Thallo
ALTERNATIVE PROVISION

Privacy Policy

Thallo Education Ltd.

VERSION: 1.0
DATE: 25th September 2026
AUTHOR: May MacKay-Morris

Organisation	Thallo Education Ltd.
Policy Lead	May MacKay-Morris Provision Lead / Director
Approved By	May MacKay-Morris - Director
Approval Date	25th September 2026
Review Date	September 2027 Or sooner, following relevant change.

1. Who we are

Thallo Education Ltd provides alternative education and early-intervention support for young people aged 10–16.

Thallo Education Ltd is the data controller for personal information processed in connection with its provision. This means we are responsible for deciding how and why personal information is used and for ensuring that it is handled appropriately.

Registered business address:
Black Pheasant Barn
Castlings Heath
Groton
Sudbury
Suffolk
CO10 5EU

Delivery setting: Little Cornard Village Hall, Suffolk.

Data Protection Lead: May MacKay-Morris
Email: may@thalloeducation.co.uk
Telephone: 07811 143355
Information Commissioner's Office registration number: 00015671299

2. Who this notice applies to

This notice explains how Thallo Education Ltd handles personal information relating to:

- Young people referred to or attending the provision.
- Parents, carers and people with parental responsibility.
- Professionals involved in referrals, education, safeguarding and support.
- Representatives of commissioning schools, local authorities and other relevant organisations.

Separate privacy information may be provided to employees, job applicants, volunteers and contractors.

3. Information we collect

We collect and use information necessary to assess referrals, deliver education and support, safeguard young people and fulfil our responsibilities.

Depending on individual circumstances, this may include:

- Names, dates of birth, addresses and contact details.
- Parent/carer information and emergency contacts.
- Current and previous educational settings, attendance and educational history.
- Unique pupil numbers and referral information.
- Special educational needs, disabilities and Education, Health and Care Plans.
- Relevant medical information, allergies, medication and health needs.
- Learning assessments, support plans, progress and achievements.
- Information about emotional wellbeing, communication, sensory needs and other barriers to education.

- Relevant safeguarding, child protection and social care information.
- Information relating to ethnicity, religion and other protected characteristics where necessary.
- Correspondence, meeting notes, incident reports and placement reviews.

We aim to collect only information that is relevant and necessary for the purpose concerned.

4. Where information comes from

We may receive information directly from young people and their parents or carers.

Information may also be provided by Suffolk County Council, commissioning schools, other education providers, health professionals, children's social care and other agencies involved in a young person's education, welfare or support.

We also create records during assessments, educational sessions, reviews and communications.

5. Why we use personal information

We use personal information to:

- Assess referrals and determine whether we can appropriately meet a young person's needs.
- Plan and deliver education, early intervention and individual support.
- Identify reasonable adjustments and appropriate safety arrangements.
- Monitor attendance, participation, learning, wellbeing and progress.
- Communicate with parents, carers, commissioners and relevant professionals.
- Safeguard young people and respond to welfare concerns.
- Maintain appropriate records of incidents, complaints and significant events.
- Support transitions, reintegration and progression.
- Meet applicable legal, regulatory and contractual obligations.
- Manage and improve the quality and safety of our provision.

6. Our legal basis for processing information

Thallo Education Ltd processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The lawful bases we expect to use for our principal activities are:

Activity	**Expected lawful basis**
Receiving and assessing referrals, planning placements and delivering educational support	Legitimate interests, Article 6(1)(f), where necessary to provide suitable education and support, maintain accurate records and coordinate with commissioners
Managing placements, attendance, progress, reviews and communications	Legitimate interests, Article 6(1)(f), where necessary for effective delivery, monitoring and administration
Meeting applicable statutory safeguarding, reporting and other legal duties	Legal obligation, Article 6(1)(c), where a specific legal duty applies

Activity	Expected lawful basis
Protecting children and other individuals from harm where no specific legal obligation governs the activity	Recognised legitimate interests, Article 6(1)(ea), where the statutory safeguarding conditions apply, or legitimate interests, Article 6(1)(f), as appropriate
Responding to emergencies involving a threat to life	Vital interests, Article 6(1)(d), where necessary
Managing financial records and statutory accounting obligations	Legal obligation, Article 6(1)(c), where applicable
Taking and using photographs or recordings for optional educational or promotional purposes	Consent, Article 6(1)(a), where consent is the appropriate lawful basis

Our legitimate interests include providing suitable educational support, protecting the welfare of young people, maintaining reliable placement records, coordinating with relevant professionals and operating the provision safely and effectively. We consider individuals' rights and freedoms, particularly those of children, before relying on legitimate interests.

Special category information

Some information, including health, disability-related information, ethnicity and religion, receives additional protection under data protection law.

Where necessary, we may process this information under an applicable Article 9 condition, including substantial public interest where the relevant safeguarding condition under the Data Protection Act 2018 is met.

We will only process special category information where a suitable legal condition applies and appropriate safeguards are in place. Information about criminal offences, where relevant, will be handled under the additional rules that apply to such information.

We do not rely on parental consent as the general legal basis for delivering education or fulfilling safeguarding responsibilities.

7. Sharing information

We share personal information only where necessary, proportionate and lawful.

Depending on the circumstances, information may be shared with:

- Suffolk County Council and other commissioning authorities.
- Commissioning schools and education settings.
- Parents and carers, where appropriate.
- Health professionals and relevant support services.
- Children's social care and safeguarding agencies.
- Emergency services and the police where necessary.
- Other education providers involved in a young person's transition.
- Awarding organisations where an agreed qualification or award is being pursued.
- Contracted technology providers acting on our behalf, subject to appropriate data-protection arrangements.

Information relating to safeguarding concerns may need to be shared without consent where necessary to protect a young person or another person.

We consider young people's rights, understanding and individual circumstances when responding to requests for information from parents or carers.

8. AQA Unit Award Scheme

Where a young person participates in an agreed AQA Unit Award Scheme opportunity, we may share the identifying information necessary for registration, assessment and certification with AQA.

This is expected to include the young person's name and date of birth, and may include additional details where required by the awarding organisation.

We will explain the relevant arrangements when an award opportunity is offered.

9. Photographs and recordings

We will seek appropriate prior consent from a parent, guardian or carer before taking or using identifiable photographs or video recordings of young people for planned educational or promotional purposes.

We will also consider the young person's own wishes and understanding.

Consent for optional photography or publicity may be withdrawn by contacting us. Withdrawal will not affect processing that was lawful before consent was withdrawn.

Where images or recordings are necessary for safeguarding or evidential purposes, different legal considerations may apply.

10. How information is stored and protected

We use managed electronic systems to store and manage information securely.

These include:

- **Google Workspace**, for organisational email, documents and associated services.
- **MosaicEd**, provided by Robarts Fox Ltd, for learner and provision management.

Security arrangements include role-appropriate access permissions, organisational accounts, multi-factor authentication, encrypted Thallo Education Ltd laptops and appropriate secure methods of transferring information.

Access to personal information is restricted to authorised individuals who need it for their responsibilities.

Paper records are minimised. Where necessary, they are stored securely and protected from unauthorised access.

We do not currently engage a separate contracted IT support provider. Any future external support arrangements involving access to personal information will be subject to appropriate contractual, confidentiality and data-protection safeguards.

11. Where information is held

MosaicEd uses UK-region hosting arrangements, according to the information supplied to us about the service.

Google Workspace operates through Google's international infrastructure. Information may therefore be processed or accessed outside the United Kingdom in connection with the services provided.

Where we make a restricted international transfer of personal information, it must be covered by an applicable UK adequacy arrangement, appropriate safeguards or a lawful exception. We will make information about applicable transfer safeguards available on request.

12. How long information is kept

We retain personal information for as long as necessary for the purposes for which it was collected, taking account of legal, safeguarding, educational, contractual and commissioner requirements.

Suffolk County Council records

Records relating to commissioned placements are retained in accordance with applicable Suffolk County Council requirements and the relevant contractual arrangements.

Under the CD1397 contract, relevant contract records are subject to a retention requirement of six years after the contract Expiry Date, unless a longer applicable retention requirement takes precedence.

Educational, safeguarding and health information

Pupil, safeguarding and health-related information may be subject to different retention requirements. These records are retained for the period appropriate to their nature, purpose and applicable legal or safeguarding obligations.

Financial and business records

Financial and business information is retained in accordance with applicable HMRC requirements and other statutory obligations.

Deletion and disposal

At the end of the applicable retention period, information is securely deleted or destroyed unless there is a lawful reason for continued retention.

We do not retain all categories of information indefinitely or apply one universal retention period to every record.

Individuals may request deletion of their personal information at any time. Each request will be considered under the applicable data protection rules, as explained below.

13. Your data protection rights

Individuals have rights relating to their personal information under UK data protection law.

Depending on the circumstances, these include the right to:

- Be informed about how personal information is used.
- Request access to personal information.
- Request correction of inaccurate information.
- Request erasure of information in certain circumstances.
- Request restriction of processing in certain circumstances.
- Object to certain processing activities.
- Request data portability where applicable.
- Receive relevant protections concerning certain automated decisions.

The right to erasure, sometimes called the right to be forgotten

Young people, parents, carers and other individuals may request the deletion of personal information held about them.

We will consider each request individually and will delete information where the right to erasure applies.

However, this right is not absolute. We may need to retain certain information where there is an applicable legal obligation, where it is necessary for the establishment, exercise or defence of legal claims, or where another lawful exception applies.

For example, information may need to be retained to meet applicable statutory record-keeping requirements or other legal obligations. A contractual retention requirement will be considered alongside the applicable legal basis and the individual's rights.

Where we cannot comply fully with an erasure request, we will explain the reason and inform the individual of their rights.

Requests for erasure and other information rights can be made verbally or in writing using the contact details in this notice. We will respond within the applicable statutory timescale, normally one month.

Young people have their own data protection rights. Where a parent or carer seeks to exercise a right on a young person's behalf, we will consider the young person's understanding, wishes and any relevant safeguarding considerations.

14. Complaints and concerns

If you have a question or concern about how we handle personal information, please contact:

May MacKay-Morris
Email: may@thalloeducation.co.uk
Telephone: 07811 143355

You also have the right to complain to the Information Commissioner's Office:

Website: https://ico.org.uk/
Telephone: 0303 123 1113

15. Reviewing this notice

This notice will be reviewed annually and sooner where there are material changes to our activities, systems, legal requirements or information-sharing arrangements.

We will make privacy information available to young people, families and other relevant individuals in an accessible format.