Privacy Notice for Learners and Parents/Carers

Last Amended: October 2026

Next Review Due: October 2027

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Company number: 10813962

1. About This Notice

This notice explains how Nulogic Training Ltd (Nulogic) collects, uses, shares and protects personal information about the learners we work with and their parents/carers. It applies to learners in all our services, including School Inclusion Bases, off-site provision and Specialist Outreach.

“You” in this notice means the learner and their parents/carers. A short version for learners is at the end of this notice.

Nulogic is the ‘controller’ of the personal information we hold about you. This means we decide how it is used and we are responsible for looking after it.

Nulogic Training Ltd
23-25 Waterloo Place, Warwick Street, Leamington Spa, CV32 5LA. Company number 10813962. Registered with the Information Commissioner’s Office (ICO), registration number ZB883380.

Most learners remain on the roll of their school, and many are placed with us by a school or local authority (the commissioner). The commissioner is also a controller of the information it shares with us, and has its own privacy notice explaining how it uses your information.

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2. The Information We Hold

We may hold the following information about learners:

- name, date of birth, address, contact details and unique pupil number;
- details of the learner’s school, commissioner and placement, including their Individual Learning and Placement Plan (ILPP);
- the reason for the referral, including any exclusion history;
- whether the learner is looked after or has a social worker, and their contact details;
- attendance, behaviour and incident records;
- assessments, progress, qualifications and exam entries;
- information about special educational needs and disabilities (SEND), including Education, Health and Care Plans (EHCPs);
- health and medical information, including medication, allergies and dietary needs;

- safeguarding information, including concerns, referrals and information from other agencies;
- information about the learner's ethnicity, religion or first language, where it is shared with us by the commissioner or by you;
- photographs and videos, with consent where needed (see section 5);
- transport arrangements;
- CCTV images where CCTV is used at our provisions.

We may hold the following information about parents/carers:

- name, address and contact details;
- relationship to the learner and who has parental responsibility;
- records of our contact with you, including meetings and emails, and notes or transcripts of meetings.

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3. Where We Get Your Information

Most of the information we hold comes from:

- the learner's school or the local authority that commissions their place;
- parents/carers and the learner;
- other professionals working with the learner, such as social workers, health services and educational psychologists;
- exam boards and awarding organisations.

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4. Why We Use Your Information

We use your information to:

- plan and deliver the education and support each learner needs;
- keep learners safe, including meeting our safeguarding responsibilities;
- support learners' health, wellbeing and SEND needs;

- record attendance, behaviour and progress, and report to the learner's school, commissioner and parents/carers;
- enter learners for qualifications and exams;
- arrange transport and off-site activities;
- communicate with parents/carers;
- invoice commissioners and manage our contracts;
- meet our legal and contractual obligations, and deal with complaints and legal claims;
- check and improve the quality of our provision.

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5. Our Lawful Basis for Using Your Information

We only use personal information where the law allows us to. Our main lawful bases are:

- **Legitimate interests:** to deliver the education and support that schools and local authorities commission from us, where this does not override your rights;
- **Recognised legitimate interests:** to safeguard children and vulnerable people, and to respond to a major emergency;
- **Legal obligation:** where the law requires us to use or share information;
- **Vital interests:** to protect someone's life or health in an emergency;
- **Consent:** for some uses, such as photographs on our website or social media. You can withdraw consent at any time by contacting us.

Some information, such as SEND, health, ethnicity and religion, is 'special category' information, and safeguarding information may include information about offences. We only use this information where we also meet a condition in the UK GDPR and the Data Protection Act 2018, including:

- safeguarding children and individuals at risk;
- protecting someone's vital interests;
- equality of opportunity monitoring;
- establishing, exercising or defending legal claims; and

- your explicit consent, for example to give medication.

We use SEND and health information, such as EHCPs, medical needs and allergies, to keep learners safe and to meet their needs. Because this information is essential to protect each learner's wellbeing, we do not ask for consent to use it for these purposes.

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6. Who We Share Your Information With

We only share information when the law allows us to and when it is needed. We may share information with:

- the learner's school and the local authority that commissions their place;
- host schools, where a learner attends a School Inclusion Base;
- other local authorities, social care, health services and the police, including for safeguarding;
- exam boards and awarding organisations;
- the Department for Education, where the law requires it;
- transport providers arranged by us or the local authority;
- venues and activity providers for off site visits;
- Ofsted, when they inspect a school or local authority that places learners with us;
- our professional advisers, auditors and insurers.

We also use suppliers who process information on our behalf and under our instructions. These include our management information system (Arbor), our safeguarding records system (CPOMS), Microsoft 365, our accounting system (Xero), our online forms (JotForm), and the AI tools described in section 7. Our suppliers must keep your information secure and must not use it for their own purposes.

We never sell your information.

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7. Use of Artificial Intelligence

Some members of our Senior Leadership Team use AI tools to help with their work, such as drafting reports and letters and summarising meetings. These tools are Claude, provided by

Anthropic, and Granola, a meeting notes tool. This may include SEND, health and safeguarding information, under strict controls set out in our AI Policy and a data protection impact assessment. If Granola is used in a meeting with you, you will be told at the start and can ask for it not to be used.

In particular:

- AI is never used to make decisions about learners; people make every decision;
- everything an AI tool produces is checked by a member of staff before it is used;
- the companies that provide these tools may not use your information to train their AI;
- photographs or videos of learners are never put into AI tools.

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8. Transfers Outside the UK

Some of our suppliers, including Anthropic and Granola, store or process information in the United States. When information is transferred outside the UK, we make sure it is protected by safeguards approved under UK law, such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or the UK Extension to the EU US Data Privacy Framework.

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9. How Long We Keep Your Information

We keep information only for as long as we need it, in line with our records retention schedule. In general:

- learner records are kept until the learner's 25th birthday;
- SEND and EHCP records are kept until the learner's 31st birthday;
- safeguarding records, and accident and incident records, are kept until the learner's 25th birthday;
- qualification evidence is kept in line with the requirements of the awarding organisation;
- CCTV images are kept for no longer than 30 days, unless they are needed for an investigation, a safeguarding concern or a legal claim;

- photographs used with consent are removed when consent is withdrawn or no longer needed.

When a learner leaves, we securely pass safeguarding records and relevant SEND information to their school or new setting.

When we no longer need information, we delete or destroy it securely.

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10. Your Rights

You have the right to:

- ask for a copy of the information we hold about you (a 'subject access request');
- ask us to correct information that is wrong or incomplete;
- ask us to delete information, or limit how we use it, in some circumstances;
- object to us using your information in some circumstances;
- withdraw consent where we rely on it.

Learners who are old enough to understand their rights, usually from around 12 years old, can make these requests themselves. Parents/carers can usually make requests on behalf of younger learners.

To use any of these rights, contact us using the details in section 12. We will respond within one month of receiving your request. If your request is complex, we may extend this by up to two further months, and we will tell you if we need to.

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11. Complaints

If you are unhappy with how we have used your information, please tell us first using the details in section 12. We will acknowledge your complaint within 30 days and tell you what we are doing about it. We will keep you updated and tell you the outcome without undue delay.

If you are still unhappy, you can complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

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12. Contact Us

Our Data Protection Officer is the Head of Provision Operations.

Email: contact@nulogic.co.uk, marked for the attention of the Data Protection Officer

Phone: 0800 316 7330

Post: Data Protection Officer, Nulogic Training Ltd, 23-25 Waterloo Place, Warwick Street, Leamington Spa, CV32 5LA

We may update this notice from time to time. The latest version is available on our website.

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13. For Learners: The Short Version

What we know about you
Things like your name, your school, how you are getting on, your attendance, and any extra help you need with learning or health.

Why we have it
So we can teach you, support you and keep you safe.

Who we share it with
Your school, the council that arranged your place, and your parents or carers. If we are worried about your safety, we may share information with people whose job is to help keep you safe.

Computers and AI
Some of our leaders use AI tools to help write reports and notes. A person always checks the work and makes the decisions, not the computer. Photos of you never go into AI tools.

Your rights
You can ask to see what we know about you, and ask us to fix anything that is wrong. If you are worried about how we use your information, talk to any member of staff or your parent or carer.