

Privacy Notice

Pathway AcademyZone

Last updated: 5 October 2026

Who we are

Pathway AcademyZone is an alternative provision service run by Pathway First Ltd, part of the Pathway Group. Pathway First Ltd is the data controller for the personal information described in this notice. That means it decides how and why your information is used and is responsible for keeping it safe.

Pathway First Ltd is registered with the Information Commissioner's Office (ICO). Our registration number is Z8597622.

Our Data Protection Officer (DPO) oversees how we handle personal information. You can contact them at:

- Email: DPO@pathwaygroup.co.uk
- Post: Data Protection Officer, Pathway Group, Amington House, 95 Amington Road, Tyseley, Birmingham, B25 8EP

In this notice, “we”, “us” and “our” mean Pathway AcademyZone and Pathway First Ltd.

Who this notice is for

This notice explains how we use personal information about:

- learners who attend, or are referred to, Pathway AcademyZone
- parents, carers and others with parental responsibility
- staff at schools, local authorities and other organisations that refer learners or commission places
- people who visit our website or contact us
- people who apply to work or volunteer with us

We have written it in plain language so that learners can read it too. If anything is unclear, ask a member of staff or contact our DPO.

The information we collect

We only collect what we need to educate, support and safeguard our learners and to run our service.

Who	What we may collect
Learners	Name, date of birth, gender, address and contact details; unique pupil or learner number; referring school and local authority; attendance, behaviour, progress, assessment and qualification records; destinations after leaving us; photographs; CCTV images on our premises
Learners (special category information)	Special educational needs and disabilities, including Education, Health and Care Plans; health and medical information; safeguarding and welfare records; ethnicity and first language
Parents and carers	Name, relationship to the learner, address, phone and email; emergency contact details; our communications with you
Referrers and commissioners	Name, job title, organisation and work contact details; placement agreements and invoicing details
Website visitors and enquirers	Anything you enter in an enquiry or referral form; technical information such as IP address, browser type and pages visited
Job applicants and volunteers	Application details, employment history, qualifications and references; right to work and safer recruitment checks, including DBS checks

Special category information is more sensitive and the law gives it extra protection. We collect it only where we need it to meet a learner's needs or keep them safe.

How we collect information

Most of what we hold comes from the people and organisations who know the learner best.

- **From you.** When you complete a form, meet us, phone, email or use our website.
- **From the referring school or local authority.** Referral forms, prior attainment, attendance and behaviour records, Education, Health and Care Plans and safeguarding information.
- **From other professionals.** For example children's social care, health services, youth justice teams or the virtual school, where they are involved with a learner.
- **From our own records.** Registers, assessments, progress reviews and incident logs we create while a learner is with us.
- **Automatically.** Technical information from our website, and CCTV images at our sites.

Why we use it and our lawful basis

We must have a lawful basis under the UK GDPR for each use of personal information. The table shows the main ones.

What we use information for	Lawful basis
Admitting learners, planning and delivering their education, and recording attendance, behaviour and progress	Legitimate interests; public task where we act for a school or local authority carrying out its education duties
Reporting to the school or local authority that placed the learner, and to parents and carers	Legitimate interests; contract with the commissioner
Safeguarding learners and protecting their health, safety and welfare	Legal obligation; vital interests in an emergency
Entering learners for qualifications with awarding organisations	Legitimate interests
Responding to enquiries and referrals	Legitimate interests
Managing placements, invoicing and keeping financial records	Contract; legal obligation
Recruiting staff and volunteers safely	Steps before entering a contract; legal obligation
Running CCTV to keep our sites safe	Legitimate interests
Using learners' photographs or stories in publicity, and sending marketing	Consent

For special category information, we also rely on one of these conditions:

- substantial public interest, such as safeguarding children, supporting learners with a disability or medical condition, or monitoring equality of opportunity
- vital interests, where someone's life or health is at risk and they cannot give consent
- explicit consent, where we have asked for it

Where we rely on consent, you can withdraw it at any time by contacting us. This will not affect anything we did before you withdrew it.

We do not make decisions about learners using automated processing alone.

Who we share information with

We share information only when we need to and when the law allows it. We never sell personal information.

- **The referring school or local authority.** Attendance, progress, behaviour and safeguarding information about the learners they place with us.
- **Parents and carers.** Information about their child's education and wellbeing.
- **Safeguarding partners.** Children's social care, the police and health services, where we need to protect a child.
- **Awarding organisations.** To register learners for qualifications and issue certificates.
- **The Department for Education and the Learning Records Service.** Where a learner's programme requires it, for example to issue a Unique Learner Number.
- **Ofsted, auditors and other regulators.** When they inspect or review our provision.
- **A learner's next school, college or training provider.** To support a smooth move.
- **Other companies in the Pathway Group.** For shared services such as IT, finance and HR.
- **Our suppliers.** Companies that provide our IT systems and storage, under written contracts that require them to keep information secure and use it only on our instructions.

If we can no longer deliver a learner's programme, we will arrange for their records to be transferred securely to the organisation that takes over.

Children and young people

Most of our learners are under 18, so we take extra care with their information.

- Children have the same data protection rights as adults.
- A young person who understands their rights can use them personally. This is usually from around age 12, but it depends on the individual.
- For younger children, or where a young person cannot understand their rights, a parent or carer can act for them.
- We do not use learners' information for marketing, and we do not publish a learner's photograph, name or story without consent.
- Our website is aimed at parents, carers and professionals. We do not ask children to give us personal information through it.

Our website

You can browse our website without telling us who you are.

Enquiry and referral forms. We use what you send only to respond to you and, where relevant, to consider a referral. Please do not put detailed health or safeguarding information about a child in a general enquiry. We will arrange a secure way to share it.

Cookies. Our website uses cookies that are essential for it to work. We use non-essential cookies, such as analytics, only where you have provided your consent. You can manage your cookie preferences through the website's cookie settings. Further information about the

cookies we use and how you can manage your preferences is available in the Pathway Group Cookie Policy.

Links to other websites. Our site may link to other organisations' websites. They have their own privacy notices and we are not responsible for how they use your information.

Marketing

We send updates about our provision only to professionals and organisations who have asked for them or worked with us, and you can opt out at any time.

- To stop receiving marketing, email DPO@pathwaygroup.co.uk or use the unsubscribe link in any message.
- We will ask for your opt-in consent before sharing your details with any company outside the Pathway Group for marketing.
- Opting out of marketing does not affect messages we need to send about a learner's placement.

How long we keep information

We keep personal information only for as long as we need it for the purpose we collected it, or as long as the law requires.

- **Learner records.** Records relating to children and young adults are retained until the individual reaches the age of 21, in accordance with the Group's retention schedule. Where applicable, records relating to Department for Education (DfE) funded provision are retained for six years from the financial year-end following the last payment. Certain records, including safeguarding information, may need to be retained for longer where required by applicable legal, regulatory or safeguarding obligations. Once the relevant retention period has expired, personal information is securely disposed of.
- **Financial and contract records.** Six years after the end of the relationship, for tax and accounting purposes.
- **Everything else.** The periods set out in our Data Retention and Disposal Policy, which you can ask us for.

When we no longer need information, we delete or destroy it securely. We may keep anonymised information, which cannot identify anyone, for research and statistics.

Keeping information secure

We protect personal information with technical and organisational measures, and we review them regularly.

- Only staff who need information to do their job can access it.
- All staff are trained in handling personal information and in safeguarding.
- Our systems are regularly reviewed, assessed and tested.

- If a data breach is likely to put you at risk, we will report it to the ICO within 72 hours and tell you without delay.

If a supplier stores or processes information outside the UK, we make sure it has equivalent protection. We do this through UK adequacy regulations or approved contractual safeguards.

Your rights

You have rights over your personal information, and using them is free in almost all cases.

You can ask us to:

- tell you what information we hold about you and give you a copy
- correct information that is wrong or incomplete
- delete your information, in some circumstances
- restrict how we use your information, in some circumstances
- stop using your information, where we rely on legitimate interests or public task
- transfer information you gave us to another organisation, in some circumstances

You can also withdraw consent at any time where we rely on it.

How to make a request. Contact our DPO using the details at the top of this notice. You do not need to use a particular form or pay a fee.

What happens next. We may ask for proof of identity so that we do not give information to the wrong person. We will reply within one month. If a request is complex, we can take up to two more months and will tell you why.

We can refuse a request, or charge a reasonable fee, only if it is manifestly unfounded or excessive.

Questions and complaints

If you are unhappy with how we have used your personal information, you have the right to complain to us. Please tell us first so we can put it right.

Email DPO@pathwaygroup.co.uk or write to the Data Protection Officer at the address at the top of this notice. We will acknowledge your complaint within 30 days, investigate it, and tell you the outcome without undue delay.

If you are still not satisfied, you can complain to the Information Commissioner's Office:

- Website: ico.org.uk
- Helpline: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Changes to this notice

We review this notice regularly and show the date of the latest version at the top. If we make a significant change to how we use personal information, we will tell learners, families and commissioners directly.