Edwin Privacy Notice

Updated June 2026

1. Who we are and what we do

Who we are

The Edwin Group ("Edwin", "the group", "us", "we", "our") is a limited company registered in England and Wales under registration number 12406031. Our registered office is at 5th Floor, Westfield House, 60 Charter Row, Sheffield, England, S1 3FZ. We are also registered with the UK supervisory authority, the Information Commissioner's Office ("ICO") in relation to our processing of personal data. Edwin is registered under registration reference ZB589488.

Edwin is made up of several companies; this privacy notice applies to the group's processing of personal data. When we refer to "Edwin", "the group", "us", "we", or "our", we mean the relevant company within the group that is responsible for determining how and why your personal data is used. Each Edwin company that is required to register with the ICO is registered separately under its own registration reference.

The specific Edwin company acting as the data controller will depend on your relationship with us. For example, the entity providing services to you, communicating with you, or entering into a contract with you. Edwin consists of the following companies:

- **Edwin** – parent company providing central support functions (such as IT, HR, compliance, safeguarding, data protection, marketing, finance & payroll) to the wider group.
- **Vision for Education & Axcis Education** – recruitment agencies with industry experience and expertise. Recruiting and supplying great teachers, support and leadership staff for temporary and permanent positions in schools, colleges and other alternative provisions across the UK.
- **Commando Joe's** – combining character education and high-quality enrichment to help young people develop the resilience, confidence and life skills they need to thrive. Classroom missions, active learning and enriching experiences help schools build environments where pupils feel capable, connected and ready to succeed.
- **Edwin People** – providing people-led, tech-enabled strategic leadership and specialist HR services for education.
- **Still Human (Part of Edwin People)** – delivering workshops and courses to staff in education on a range of health and wellbeing topics including stress management, rest, menopause and mindfulness.
- **Llama ID** – a safer recruitment platform providing an all-in-one solution to complete vetting checks and collect data to support the entire recruitment process.

Your personal data will be shared between the Edwin entities for internal administration service delivery, regulatory compliance or other legitimate business purposes. All intra-group transfers are governed by appropriate safeguards to ensure your personal data remains secure and is processed in line with UK data protection law.

What we do

Edwin is a collective of like-minded education professionals. We specialise in providing recruitment, retention, workload reduction solutions and curriculum enrichment for schools, trusts, and young people. We are committed to protecting your privacy and the security of any personal data we process about you.

We also provide a fully digital Disclosure and Barring Service (DBS) checking solution ("Edwin Verify") built exclusively for roles within the education sector. Edwin Verify may operate as a standalone service, or alongside the Llama ID journey. Personal data may be collected directly through Edwin Verify, or via Llama ID for the purpose of submitting DBS applications. This may

include applications for Vision for Education candidates, Axcis Education candidates and, where instructed, for external clients.

The purpose of this privacy notice is to explain what personal data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully.

If you have any questions, you can contact us using the information provided below under the 'How to contact us and our Data Protection Officer' section.

2. Who this privacy notice applies to

This privacy notice explains what personal data we collect about you, how it is used, and your rights under data protection law. This privacy notice applies to you if you:

1. Visit our websites
2. Receive services from us
3. Sign up to our recruitment services
4. Act as a referee on behalf of a work-seeker
5. Use the Llama ID platform
6. Have a DBS application submitted via Edwin Verify (including where we do this on behalf of an external client)
7. Sign up to receive newsletters and/or other promotional communications from us

If you are a parent or carer of a pupil receiving tuition with Vision for Education, please see the Tutoring Code of Conduct and Privacy Notice for Parents and Carers of Pupils.

3. What personal data is

'Personal data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special category personal data' is more sensitive personal data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

4. Personal data we collect

The type of personal data we collect about you will depend on several factors such as which of our group entities you engage with, and for what services/purposes.

Not all categories will apply to every individual or every Edwin group entity. The table below indicates which entity (or entities) are most likely to process each category, depending on the service you use.

Type of personal data	Most likely entity/entities
Basic contact details (e.g. name, email, phone number, address)	Edwin Vision for Education Axcis Education Commando Joe's Edwin People Still Human Llama ID
Marketing and preferences (e.g. newsletter sign-up, communication preferences)	Edwin Vision for Education Axcis Education Commando Joe's Edwin People Still Human Llama ID
Work-finding / recruitment information (e.g. CV, qualifications, employment history, suitability, references, training and CPD records)	Vision for Education Axcis Education Edwin People (executive recruitment)
Safer recruitment / onboarding checks (e.g. right to work, ID checks, DBS and safeguarding information)	Edwin Vision for Education Axcis Education Edwin People Llama ID
Special category data (e.g. health/disability and adjustments, absence information) and criminal offence data (e.g. DBS information) where relevant	Edwin Vision for Education Axcis Education Commando Joe's Edwin People (HR consultancy, where provided by clients) Llama ID
Pay and finance details (e.g. NI number, bank details, pay/tax information, payments)	Edwin Vision for Education Axcis Education Still Human Edwin People Commando Joe's Llama ID
Wellbeing service information (including any optional health information you choose to share)	Still Human
Online purchase information (e.g. bookings, portal access, online orders and payment status)	Edwin Commando Joe's Llama ID
Call recordings and related call information, such as audio recordings or transcriptions, call notes, call logs and related CRM records, where calls are recorded for training, monitoring, quality assurance, complaint handling or record-keeping purposes.	Vision for Education Axcis Education

Type of personal data	Most likely entity/entities
Images/audio/video (e.g. photographs or video used for marketing, case studies or testimonials where applicable).	Edwin Vision for Education Axcis Education Still Human Edwin People Commando Joe's
Platform account and usage information (e.g. user account details and platform activity logs)	Edwin Vision for Education Axcis Education Still Human Edwin People Commando Joe's Llama ID
Website and app usage information (e.g. IP address, cookies and analytics)	Any entity whose website, app or other online service you use
Device/technical information (e.g. device identifiers, browser type/version, log data)	Any entity whose website, app or other online service you use
Enquiries, complaints and claims (e.g. correspondence and dispute information)	Any relevant entity (depending on who you contact and the issue)

5. How we collect your personal data

We collect most of your personal data directly from you in person, by telephone, text or email and/or via our websites, apps or online portals, or when you respond to one of our surveys.

Where we act as part of a managed service provider (MSP) arrangement with other agencies, we will receive limited information about candidates, such as a name and confirmation that required compliance checks have been completed by the agency the candidate is registered with. We may receive further information where this is necessary for audit, assurance, query resolution or compliance purposes.

We may also collect your personal data from third parties such as:

- Jobs boards
- Referees
- DBS information and status information from the DBS Update Service and, where applicable, through Edwin Verify (including where data is submitted directly or via the Llama ID platform in connection with DBS application submission and administration)
- The Teaching Regulation Agency (TRA)
- Education Workforce Council (EWC)
- Society for Education and Training (SET)
- Home Office checking service
- Police (including carrying out overseas police checks)
- Local authorities
- Clients we are acting on behalf of (e.g. schools or trusts we provide our services to)
- Safeguarding, child protection or child support professionals and agencies

- Publicly available sources, such as social media platforms – we may also use reputable companies to carry out social media and adverse media searches for us.
- Reputable companies who provide lead generation contact lists
- Others to whom you have provided consent

6. Lawful basis and purpose for processing

Applicable data protection legislation requires us to identify an appropriate lawful basis for processing personal data. Depending on which Edwin entity you engage with, we may rely on different lawful bases for different activities. The tables below set out, for each entity, the main purposes for which we process personal data and the lawful bases we typically rely on (the precise lawful basis will depend on the circumstances and the relationship we have with you).

Edwin

Parent company providing central support functions (such as IT, HR, compliance, safeguarding, data protection, marketing, finance & payroll) to the wider group.

Lawful basis relied on	Purposes (examples)
Performance of Contract	Where Edwin contracts directly with you (or your organisation), to administer and perform that contract in connection with central group support functions (for example, managing service provision, including DBS application submission services via Edwin Verify, and related communications and record keeping).
Legitimate Interests	To provide central support functions to the wider Edwin group (such as IT, HR, compliance, safeguarding, data protection, marketing, finance and payroll) and to support internal group administration and service delivery.
Legal Obligation	To maintain records and comply with applicable legal and regulatory obligations (including tax, accounting and corporate compliance), to support safeguarding and other statutory reporting requirements where relevant, including carrying out and administering DBS and safer recruitment checks via Edwin Verify.
Consent	Where required, to send direct marketing communications or manage marketing preferences.

Vision for Education & Axcis Education

Education recruitment agencies with industry experience and expertise. Recruiting and supplying great teachers, support and leadership staff for temporary and permanent positions in schools, colleges and other alternative provisions across the UK.

Lawful basis relied on	Purposes (examples)
Performance of Contract	To provide work-finding services (registering candidates, assessing suitability, matching to roles, and managing assignments and related administration).

Lawful basis relied on	Purposes (examples)
Legal Obligation	To comply with legal obligations, including right to work checks, safer recruitment checks (e.g. DBS and related vetting where required), the Conduct Regulations, and relevant recruitment/employment, tax and record-keeping requirements.
Legitimate Interests	To operate and improve the quality of our services (including the recording and reviewing of calls for training, monitoring, quality assurance and record-keeping purposes), to contact you about suitable opportunities and service updates, manage client relationships, support fraud prevention and safeguarding, and carry out appropriate publicly available checks where relevant.
Consent	Where required, to send direct marketing and manage contact preferences, to carry out DBS update service status checks, and to obtain references or share information with third parties where consent is required (e.g. approaching referees).

Commando Joe's

Combining character education and high-quality enrichment to help young people develop the resilience, confidence and life skills they need to thrive. Classroom missions, active learning and enriching experiences help schools build environments where pupils feel capable, connected and ready to succeed.

Lawful basis relied on	Purposes (examples)
Performance of Contract	To deliver character and curriculum enrichment programmes (instructor-led and school-led), provide access to related apps, portals and programme materials, and administer delivery including bookings, communications, online orders and payments (typically via third-party payment providers).
Legitimate Interests	To manage client relationships, handle enquiries and requests, administer app / portal accounts and access, provide support, maintain service records, and monitor, quality assure and improve our programmes, apps and services.
Legal Obligation	To meet applicable legal obligations (including safeguarding and health and safety) and to maintain records required by law.
Consent	Where required, to send marketing communications and to use photographs/video, case studies and testimonials (e.g. on websites or marketing materials).

Edwin People

Providing people-led, tech-enabled strategic leadership and specialist HR services for education.

Edwin People's role (controller or processor) will depend on the service being provided, as set out below.

Lawful basis relied on	Purposes (examples)
Performance of Contract	To provide HR consultancy services to clients (e.g. MATs or schools) by processing personal data on the client's instructions (typically as a data processor), including producing advice/reports/outputs and returning them to the client, and to provide executive recruitment services (typically as a data controller), including understanding role requirements, sourcing candidates, assessing suitability, coordinating interviews and facilitating offers.
Legitimate Interests	To run and improve our services and operations (including record keeping, handling queries/complaints, and information security/fraud prevention), and to operate and improve the Edwin People website (including cookies and analytics). Business contact details for people we liaise with may be hosted in wider group databases and accessed by other Edwin group companies for internal administration, marketing and analytics.
Legal Obligation	To comply with legal obligations applicable to Edwin People (including accounting and tax and data protection compliance) and, where required, to support client compliance obligations.

Still Human (part of Edwin People)

Delivering workshops and courses to staff in education on a range of health and wellbeing topics including stress management, rest, menopause and mindfulness.

Still Human typically acts as a data controller for these wellbeing services.

Lawful basis relied on	Purposes (examples)
Performance of Contract	To deliver wellbeing training and support, administer bookings, provide access to wellbeing tools/apps, communicate with participants and client organisations, record attendance where relevant, and provide follow-up materials/support.
Legal Obligation	To run and improve our wellbeing services (including responding to enquiries/support), operate and improve the Still Human website, app and web-based services, maintain appropriate service records/quality assurance, and protect our business and clients.
Legitimate Interests	To comply with applicable legal obligations (including health and safety and accounting/tax record keeping) and data protection obligations applicable to Still Human (including maintaining required records/registrations).
Consent	Where required, to send marketing communications or email alerts and manage preferences (including unsubscribing), and to process optional information you choose to provide in connection with wellbeing support.

Llama ID

A safer recruitment platform providing an all-in-one solution to complete vetting checks and collect data to support the entire recruitment process.

Llama ID typically acts as a data processor on behalf of the client organisation it supports.

Lawful basis relied on	Purposes (examples)
Performance of Contract	To provide and administer the Llama ID platform to support safer recruitment and onboarding (including user accounts/access, customer support and platform security). Where applicable, this includes processing personal data submitted through the Llama ID journey to support the submission and administration of DBS applications via Edwin Verify, Edwin's eBulk DBS service, on behalf of and in accordance with the instructions of the relevant client.
Legal Obligation	Where applicable, to support compliance with safer recruitment and right to work requirements, and to maintain records required by law in relation to the platform.
Legitimate Interests	To operate, secure and improve the platform (including monitoring performance, preventing/detecting fraud or misuse, responding to enquiries/support requests, and analysing usage to improve user experience).
Consent	Where consent is required for a particular activity or check, it will typically be obtained and managed by the relevant controller (usually the client).

7. Sharing your personal data

Personal data may be hosted in centralised systems and accessed by relevant Edwin group companies where necessary for internal administration, service delivery, safeguarding, compliance, data protection, IT, finance, payroll or other legitimate business purposes.

In order to provide the services offered, we may also share your personal data with carefully selected third parties, including:

- Client organisations / educational establishments where we are providing them with our services or for the purpose of providing you with work-finding services
- Former employers whom we may seek references from
- Organisations seeking employment or financial references from us
- Trusted service providers to support the delivery of ID verification, right to work checks, background checking (including DBS applications), collection of references and related compliance services
- Trusted technology providers, including CRM, telephony, call recording and communications providers
- Government-approved Identity Document Validation Technology (IDVT) providers where used to complete digital right to work checks
- Training and CPD providers, including third-party platforms used to deliver, manage, record or evidence training and continuing professional development.
- Payroll service providers where they manage payroll on our behalf
- The police, local authorities, and any child protection professionals in the event of an investigation into your conduct
- Professional advisers, auditors and regulators where necessary for audit, assurance, legal, compliance or regulatory purposes

- Other companies, governing bodies or government agencies in order to carry out checks, for investigative purposes, or to provide services for the fulfilment of work-finding services being provided
- Payment service providers where an individual is required to make a payment via our websites/platforms
- Lead providers and/or other recruitment agencies involved in MSP arrangements, where this is necessary to support placement management, compliance confirmation, audits, assurance, query resolution or related administration.

Where DBS applications are submitted via Edwin Verify (either directly or through the Llama ID journey), personal data may also be processed as part of providing those services.

Where we share personal data with third-party service providers, we ensure that appropriate contractual safeguards are in place and that personal data is only processed for specified and lawful purposes in accordance with data protection legislation.

We do not sell personal data or share it with third parties for their own marketing purposes.

8. International transfers

Your personal data may be processed outside of the UK where organisations we use to provide our services to you are based outside the UK.

We take appropriate steps to ensure that any personal data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your personal data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or
- We enter into an International Data Transfer Agreement ("IDTA") with the receiving organisation and adopt supplementary measures, where necessary.

9. Your rights

You have certain rights in relation to the processing of your personal data, including:

Right to be informed
You have the right to know what personal data we collect about you, how we use it, the purpose of the processing and the lawful basis relied upon, who we share it with and how long we keep it for. We use this privacy notice to explain this.

Right of access (commonly known as a "Subject Access Request")
You have the right to request a copy of the personal data we hold about you.
Please note that where references are received on a confidential basis, we are unable to provide you with a copy as part of a Subject Access Request.

Right to rectification
You have the right to ask for any incomplete or inaccurate information we hold about you to be corrected.

Right to erasure (commonly known as the right to be forgotten)
You have the right to ask us to delete your personal data.
Please note that we may not always be able to delete all your personal data, where we are required to keep it for legal or regulatory reasons.

Right to object to processing
You have the right to object to us processing your personal data. If you object to us using your personal data for marketing purposes, we will stop sending you marketing material.

Right to restrict processing
You have the right to request that the use of your personal data is restricted.

Right to portability
You have the right to ask us to transfer your personal data to another party.

Automated decision-making
You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

Right to withdraw consent
If you have provided your consent for us to process your personal data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

How to exercise your rights

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

10. Complaints

You have the right to complain if you consider that we have not complied with the data protection law when handling your personal data. We will acknowledge receipt of your complaint within 30 days, investigate the matter without undue delay, and keep you informed of the progress and outcome. If you wish to complain please use the contact details given below under "How to contact us and our Data Protection Officer". We will do our best to resolve the matter to your satisfaction.

If you are not satisfied with the outcome of your complaint, you can complain to the relevant supervisory authority. **The supervisory authority in the UK is the Information Commissioner's Office (ICO). The ICO can be contacted online at:** https://ico.org.uk/global/contact-us/, or by telephone on 0303 123 1113.

For supervisory authorities in other countries within the EU see the link below:
https://edpb.europa.eu/about-edpb/about-edpb/members_en

11. Children's privacy

We do not generally offer our products and services directly to children. However, in some cases where we provide tuition or curriculum enrichment programmes, or where we are carrying out a safeguarding investigation, we may need to process limited personal data relating to children

where it is necessary to deliver the service and/or to meet safeguarding and related legal obligations.

Where relevant to a tuition booking, this may include more detailed information about a child, including special category personal data such as information about health, support needs or adjustments. In these situations, we only collect and use the minimum amount of information required, and we take appropriate measures to protect it.

If you learn that a child has provided us with their personal data without parental consent, you may contact us, as described below, and if appropriate, we will securely and permanently delete it, in accordance with applicable law.

12. Automated decision-making and profiling

Profiling is part of what we do, as it enables us to ensure you receive information that is most suited to you as an individual.

We don't use solely automated decision-making and profiling in a way that produces legal effects or significantly affects you. If you have any questions about this, you can contact us using the details in the 'Contact Us' section.

In some circumstances we may use third party AI screening tools as part of our recruitment processes. AI will never be used to make any recruitment decisions and output is always reviewed by a human.

13. Use of cookies and similar technologies

Our websites, survey service and apps utilise cookies and similar technologies. You can find out more by viewing our cookie notice.

14. Security and storage of information

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Access to your personal data is limited to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

If we become aware of any loss, misuse or alteration of personal data we will work closely with our IT team, DPO and other parties as necessary to investigate the incident at hand. We have put into place the relevant procedures and policies to investigate, mitigate and report (when needed to relevant parties) such instances.

15. Data retention

We will not keep personal data longer than is necessary for the purpose or purposes for which it was collected. Once personal data is no longer required, we will take all reasonable steps to

destroy or erase it from our systems unless we are obliged to retain it to comply with legal or regulatory obligations. This does not apply to anonymised data.

If you are engaging with us via one of our recruitment agencies (Vision for Education or Axcis Education):

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep candidate payroll records, holiday pay, sick pay and pensions records for as long as legally required by HMRC and associated national minimum wage, social security and tax legislation.

If you are placed into work or undertake a booking through us, we will usually keep your information for longer than if you only register with us. We will generally retain it for no longer than 7 years after your last day of work, or from the date you were last cleared to work, whichever is later. In some circumstances, we may need to retain your information for longer, including indefinitely where required by law (for example, under child protection legislation).

16. How to contact us and our Data Protection Officer

The Edwin Group operates a central Data Protection Team which is responsible for supporting data protection compliance across the group.

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

By email: dpo@edwin.group

By post: 5th Floor, Westfield House, 60 Charter Row, Sheffield S1 3FZ

We have also appointed a Data Protection Officer ("DPO"), our DPO is Evalian Ltd:

Evalian Limited
West Lodge
Leylands Business Park
Colden Common
Hampshire
SO21 1TH
United Kingdom

Website: www.evalian.co.uk

Please mark your communications FAO the Data Protection Officer.

17. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of any material changes where required by applicable law to do so. For previous versions, please contact us.

Last modified June 2026.