NEO — Privacy Notice for Learners

14 Oct 2026, 9 min read

How we look after your information — for learners aged 13–18

Operating entity	Nudge Education Ltd (Company Number 10192753)
For	NEO learners aged 13–18
Status	Approved (v0.2, reviewed by Data Protection People Ltd); v0.3 amendments 30 Sep 2026
Version	0.3 — 30 September 2026
Owner	Data Protection Officer (Nudge Education Ltd), with the Director, NEO & Head of School
Where it goes	Before sign-up/sign-in; footer of NEO and Nudge websites

Your privacy at NEO

This guide explains what information NEO holds about you, why we have it, what we do with it, how we keep it safe, and the choices you have. If anything here is unclear, you can ask your Practitioner-Mentor or email us — our details are at the end.

The short version

- We will only use your information where it follows the law, and we will treat it fairly, and tell you how we use it.
- We will only use your information for the reasons we have told you we will use it for.
- We will only collect information from you that we actually need to help you learn and to keep you safe.

- We will keep your information secure, and make sure only the right people can see it.
- We will make sure the information we have on you is correct.
- We will delete your information when we no longer need it.
- We use AI carefully and with clear rules in place — AI does not make decisions about you, and a real person is always responsible for how we use your information.
- Your lessons may be transcribed (turned into text). We explain how below.
- You have the right to tell us what to do with your information in some cases, and you can ask us about it any time.

Who we are

We are Nudge Education Limited, and NEO (Nudge Education Online) is our online school. We are responsible for looking after your personal information — in data-protection language, we are the 'data controller'.

What information we collect

We only ask for what we need to support you well. This can include:

- Your name, date of birth, address, and email.
- Information from your parent or carer, like their name or phone number.
- Information about your learning, like when you joined us and how you're getting on.
- Information about your health or things you may need our help with to make your learning better.
- If we are ever worried that you, or someone else, might be in danger, then we may ask you for information about this.
- Sometimes information about any criminal records you may have, but only if we need it to keep someone safe.
- Information created as you learn online, like attendance, work you have done, messages in your Google Classroom, and lesson transcripts (see below).
- Anything you choose to tell us through the **Tell someone** page, and your daily **Cornerstones check-in** scores (see below).

Where we get it from

We will only get information about you from:

- You
- Your family
- The person that referred you, such as your school or local authority

Why we use your information

Our job is to help you with your learning and keep you safe. Under the law, we are allowed to use your information because:

- Teaching you is something we do to help the public.
- Sometimes the law tells us we have to
- In an emergency, we need to use it to help someone
- For some things, like taking your photograph, we will ask you if it's okay and you can say no or change your mind at any time.

If you are aged 13 or over, you can provide consent to your information being used.

How we use AI — and how we don't

NEO is built with a strict AI policy. Here is what that means for you:

- AI is not used to make decisions about you. Where AI is used at all, a qualified person checks the result and stays responsible for it.
- AI tools are not given your personal information unless we have done a formal data-protection check (a DPIA) and our Data Protection Officer has approved it. When AI helps staff plan lessons, it works from general material, not from information that identifies you.
- The AI assistant built into our staff Google tools (Gemini) is switched on only for teachers and senior staff, and is switched off for learners. The one place it handles your information is lesson transcription, explained below.
- We use AI mainly to help build and check the systems that keep you safe, not to interact with you directly.
- We will tell you and your family whenever AI is used in a way that genuinely affects you.

Lesson transcripts

- Live lessons are **not recorded**. Recording is switched off across NEO, and learners cannot record lessons either.
- Instead, some live lessons may be **transcribed** (turned into written text) by the note-taking tool built into our staff Google tools (Gemini). Only the teacher hosting the lesson can switch it on; it is never available to learners. When it is on, it turns what is said in the lesson — including what you say — into text.
- We use transcripts for safeguarding, quality and staff training — not for anything else, and never shared publicly.
- Transcripts help us understand how lessons are going. We are careful about what we read into them, and a person — not a machine — makes any judgement.
- We normally keep transcripts for one school term, unless we need to keep them longer for a safeguarding reason.

Tell someone, and your daily check-in

- **Tell someone** is a page in NEO where you can tell a member of staff if something is worrying you — about you or about someone else. You choose who to tell; our Designated Safeguarding Lead always sees it too, so that you get help. You can send it without your name. If you choose that, we do not store, email or log which account it came from.
- **Your daily check-in (the Cornerstones)** asks you to score how you're doing on six things — connection, movement, creativity, reflection, rest and nutrition — from 1 to 5. It is optional, you can see your own scores, and there are no streaks, reminders or nudges. Your Practitioner-Mentor and the Designated Safeguarding Lead can see your scores so they can support you; no computer makes decisions from them. We keep them only for as long as we need them to support you, and we will set out the exact period here once our data-protection advisers have confirmed it.

Keeping you safe online

To help keep you safe while you learn online, your NEO account (and any NEO-provided device) has safety filtering, provided by a tool called **Smoothwall** (made by a company called Qoria). It blocks harmful websites in any Chrome

browser you sign into with your NEO account. Smoothwall holds your name, your NEO email address and which group you are in (for example, learner or staff), plus a log of the sites the filter checks. Safety monitoring — which flags signs that someone might be at risk of harm, like searches or messages that suggest someone is being hurt or bullied — is not switched on yet; when it is, it will only run on NEO Chromebooks, a person will always review anything that is flagged, the tools don't act on their own, and anything serious goes to our Designated Safeguarding Lead. We will tell you before monitoring starts.

Who we share information with

We share only what's necessary, with:

- whoever referred you (your local authority or school), to report how you're getting on;
- NEO staff and any specialists involved in your support;
- authorities such as the local authority, police or NHS, if we must by law or to keep someone safe;
- trusted technology providers who help us run our secure systems (such as Google, and Smoothwall, our online-safety filtering and monitoring provider), who must keep your information safe and only do what we instruct.

How long we keep your information

- We usually keep your main learning and safeguarding records until your 25th birthday, because guidance for education and safeguarding asks us to.
- Lesson transcripts: about one school term (longer only if needed for safeguarding).
- If a referral doesn't go ahead, we delete the information within a short period.

When information reaches the end of that time, we delete or destroy it securely.

Your choices and rights

You (or your parent/carer) can:

- see the information we hold about you;
- ask us to correct anything that's wrong;
- ask us to delete information (we'll do this where the law allows);
- ask us to limit how we use it, or object to some uses;
- withdraw consent for things like publicity photos at any time.

We'll reply within one month. If your request is about safeguarding information, we handle it carefully with our Designated Safeguarding Lead so that no one is put at risk, under the **Child Protection and Safeguarding Policy**.

How we keep your information safe

We use strong security — including access controls so only the right people can see your information, encryption, staff training, and strict contracts with our suppliers. We keep extra protections around sensitive and safeguarding information.

Safeguarding comes first

If we believe a child or adult is at risk of serious harm, we will share information with the right people to protect them. We will tell you when we do this, unless telling you would increase the risk.

How to contact us about your information

- NEO (day-to-day): **neo@nudgeeducation.co.uk**
- Our Data Protection Officer: the function is held by the Director, NEO during our first period; we are also supported by our independent data-protection advisers, Data Protection People (0113 869 1290).
- If you're unhappy with how we've handled your information, you can contact the Information Commissioner's Office (ICO): ico.org.uk · 0303 123 1113.

Changes to this notice

If our services or the rules change, we'll update this notice and post the latest version on our website, and let you know where appropriate.