Privacy Notice

No Boundaries Alternative Provision Ltd (Company No. 17473576) | November 2026

1. Who we are

No Boundaries Alternative Provision Ltd is a data controller for the personal information we collect and use to assess referrals, arrange placements, deliver our provision, safeguard learners and manage our services.

We may receive personal information from referring schools, local authorities, parents, carers and other relevant professionals. We are responsible for ensuring that information is handled lawfully, securely and appropriately.

Where we share information with commissioning organisations, each organisation is responsible for meeting its own data protection obligations. Any arrangements involving processing personal information on another organisation's behalf will be documented separately.

Registered office:

Stokenchurch Community Centre, Bartholomew Tipping Way, Stokenchurch, HP14 3RX.

Data Protection Lead: Tabitha Rowley, Director.

Email: info@noboundariesap.co.uk.

2. Who this notice covers

This notice covers learners, parents and carers, people making enquiries or referrals, staff and applicants, visitors, commissioning organisations and people contacting us through our website. Separate employment or recruitment privacy information may be provided where appropriate.

3. Information we may collect

- Learner identity and contact details, emergency contacts, attendance, placement and referral information.
- Educational information, support plans, assessments, EHCP information and communication needs.
- Health, disability, SEND, allergies, medication and other information needed to support safety and participation.
- Safeguarding, welfare, behaviour and incident information, including information received from schools, families or relevant agencies.
- Parent/carer and professional contact details, correspondence, complaints and feedback.
- Staff and recruitment information, including identity, qualifications, references and safer recruitment checks.
- Website enquiries and limited technical information generated by the website or its service providers.

- Our website may use cookies and similar technologies to support its operation and security. Where non-essential cookies are used, we will provide information and obtain consent where required. Further details are available in our Cookie Policy.

4. Why we use personal information

- To assess referrals, arrange placements and provide appropriate education, sports and wellbeing support.
- To safeguard children, respond to concerns, manage incidents and communicate with relevant professionals.
- To make reasonable adjustments, manage health and safety risks and support individual needs.
- To record attendance, progress, communications, complaints and contractual activity.
- To recruit and manage staff, meet employment and financial obligations, and maintain secure systems.
- To respond to enquiries and operate our website.

We assess each referral individually using relevant information from schools, local authorities, parents/carers and professionals, together with discussions and, where appropriate, meeting the learner. We may consider necessary safeguarding information on a need-to-know basis to decide whether we can safely meet the learner's needs and what adjustments or support are required. Unsuccessful referral records are kept only for a justified period under our retention arrangements.

5. Lawful Bases for Processing Personal Information

No Boundaries Alternative Provision Ltd processes personal information only where there is an appropriate lawful basis under UK data protection legislation.

Depending on the purpose, we rely on the following lawful bases:

- **Contract (Article 6(1)(b)):** To manage parent/carer bookings, privately funded placements, payments and agreements with individuals.
- **Legitimate Interests (Article 6(1)(f)):** To assess referrals, plan and deliver appropriate educational support, monitor learner progress, maintain safe operations and communicate with families and commissioning organisations, where our interests are not overridden by individuals' rights and freedoms.
- **Legal Obligation (Article 6(1)(c)):** Where processing is necessary to meet a specific legal requirement, including applicable employment, financial or safeguarding requirements.
- **Vital Interests (Article 6(1)(d)):** Where processing is necessary to protect someone's life in an emergency.
- **Consent (Article 6(1)(a)):** For specific optional activities, such as using identifiable photographs for publicity, where valid consent has been obtained.

Some information, such as health and disability details, is special-category data. We process it only where an additional UK GDPR Article 9 condition applies. Relevant safeguarding and criminal-offence information is subject to further legal safeguards. We document the applicable conditions for our activities internally.

6. Where information comes from

We receive personal information directly from parents, carers and learners, and from referring schools, local authorities and other relevant professionals.

Referrals are received through an agreed secure method and reviewed by authorised staff. Please contact us before sending sensitive information so we can confirm the appropriate route.

When a placement is agreed, relevant information is recorded in our access-controlled learner and safeguarding records.

7. Who we share information with

We share information only when necessary, proportionate and lawful. Recipients may include commissioning schools and local authorities; parents or carers where appropriate; health, education and social care professionals; emergency services, police or safeguarding agencies; regulators and professional advisers; and service providers acting under appropriate contractual and security arrangements.

Safeguarding information may need to be shared without consent where necessary to protect a child or another person. We do not sell personal information.

8. Our systems and security

We use appropriate security measures to protect personal information, including access controls, confidentiality obligations and secure storage and sharing arrangements. We review the safeguards used by our service providers.

We assess international transfers, where relevant, and use an appropriate UK GDPR transfer mechanism if personal information is transferred outside the UK.

9. How long we keep information

We retain information only for as long as necessary, taking account of safeguarding, legal, contractual and insurance requirements. Different types of records have different retention periods, which are documented in our internal retention schedule. Safeguarding records may be retained for longer periods where required by safeguarding guidance and legal obligations. Records are securely disposed of when no longer needed.

10. Your data protection rights

Depending on the circumstances, individuals may have rights to access their personal information, request correction or erasure, restrict or object to processing, request portability, and withdraw consent where consent is the lawful basis. These rights are not absolute; safeguarding and other legal obligations may affect what can be provided or deleted. We explain privacy information in an age-appropriate way where possible and consider the child's views and understanding when handling information rights requests.

To make a request, contact info@noboundariesap.co.uk. We may need to verify identity before responding. We normally respond within one month, subject to permitted extensions.

11. Concerns and complaints

Please contact Tabitha Rowley at info@noboundariesap.co.uk if you have questions or concerns about how your information is used. You may also complain to the Information Commissioner's Office (ICO): https://ico.org.uk/ or telephone 0303 123 1113.

12. Changes to this notice

We review this notice when our activities or data practices change, and at least annually. The current version is available on our website. We will register with the Information Commissioner's Office (ICO) where required by law and will update this notice accordingly.

Approved by: Tabitha Rowley, Director

Date: November 2026

Next review: November 2027