



YOUNG PEOPLE & FAMILIES PRIVACY NOTICE

Alternative Provision, Outreach & Supported Accommodation

What this notice is for

This notice explains what personal information Wild Intervention Ltd collects about Young People and families, why we use it, where it comes from, who can access it, when we may share it, and the rights people have over their information.

1. Who we are

Wild Intervention Ltd provides Alternative Provision and Outreach services and Supported Accommodation. This notice applies to Young People and their families who receive, are referred to, or are being considered for these services. Some processing differs between services; those differences are explained below.

Organisation	Wild Intervention Ltd
Company number	12742718
Address	1-3 Wood Lane Mews, Beverley, HU17 8DA
Privacy contact	Data Protection Lead
Email	info@wild-intervention.co.uk
Telephone	01482 947876 – Outreach 01482 947771 – Supported Accommodation



2. Our services

Alternative Provision and Outreach supports Young People aged 8–16. Supported Accommodation supports Young People aged 16–18, including a Young Person who remains in situ after turning 18 where this forms part of an agreed transition or placement arrangement.

3. Where we get information from

Information may be provided directly by a Young Person or parent/carer, or received from organisations involved in referral, commissioning, placement or support. Alternative Provision referrals are commonly received through Local Authority portals or Wild Intervention referral forms. Supported Accommodation referrals are commonly received from Children's Social Services or a Local Authority.

We may also receive relevant information from schools, colleges, health professionals, Police, CAMHS, Youth Justice Services and other authorised professionals.

If a referral is not accepted

Referral information for a placement that is declined is deleted. Where a placement is accepted, relevant referral information is retained as part of the Young Person's service record. The original referral correspondence may also be retained within Wild Intervention's secure business email records in accordance with our retention arrangements.

4. Information we may hold

Depending on the service and the Young Person's needs, this can include:

- identity and contact information, including name, date of birth and relevant family/contact details;
- EHCPs, SEND information and educational information where applicable;
- health, medical and medication information;
- risk assessments, behaviour and incident information;
- family and social-care information;
- Police and Youth Justice information where relevant and lawful;
- safeguarding information and records;
- photographs or video where the appropriate permission or other lawful basis applies;
- for Supported Accommodation: placement and pathway plans, looked-after status, social-worker information, missing episodes, accommodation information, finances/benefits information and key-work records.



5. Why we use information

We use personal information to:

- assess whether we can safely and appropriately meet a Young Person's needs;
- plan, deliver and review Alternative Provision, Outreach or Supported Accommodation;
- manage safeguarding, welfare, health, medication, behaviour and risk;
- record attendance, engagement, progress, key work and service delivery as applicable;
- communicate and work with families, commissioners and other professionals;
- meet contractual, safeguarding, regulatory, legal, health and safety and quality-assurance obligations;
- respond to incidents, complaints, information-rights requests and regulatory enquiries.

Information needed to provide a safe service

Wild Intervention needs sufficient information to determine whether it can safely meet a Young Person's needs. If essential referral, safeguarding, health or risk information is not provided, Wild Intervention may be unable to accept or safely deliver the placement.

6. Our lawful bases

Wild Intervention identifies and records an appropriate lawful basis before processing personal information. Depending on the purpose and circumstances, this may include contract, legal obligation, legitimate interests, vital interests, public task where the legal requirements are genuinely met, or consent where consent is the appropriate basis.

Being commissioned by a Local Authority does not automatically mean that Wild Intervention is exercising a public task. Where public task is relied upon, Wild Intervention will identify the relevant function and basis in law.

Where we process special-category information, such as health, disability or other particularly sensitive information, or criminal-offence information, we also identify the additional condition required by data protection law.

Consent

Consent is not automatically the correct basis simply because information relates to a Young Person. Where Wild Intervention relies on consent, it must be freely given, specific, informed and capable of being withdrawn. Withdrawing consent does not make earlier lawful processing unlawful.



7. Young People's information

Young People's information requires particular protection. We aim to use only information that is relevant and necessary, keep it secure, and explain its use in a way the Young Person can understand. Where consent is relied upon, we will consider the Young Person's understanding and whether involvement of a person with parental responsibility is appropriate.

8. How information is recorded and accessed

Alternative Provision & Outreach

Following acceptance of a placement, relevant referral information is uploaded to the Young Person's Log My Care record and remains available as part of the provision record. Access to Log My Care is restricted to authorised staff allocated to that Young Person. Business Support accesses only the administrative information required for its functions, such as date of birth where required for invoicing. Senior management access is used only where required for legitimate management, safeguarding or operational oversight.

Wild Intervention also uses its own CPOMS system for safeguarding records and Microsoft SharePoint/OneDrive and secure business email for appropriate records and correspondence. Sapling is used primarily to provide relevant operational information to professionals. Parents/carers can view an individual Sapling log only where the guardian-sharing option has been enabled for that log. Occasional operational records may refer to a safeguarding matter while directing the reader to CPOMS for the substantive safeguarding record.

Supported Accommodation

Log My Care is the principal case-management system for Supported Accommodation. Authorised Supported Accommodation staff may access Supported Accommodation Young People's records where this is necessary for safe and consistent service delivery. This access does not provide access to Alternative Provision records unless the staff member is separately authorised for that service.

9. Safeguarding and information sharing

Data protection law does not prevent necessary and proportionate information sharing for safeguarding. Where there is an appropriate lawful basis, information may be shared without consent to protect a Young Person or another person from harm, meet a statutory duty, comply with a court order, or support the prevention or detection of crime.



Depending on the circumstances, Wild Intervention may share relevant information with Local Authorities, referring schools or colleges, Social Care, Police, CAMHS, Youth Justice Services, health professionals, regulators and other authorised professionals involved in the Young Person's care, education, accommodation, safeguarding or support. Only information that is necessary and relevant for the purpose should be shared.

10. Photographs, video, staff location and vehicle recording

Photography and video permissions for Young People are recorded through Wild Intervention's induction arrangements. Permission for one purpose does not automatically authorise another use.

Wild Intervention may use staff location information for operational and safety purposes. Although this tracks staff rather than Young People, in some circumstances a staff member's location could indirectly indicate the location of a Young Person they are supporting. Such information must therefore be handled securely and only for legitimate operational purposes.

Selected staff vehicles use dashcams. These record short rolling video segments and automatically overwrite older footage as device storage becomes full. Footage is used only where there is a legitimate safety, incident, safeguarding, insurance or evidential reason to access or retain it.

Supported Accommodation uses CCTV at access points for safety, safeguarding, crime prevention and protection of people and property. Access to footage is restricted and footage is disclosed only where lawful and necessary. Appropriate signage and privacy information are used.

11. Security and service providers

Wild Intervention uses technical and organisational measures including password protection, multi-factor authentication where available, secure cloud systems, role-based access, secure storage, staff training and controlled information sharing.

We use third-party technology and service providers to support delivery and administration. Where a supplier processes personal information on our behalf, Wild Intervention requires appropriate data-protection and confidentiality arrangements. Supplier and processing arrangements are subject to review.

Where personal information is transferred outside the UK, Wild Intervention will ensure that the transfer is lawful and that an appropriate UK data-transfer safeguard is in place where required.

12. How long we keep information

When Alternative Provision or Supported Accommodation ends, the Young Person's Log My Care profile is normally made inactive rather than immediately deleted. Other records may also need to be retained after the service ends for safeguarding, legal, contractual, regulatory or evidential reasons.



Wild Intervention keeps personal information only for as long as necessary and maintains, or will maintain, documented retention arrangements for the different categories of records it holds. Records are securely deleted or destroyed when there is no longer a lawful or operational reason to retain them.

Retention review

Wild Intervention is formalising its detailed Data Retention Schedule. Until a specific schedule period applies, records must not be kept indefinitely without review; retention decisions must take account of safeguarding, legal, contractual and regulatory requirements.

13. Your information rights

Depending on the circumstances, data protection law may give you rights to:

- be informed about how your information is used;
- access your personal information;
- ask for inaccurate information to be corrected;
- ask for information to be erased where the legal conditions are met;
- ask for processing to be restricted in certain circumstances;
- receive or transfer certain information where data portability applies;
- object to certain processing;
- withdraw consent where consent is the lawful basis;
- raise concerns about solely automated decision-making.

Wild Intervention does not currently make decisions producing legal or similarly significant effects solely through automated processing.

14. Requests from Young People and parents/carers

A Young Person may exercise their own information rights where they have sufficient understanding to do so. Requests to access personal information are handled as information-rights requests and coordinated through the Data Protection Lead.

A parent or carer does not automatically have an unrestricted right to all information held about a Young Person. Where a parent/carers requests records, Wild Intervention will consider the Young Person's rights, understanding, authority to act, safeguarding considerations, third-party information and the applicable data-protection rules before information is disclosed.



Subject Access Requests may be made verbally or in writing. We may need to verify identity or authority before releasing information. We will normally respond within one calendar month unless the law permits an extension.

15. Data breaches

Suspected personal data breaches are reported internally, investigated and recorded. Where required by law, Wild Intervention will notify the Information Commissioner's Office within the applicable statutory timescale and will notify affected individuals where a breach creates a high risk to their rights and freedoms.

16. Questions or complaints

If you have a question, want to exercise an information right, or are concerned about how Wild Intervention uses personal information, contact:

Contact	Data Protection Lead
Organisation	Wild Intervention Ltd
Email	info@wild-intervention.co.uk
Address	1-3 Wood Lane Mews, Beverley, HU17 8DA
Telephone	01482 947876

You also have the right to raise a concern with the Information Commissioner's Office (ICO), the UK's independent data-protection regulator.

17. Review and related documents

This notice is reviewed at least annually and when there are significant changes to legislation, systems, services or the way Wild Intervention processes personal information. It should be read alongside Wild Intervention's Data Protection and UK GDPR Policy and other relevant privacy information.

Document owner: Data Protection Lead | Related policy: WI-P-GDPR v3.0