Lighthouse Learning Trust

TURNING OPPORTUNITY INTO SUCCESS.

Students and Applicants Privacy Notice

Publication Date	Oct 2025
Version Number	1.2
Policy Owner	Data Protection Lead
Approval Level (committee)	PPD & Compliance Committee
Applies To (job roles relevant to)	All Staff
Next Review Due	Oct 2026

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 UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

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 hold some personal information about you to make sure we can help you learn and look after you at college.

For the same reasons, we get information about you from some other places too – like schools, the local council and the government.

This information includes:

- 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

Under the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, the lawful bases we rely on for processing student information are:

- 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

Collecting Student Information

We obtain student information via enrolment and application forms at the start of each academic year. Student data is essential for the colleges operational use. Whilst most of the student information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with GDPR we will inform you at the point of collection, whether you are required to provide certain student information to us or if you have a choice in this.

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.

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. We hold student data securely for the set amount of time shown in our data retention schedule. For more information regarding our data retention schedule and how we keep your data safe, please see our Trust Data retention policy.

Parental, Emergency and Next of Kin Details

As part of your application, we require you to provide contact details for parents, emergency contacts and/or next of kin. We request and store this information based on legitimate interest for:

- Emergency
- Safeguarding
- Health and Safety
- Disciplinary
- Academic progress and attendance

Students on reaching the age of 18 may withdraw permission for communication to their Parent/Next of Kin through an application via the Welfare team.

Sharing Your Personal Data

We do not share personal information about you with anyone outside the College without permission from you unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another legitimate interest under data protection law, we may share personal information about you with:

- Local education authorities – to meet our legal duties to share certain information with them, such as students leaving college during the academic year
- The Department for Education
- The Education and Skills Funding Agency
- Educators and examining bodies
- Ofsted
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations

- Central and local government, including where appropriate, the Falkland Islands government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

Wellbeing and Counselling Services

Lighthouse Learning Trust is committed to supporting the wellbeing of all students across its colleges. To provide additional emotional and mental health support, the Trust offers access to a confidential wellbeing and counselling service through an external provider, Health Assured.

When you contact or use the Health Assured support line, you are engaging directly with an independent service provider. All information you share with Health Assured remains confidential and is not routinely shared with the Trust or its colleges.

In exceptional circumstances, where your health, wellbeing, or welfare (or that of another person) is considered to be at imminent or serious risk, Health Assured may disclose relevant information to the Trust or to appropriate external agencies. This will only occur where necessary to protect your or another person's vital interests, in accordance with Article 6(1)(d) and Article 9(2)(c) of the UK GDPR.

The Trust does not receive any detailed counselling records or notes from Health Assured. The Trust may, however, receive anonymised statistical reports to help monitor service usage and effectiveness. These reports do not contain information that could identify any individual.

For further details on how Health Assured processes personal data, please refer to their privacy policy available on their website.

Websites, Cookies and Tracking

The Trust and its Colleges use cookies in accordance with the Trust's overarching Cookie Policy, which applies across all Trust-operated websites. For full details, please refer to the Cookie and Privacy notices on the Websites

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 Lead 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.

Requests for access to personal data will be fulfilled in a manner that is reasonable and proportionate, in line with current legislation. If your request is unclear, we may ask for clarification, and the time limit for responding will be paused until we receive your response. In certain cases, where a request is complex or involves multiple records, we may extend the response period by up to two additional months. If an extension is required, we will notify you within one month of receiving your request and explain the reasons for the delay.

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

Should you wish to make a Subject Access Request or if you have other questions about your data or this privacy notice, please contact the Trust's Data Protection Lead using the subject line **GDPR** via:

Dataprotection@lighthouselearningtrust.ac.uk

Our Data Protection Lead is:Tanya Gover

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. You may also submit a complaint via (Complaints, Concerns and Compliments Form) to our Data Protection Lead. We will aim to respond to all complaints within 15 working days.

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