cases only as permitted by applicable law. This also includes any information you provide through our Client Portal, which may include technical information such as IP Address, login information, user name, browser information including plug-ins, page interaction information, and usage methods, URL, dates and times of visits.

## **7. DISCLOSURE OF PERSONAL DATA**

### **7.1. Students**

We are appointed by a Client for our services to work with you to help you get back into school, college or into work. We will share information about your progress, to inform them about how you are doing. This information may include some or all of the following:

- Your attendance at sessions, including time keeping and any absences
- How you engage with us and how you get on with learning, together with examples of work that you do
- How you behave and your general attitude
- Any concerns we have about your safety
- Conversations that we have had with your parents/carers about you
- Information that we are legally required to give
- Any information necessary to fulfil the requirements of the Contract that we have with the Client.

### **7.2. Parents/Carers**

We will only disclose information about you to our staff and the commissioning body in connection with the engagement, education and safety of the student and others associated with them, and in order to perform the Contract, unless required otherwise by law.

### **7.3. Clients**

Information about Clients is shared with staff and member companies within the group only, unless otherwise instructed in order to perform a Contract, with prior agreement, or as required by law.

## **8. DATA RETENTION**

We may retain Personal Data about any Data Subject party to any Contract or referral for up to 85 years. However, information is only held for as long as necessary, as required by law, and for our lawful business processing. We regularly review our records to ensure that we only retain Personal Data for as long as necessary for the purposes set out in this Privacy Notice.

Where we no longer need Personal Data, we will dispose of it, or anonymise it, so that the Data Subject is no longer identifiable, or delete it in a secure manner, without further notice to you.

## **9. AUTOMATED DECISIONS**

We do not use Personal Data to make automated decisions.

## **10. MOBILE DATA**

The main use of Mobile Data is to fulfil the requirements of our Lone Working Policy, to ensure the safety of staff and students. This is done using a secure web browser on a mobile device and access to Personal Data is strictly limited to names and times of arrival and departure. For all uses of Mobile

Data, password protection and encryption are used to ensure data cannot be breached and that individuals cannot be identified.

### **11. MARKETING**

We do not use the Personal Data of any student, parent or carer for marketing purposes. Organisations that commission our services and those that could benefit from doing so may receive information on services, updates, information and news items from time to time, with the option to opt out from these, if preferred.

### **12. TRANSFER OF DATA OUTSIDE THE UK or the EUROPEAN ECONOMIC AREA**

No Personal Data is transferred outside the UK or the European Economic Area.

### **13. STORAGE AND SECURITY OF PERSONAL DATA**

The security and storage of your Personal Data is very important to us. The Personal Data we collect from you is stored on secure servers, protected through a combination of physical and electronic access controls, firewall technology and other security measures. In addition, when we create payment instructions and pass them to our banking partners, they will be encrypted using secure technology.

We have put measures in place to guard against unauthorised or unlawful processing and against accidental loss, destruction or damage.

If you contact us, we may ask some questions to establish your identity and will not disclose any personal information, under any circumstances, unless we are satisfied that you are who you claim to be.

Although we use market standard security software to protect Personal Data, we cannot guarantee the security of Personal Data transmitted by you or your agent to our websites, secure portals, applications or services - any transmission is at your own risk.

Once we have your Personal Data, we use strict procedures and security features to prevent unauthorised access. If you have a username and password to access certain areas of our websites, applications or services, please keep these confidential.

We do not have access to passwords. If you believe your account has been compromised, please contact the DPO immediately at [dataprotectionofficer@freshstartedu.co.uk](mailto:dataprotectionofficer@freshstartedu.co.uk).

In the event of any Data breach, the relevant parties will be contacted within the requirements of the law.

### **14. COOKIES**

Our website(s) may use Cookies to distinguish visitors from other users of the website and to help us to improve our website, applications and services.

For detailed information on our use of Cookies, please see our **Cookie Policy** on our website. We are committed to protecting your privacy and want to ensure that you understand how we collect, use, and disclose information. This Privacy Policy update specifically addresses our use of Google

Analytics Advertising Features and provides information on how you can opt-out of these features.

#### **14.1. Google Analytics Advertising Features:**

We have implemented certain Google Analytics Advertising Features on our website. These features allow us to better understand and optimize our website's performance and deliver more relevant content and advertisements to our visitors. The Google Analytics Advertising Features we have implemented include:

- Remarketing
- Google Display Network Impression Reporting
- Google Analytics Demographic and Interest Reporting
- Double Click Campaign Manager
- Double Click Bid Manager
- Google Display Network
- User-ID Tracking
- Google Signals.

#### **14.2. Use of Cookies and Identifiers:**

When you visit our website, we and our third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, as well as third-party cookies (such as Google advertising cookies) or other third-party identifiers, to collect and store certain information. These cookies and identifiers enable us to analyse website usage, customize content, and deliver targeted advertisements based on your interests.

#### **14.3. Opting Out of Google Analytics Advertising Features:**

You have the option to opt-out of the Google Analytics Advertising Features we use. There are multiple ways you can exercise your choice to opt-out:

- **Ads Settings:** You can adjust your Google Ads Settings to control the personalized ads you see across the web. Visit Ad Settings in your Google account to customize your ad preferences.
- **Ad Settings for Mobile Apps:** If you use our mobile app, you can modify your ad preferences by adjusting the settings within the app. Please refer to the app's settings or user guide for instructions on how to do so.

**Network Advertising Initiative (NAI) Consumer Opt-Out:** You may also opt-out of certain third-party cookies and interest-based advertising through the NAI's consumer opt-out platform. Visit the [NAI Consumer Opt Out](#) link for more information and to exercise your choice.

Please note that opting out of these features does not mean you will no longer see advertisements; instead, the ads you encounter may be less relevant to your interests.

### **15. YOUR INFORMATION AND RIGHTS**

You have the following rights:

- To be informed about how we obtain and use Personal Data
- To ask for a copy of the Personal Data that we hold about you, this is called a Subject Access Request.
- To have your information rectified
- To request us to restrict processing of your Personal Data

- To request to have your information erased (right to be forgotten)
- To object to the processing of your information; for example, for direct marketing purposes
- To have Personal Data you provided to us, returned to you or sent directly to another company, in a structured, commonly used and machine-readable format where technically feasible (Data Portability)
- Where the processing of your Personal Data is based on your consent, the right at any time to withdraw that consent
- To object to any decisions based on the automated processing of your Personal Data, including profiling
- To lodge a complaint with the Information Client's Office (ICO), the supervisory authority responsible for Data Protection matters.

If you withdraw your consent to the processing of your Personal Data, where the processing of your Personal Data was based on your consent, or you ask for your Personal Data to be erased, we may not be able to comply if you are linked with a student with whom we are working or have worked.

Should you want to exercise any of your rights, please contact the Data Protection Officer: [dataprotectionofficer@freshstartedu.co.uk](mailto:dataprotectionofficer@freshstartedu.co.uk)

All formal requests for access to, or changes to Personal Data, must be made in writing. We will need a recognised form of Proof of Identity before we can consider any request, in order to ensure that we are dealing with the Data Subject.

#### **16. ELECTRONIC MAIL CONTAINING PERSONAL DATA**

You may, from time to time, send Personal Data to us electronically. We are not responsible for the way in which you handle Personal Data. We recommend, where possible, that you communicate using either secure or encrypted email, registered post, or a secure portal or using encrypted files.

When we communicate personal information with you through electronic means, we will ensure that it is done securely using either encrypted files or secure messaging via our Online Portal.

To access our Online Portal, you are required to be a Registered Authorised User with a Username and Password.

#### **17. CHANGES TO OUR PRIVACY NOTICE**

We may change, modify or adjust this Privacy Notice from time to time; however, we will not reduce your rights under this Notice.

Our Privacy Notice will be kept up to date and can be found on our website: [www.freshstartineducation.co.uk](http://www.freshstartineducation.co.uk)

Copies are also available from us by post, please contact the DPO at the address in Point 18.

If you have any concerns about the way in which we collect or use your Personal Data, you may also contact the ICO directly at <https://ico.org.uk/concerns/>.

#### **18. CONTACT US**

We take your privacy and protection of your Personal Data very seriously. If you have any questions

or comments about the way we collect or use your Personal Data, please contact the DPO either in writing:

The Data Protection Officer  
Fresh Start in Education Ltd  
Castle House  
Castle Hill Avenue  
Folkestone  
Kent.  
CT20 2TQ

or by email: [dataprotectionofficer@freshstartedu.co.uk](mailto:dataprotectionofficer@freshstartedu.co.uk)

Our Data Protection Policy, of which this Privacy Notice forms part, is available upon request.

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Reviewed: September 2024  
Review Date: September 2025