Esteem Multi-Academy Trust (EMAT)

Privacy notice – Alternative Provision

Introduction

We share personal data with commissioned alternative provision providers where necessary to ensure pupils receive appropriate education, pastoral and safeguarding support. Personal and sensitive data will be shared with the external providers in order for the appropriate service to be delivered based on the individual's needs. The data may also be shared with other agencies, organisations or people as set out in the below privacy notice.

For the purpose of this privacy notice, Esteem Multi-Academy Trust (EMAT) and the academies within the Trust are the Data Controller for the personal data described in this notice.

Personal data we may share

Data already held within the academy system(s) will be shared with alternative provision providers on a case-by-case basis depending on the needs of the individual pupil, services to be delivered and support that is necessary.

Personal data that we may share about pupils and their families and carers includes, but is not restricted to:

- contact details, contact preferences, date of birth, identification documents
- results of internal assessments and externally set tests
- pupil and curricular records
- characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- exclusion and behaviour 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
- Where applicable, CCTV images captured in the academy.

Purpose of sharing the data

We may share the data with alternative provision providers in order to:

- support pupil learning
- monitor and report on pupil progress
- provide appropriate pastoral care
- protect pupil welfare
- manage safeguarding concerns
- develop strategies to improve pupil well-being and mental health
- encourage positive change and self-development
- comply with law regarding data sharing
- complete statistical returns to the Department for Education (DfE)

Legal basis for sharing this data

We only collect and use pupil's personal data when the law allows us to. Most commonly, we process it where the processing is necessary for us to:

- comply with Section 537A of the Education Act 1996 (school census)
- perform tasks subject to a legal obligation and/or in the public interest

Less commonly, we may process pupil's personal data is situations where:

- the individual has given clear consent for processing their personal data for a specific purpose
- to protect the individual's vital interests or the interests of someone else

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which enable us to lawfully process this data.

If consent has been sought and provided by an individual pupil, this can be withdrawn at any time. Please see our data protection policy for more information on how this can be done.

Collecting this information

While the majority of data we collect about pupils is mandatory, there is some data 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 not complying.

Data sharing

When commissioning alternative provision for individual people, it is necessary for us to share personal data with that provider. A data sharing agreement is in place, which also sets out times when that provider may need to share data with us, but also with other third parties and organisations who may include but who are not limited to:

- the local authority (LA)
- Department for Education (DfE)
- pupil's family and representatives
- internal management and governance bodies
- examination Boards
- Ofsted
- third party suppliers and service providers
- health authorities
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals, youth offending team
- professional bodies

Retention of Information

Personal data shared in connection with alternative provision will be retained in accordance with the Trust's Records Retention Schedule. At the end of the retention period, records will be securely destroyed or deleted.

Your data protection rights

For more information about how data is collected, stored, used, and protected, please see our data protection policy which can be found on our website: Esteem Multi-Academy Trust / GDPR

You will find details about your rights and how to access data we hold, and what to do if you are not satisfied or wish to complain.

If you think our collection or use of personal information is unfair, misleading or inappropriate or have any other concern about our data processing please raise this with us in the first instance by contacting the academies GDPR Lead.

EMAT's Data Protection Offer can be contacted:

J A Walker, Solicitor
PHP Law
The Brutus Centre
Station Road
Totnes
Devon
TQ9 5RW
E: info@phplaw.co.uk

You have the right to complain with the Information Commissioner's Office through the below channels.
Report a concern online: https://ico.org.uk/concerns/
Call: 0303 123 1113

Write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Review

Esteem Multi-Academy Trust will update this privacy notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Updated: November 2026