

PACE Education Pathways

Privacy Notice

Document control	Detail
Document title	Privacy Notice
Document type	Public-facing privacy notice
Version	3.0
Status	Approved for use
Document owner	Nathan Warr – Operations / Governance Lead
Approved by	Nathan Warr
Applies to	Pupils, parents/carers, staff, tutors, applicants, contractors, commissioners, suppliers, professional contacts and other individuals whose personal data PACE processes
Date approved	21/08/2026
Next review date	12 months from approval, or earlier where a review trigger applies
Review trigger	Earlier review if data-protection law or ICO guidance changes; PACE changes systems, processors, service delivery or information-sharing arrangements; a significant data breach or complaint occurs; or an audit identifies a control weakness.
Linked documents	Data Protection and UK GDPR Policy; Records Retention Schedule; Parent / Carer Consent and Information Sharing Form; Data Breach Log; Safeguarding and Child Protection Policy; Online Safety and Acceptable Use Policy; Single Central Record; Workforce Competency and Compliance Register.

Transparency note

This notice explains how PACE Education Pathways uses personal information. It should be read alongside the Data Protection and UK GDPR Policy. Safeguarding information may be shared without consent where this is lawful, necessary and proportionate to protect a child or another person from harm.

1. Who we are

PACE Education Pathways Ltd provides 1:1 alternative provision, tutoring, mentoring, reintegration and community-based education support. PACE will normally act as a data controller for its own business, workforce and service records. In some commissioned arrangements, responsibilities for personal data may be shared with or defined by a school, local authority or other commissioner.

PACE is registered with the Information Commissioner's Office (ICO). ICO registration number: ZC193549.

2. Information we collect

- Pupil information such as name, date of birth, school, year group, contact details, referral information and education history.

- Attendance, engagement, progress, learning, review and outcome records.
- SEND, disability, health, medical, wellbeing, behaviour, safeguarding and risk information where relevant to safe and appropriate provision.
- Parent/carers and emergency-contact details, consent information and communications.
- Information shared by schools, local authorities, health or safeguarding professionals and other agencies.
- Workforce and applicant information including identity, right-to-work, recruitment checks, DBS/suitability information, references, qualifications, training, supervision, payroll and emergency contacts.
- Commissioner, supplier and professional-contact information.
- Website, enquiry, email, online-session or platform information where provided or generated through PACE activity.

3. Why we use personal information

- Assess whether PACE can safely and appropriately accept and deliver provision.
- Plan and deliver education, tutoring, mentoring, reintegration and related support.
- Safeguard children, staff and others and manage risk.
- Record attendance, engagement, progress, incidents and outcomes.
- Communicate with pupils, parents/carers, schools, commissioners and professionals.
- Recruit, vet, manage, support and train staff, tutors and contractors.
- Meet legal, safeguarding, contractual, insurance, finance, audit and governance obligations.
- Investigate complaints, incidents, data breaches or professional-conduct concerns and improve services.

4. Lawful basis and special-category information

PACE will identify an appropriate lawful basis under UK GDPR for each type of processing. Depending on the circumstances, this may include contract, legal obligation, legitimate interests, public task where relevant to a commissioned arrangement, vital interests in an emergency, or consent where consent is genuinely appropriate.

Where PACE processes special-category information such as health, SEND or safeguarding information, an additional condition will be identified. This may include safeguarding, substantial public interest, employment obligations, health/social-care purposes or explicit consent where appropriate. Criminal-offence information, including DBS-related information, is handled only where there is a lawful basis and appropriate safeguards.

5. Who we share information with

- Schools, colleges, local authorities and other commissioners.
- Parents/carers and pupils where appropriate and lawful.
- Children's social care, safeguarding partners, LADO services, police, health or emergency services where necessary.
- Professional advisers, insurers, accountants, auditors and legal advisers.
- Approved IT, safeguarding, attendance, HR, finance and learning-platform providers acting under appropriate contractual and security arrangements.
- Regulators, courts or public authorities where disclosure is required or permitted by law.

PACE shares only information that is relevant and proportionate to the purpose. Safeguarding information may be shared without consent where there is another lawful basis and sharing is necessary to protect a child or another person.

6. How we keep information safe

- Access controls and role-based permissions.
- Secure cloud or electronic systems and password protection.
- Multi-factor authentication where available and appropriate.
- Secure handling of safeguarding, HR and recruitment records.
- Restricted sharing of sensitive information.
- Staff training and confidentiality requirements.
- Secure disposal and retention controls.
- Data-breach reporting and incident-response arrangements.

PACE expects staff to use approved systems and communication routes and to avoid storing identifiable pupil or safeguarding information on personal devices or unapproved accounts unless specifically authorised and protected.

7. How long we keep information

PACE keeps personal information only for as long as there is a lawful and operational reason to do so. Retention periods vary according to the type of record and may reflect safeguarding, education, employment, finance, insurance, contractual, commissioner and legal requirements.

Detailed retention periods are set out in the PACE Records Retention Schedule. Safeguarding and certain pupil records may need to be retained for substantially longer than routine administrative records.

8. Your rights

Depending on the circumstances and lawful basis, individuals may have rights to access personal information, request correction, request erasure, restrict processing, object to processing, request data portability and challenge certain automated decisions.

Not every right applies in every circumstance. PACE may need to withhold or redact information where safeguarding, legal duties, confidentiality, third-party rights or another lawful exemption applies. Requests should be directed to the Operations / Governance Lead.

9. Children and young people

PACE recognises that children require particular protection when their personal information is used. Information will be explained and handled in a way that is appropriate to the child's age, understanding and circumstances. Where a child is competent to exercise their own data-protection rights, PACE will consider those rights directly while also taking account of safeguarding responsibilities and parental responsibility where relevant.

10. Information obtained from other organisations

PACE may receive information from schools, local authorities, parents/carers, health services, safeguarding agencies, previous education providers and other professionals. This is used only where relevant to referral, safeguarding, risk assessment, education planning, service delivery, statutory duties or another lawful purpose.

11. Automated decision-making and artificial intelligence

PACE does not rely on solely automated decision-making to make significant safeguarding, suitability, education or employment decisions about individuals. Where artificial-intelligence tools are used to support administrative or planning activity, staff remain responsible for professional judgement and must not place identifiable or sensitive information into unapproved public AI services.

12. Data breaches

If personal information is lost, disclosed to the wrong person, accessed without authorisation or otherwise compromised, PACE will assess and contain the breach, record what happened and take corrective action. The ICO will be notified within the statutory timeframe where the breach meets the reporting threshold, and affected individuals will be informed where required.

13. Questions, concerns and complaints

Questions or requests about this notice or the way PACE handles personal information should be directed to the Operations / Governance Lead. PACE will seek to resolve concerns promptly and transparently.

Individuals also have the right to complain to the Information Commissioner's Office if they are dissatisfied with how their personal information has been handled.

14. Review

This Privacy Notice will be reviewed at least annually and sooner where PACE changes its information-processing activities, systems, service model or information-sharing arrangements, or where changes in law, ICO guidance, complaints, breaches or audits identify a need for revision.

Appendix A – Privacy information at a glance

Area	PACE position
Controller	PACE normally acts as controller for its own records; some commissioned arrangements may define shared or separate responsibilities.
ICO registration	ZC193549
Safeguarding sharing	Information may be shared without consent where lawful, necessary and proportionate to protect a child or another person.
Retention	Set by the PACE Records Retention Schedule and relevant legal, safeguarding, contractual and insurance requirements.
Rights requests	Directed to the Operations / Governance Lead and handled within statutory timescales.
Complaints	May be raised with PACE and, where appropriate, the Information Commissioner's Office.