



# Privacy Notice

## Students and Applicants

Issue Date: October 2020

## **Privacy Notice – How we use your personal information**

The Lighthouse Learning Trust, which comprises both St Vincent College and Richard Taunton College, is committed to protecting your privacy. The Trust is the Data Controller of your personal data and complies with the General Data Protection Regulation (GDPR) and related UK data protection legislation.

This privacy notice explains how the Trust collects, uses, and processes the personal data of students at its colleges and/or those who are applying to become a student. This includes data that you provide and data that the Trust acquires by having you as an applicant/student.

In this document, the Lighthouse Learning Trust is referred to as 'We' or 'Ours'. Students and applicants are referred to as 'You' or 'Your'.

### **What information do we collect and use about you?**

We collect many different categories of information, which may include the following:

- Personal identifiers and contacts (such as name, any unique student number, contact details and residential addresses and email addresses including those of your parents/guardians)
- Characteristics (such as ethnicity, language etc.)
- Bursary and Free School Meals (income and income support, eligibility and use of both bursaries) and free school meals
- Safeguarding information (such as court orders and professional involvement)
- Special Educational Needs (such as learning difficulties and disabilities, support records, assessments, and exam access arrangements)
- Medical and Administration (such as medical conditions and details of medical care/advice given, doctors' information, child health, dental health, allergies, medication and dietary requirements)
- Financial (data needed to make/receive payments and record transactions)
- Security (CCTV footage and internet usage logs)
- Health & Safety (accident logs)
- Student Services (data for the administration of student services, including arrangements for trips and visits)
- Admissions (data that enables us to administer the student application process)
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools or educational institutions attended)
- Assessment and attainment information (your prior attainment at school or at another educational institution and data relating to your progress, exams and attainment at College)

- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Exams (data for the administration of exams)
- Study Programme (the course you are studying and your timetable)
- Feedback (survey responses from students)
- Consent (your consent preferences where applicable)
- Progression (your progression plans including Higher Education offers, careers advice and work experience. This includes confirmation of your progression activities within 12 months of leaving college)

### Special Category Data

Certain types of data are more sensitive and require more protection. These are:

- Personal data revealing racial or ethnic origin
- Personal data revealing political opinions
- Personal data revealing religious or philosophical beliefs
- Personal data revealing trade union membership
- Genetic data
- Biometric data
- Data concerning health
- Data concerning a person's sex life
- Data concerning a person's sexual orientation

Where we use special category personal data, we will only process this under the exemptions provided for by Article 9 of GDPR.

### **Why we collect and use this information**

We use your personal information to support your application and enrolment into college and, once you become a student, to support your learning. Beyond this, other reasons for using your data might include the following:

- To monitor and report on your attainment and progress
- To provide appropriate pastoral care and to safeguard students
- To keep you safe and safeguarded
- To ensure Health & Safety
- To enable the delivery and administration of student services
- To assess the quality of our services
- To meet the statutory duties placed upon us by the Department of Education and/or the Education & Skills Funding Agency and other public bodies
- To comply with our legal obligations to share information
- To make payments to you and/or your parents or guardians

## The legal basis for using your information

Depending on the purpose, our use of your information will be legal due to one of the following reasons:

- To meet the terms of a contract. [Article 6 (1) (b)]  
*For example: recording your personal and contact details*
- To meet a legal requirement [Article 6 (1) (c)]  
*For example: providing information to the Department for Education*
- To protect the vital interests of you or someone else [Article 6 (1) (d)]  
*For example: giving your contact details to emergency services*
- Delivering a public task [Article 6 (1) (e)]  
*For example: keeping records of your meetings*
- Legitimate interests [Article 6 (1) (f)]  
*For example: processing personal data to prevent fraud*

In most cases, the legal basis for our collection and use of your data will contractual Specific consent will however be sought from students for the following purposes:

### Photography and Filming Consent

The Trust will seek written consent from students before publishing their images (for any purpose) as captured in photographs, video recordings, or in any other format.

### Use of Biometric Recognition Systems

Where the Trust uses a student's biometric data as part of an automated biometric recognition system it will comply with the requirements of the Protection of Freedoms Act 2012. The Trust will seek written consent before any biometric data is collected or processed. A student has the right not to participate in the processing of biometric data, and may withdraw their consent at any time if it has been previously given.

## How We Safeguard Your Personal Data

We care about protecting your data. As such, we have in place a range of appropriate technical and organisational measures that are designed to prevent unauthorised access to, and misuse of, your personal data. These include measures to deal with any suspected data breach.

## How Long We Keep Your Personal Data

We will keep your data for as long as you are a student with us. After you stop being a student, we will not keep your data for any longer than necessary. Reasons for the retention of your data might include:

- To meet legislative requirements
- To provide academic references
- To provide previous students with information (for example, confirmation of grades)
- To allow data analysis and for statistical purposes
- To respond to any enquiries or complaints received from former students
- To ensure safeguarding

The Trust's data retention policy will be applied in all cases.

## Sharing Your Personal Data

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so, or when you have given your consent. We may disclose your personal data to a variety of recipients, including:

- Our employees
- Agents, contractors, suppliers, and service providers
- Those with a legitimate interest in tracking student progress and attendance
- Awarding bodies
- Government departments and funding bodies where we have statutory obligations to disclose data
- Crime prevention or detection agencies including the police and government agencies
- The Courts
- Parents, guardians and next of kin

Where we share your personal data with someone who is a supplier or service provider, we will take steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

## International Data Transfers

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). In these circumstances your data will only be transferred where such a transfer is subject to appropriate safeguards.

## **Your rights to your personal data**

You have rights relating to the personal data that we collect and use. Your rights are different depending on the legal basis of the information we are using. If we are using your personal data based on your consent, you can withdraw that consent and we will stop using that personal data. Withdrawing your consent will need to be recorded in writing: please contact the Trust's Data Protection Officer whose details can be found at the end of this Privacy Notice.

### **The right to be informed**

If you ask us, we must tell you if we are collecting or using your personal data.

### **The right of access to your personal data**

You have the right to access the personal data that we hold about you, and to receive a copy of that data. This is known as a Subject Access Request. You have a right to access this data so long as you are aged 12 years or over.

Parents/guardians may exercise these rights on behalf of a child if the child authorises them to do so, when the child does not have sufficient understanding to exercise the rights him or herself, or when it is evident that this is in the best interests of the child.

You will also need to supply us with standard information to verify your identity when making a subject access request.

### **Correction and Erasure**

You also have the right to:

- Require us to correct the personal data we hold about you if it is incorrect
- Require us, in certain circumstances, to erase your personal data (e.g. where our use of your personal data is based upon your consent).

## **Who To Contact**

Please contact the Principal or other members of the senior leadership team at your college if you wish to make a Subject Access Request or if you have other questions about your data, You may also contact the Trust's Data Protection Officer for further advice or if you have questions about this privacy notice. Our Data Protection Officer is:

Andrew McVittie

**[andrew.mcvittie@lighthouselearningtrust.ac.uk](mailto:andrew.mcvittie@lighthouselearningtrust.ac.uk)**

If you have a concern or complaint about the way that we are collecting or using your personal data, please raise this with us in the first instance so that any mistakes can be corrected on your behalf. If we are unable to resolve matters for you, then you can contact the Information Commissioner's Office via the ICO website:

**[www.ico.org.uk](http://www.ico.org.uk)**