

This privacy notice will be subject to regular review and will be updated to reflect changes in the collection or use of personal information.

### **How we use your personal information**

Your information will be held by The Sixth Form College Farnborough as part of The Prospect Trust. This privacy notice explains how we collect, use and process your personal data. This includes data you provide and data we acquire by having you as an applicant/student.

Your privacy is important to us and we are committed to protecting and safeguarding your data privacy rights.

You may wish to show this privacy notice to a parent/guardian to help you understand it fully.

### **Why we collect personal data**

We use your personal information to support your application and enrolment into the College and, once you become a student, to support your learning. Beyond this, other reasons include:

- to keep students and parents/guardians informed;
- to safeguard students' welfare and provide appropriate pastoral and medical care;
- to provide education services (including SEN), careers services and extracurricular activities;
- to administer the bursary and free school meal provision;
- to administer trips and activities;
- to meet our legal and statutory duties and responsibilities;
- to demonstrate student eligibility for and obtain government funding;
- to monitor and report on student progress;
- to carry out planning and forecasting, research, and statistical analysis;
- to assess the quality of our services;
- to enable students to take part in national or other assessments;
- to support students through the higher education application process;
- to create and/or maintain students' personal learning records;
- to provide access to student services such as online payments, parking and catering;
- to facilitate consultation evening booking and management;
- for referencing purposes;
- to enable local authorities and schools to carry out their obligations regarding student tracking and reporting;
- for College advertising and promotional purposes; and
- for the administration of enquiries and complaints.

## Legal basis for processing

Data protection law allows us to collect and process personal data if we have a lawful basis to do so. We consider the processing of your personal data to be either:

- necessary for the performance of tasks we carry out in the public interest e.g. education;
- necessary for the performance of our contractual obligations with you e.g. in order to have you as an applicant/student;
- necessary for compliance with a legal obligation; or
- necessary for the pursuit of the legitimate interests of the College.

If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw this consent at any time through CristalWeb or by contacting the Registry.

## Categories of personal data

The categories of data that we collect and process are listed below. Please note the data we collect and process may change based on College requirements during any given academic year.

Category of Data	Description
Personal and Characteristics	Data to identify you and document your characteristics.
Contact	Where you live and how to contact you and your parents/guardians.
Admissions	Data to enable us to administer the application process.
Study Programme	The courses you are studying and your timetable.
Attainment	Your prior attainment at school and data relating to your academic progress, exams and attainment at College.
Exams	Data for the administration of exams.
Attendance	Your attendance in lessons, and absences.
Behaviour	Behavioural data including exclusions and interventions.
Progression	Your progression plans including HE offers, careers advice and work experience. This includes confirmation of your progression activities within 12 months of leaving.
Special Educational Needs	Learning difficulties and disabilities, support records, assessments and exam access arrangements.
Medical	Medical conditions and details of medical care/advice given.
Safeguarding	Child protection, welfare and safeguarding.
Bursary and Free School Meals	Income and income support, eligibility and use of both the bursary and free school meals.

Financial	Data needed to make/receive payments and record transactions.
Security	CCTV footage and internet usage logs.
Health and Safety	Accident records.
Trips and Activities	Data for the administration of trips and activities such as Duke of Edinburgh expeditions.
Student Administration	Data for the administration of student services e.g. online payments, catering and parking. Correspondence and any other information you provide.
Feedback	Survey responses of students.
Consent	Your consent preferences where applicable.

### Special Category Data

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

- genetics (sex);
- ethnicity; and
- health (medical, special educational needs and welfare).

We process this data because there is substantial public interest for us to do so.

As an official public authority we are permitted to ask you about unspent relevant criminal convictions in order to meet our safeguarding obligations.

### Where we collect personal data from

We collect data from:

- your application to the College;
- your pre-enrolment, enrolment and induction process;
- your interactions with the College through our systems, in person or through letters, emails, forms, surveys or phone calls;
- financial transactions with the College; and
- third party service providers and government agencies (data processors and controllers listed in “who we share your information with”). You will be issued with separate privacy notices from these third parties where appropriate.

### Who we share your personal data with

We may share your personal data within the Prospect Trust and with the following:

- parents and guardians;
- companies you ask us to share your data with e.g. for academic references or work experience placements; and
- local and national press (with consent).

Data Processors: companies that process personal data on behalf of the College.

- Data analysis providers.
- Auditors and legal/professional advisors.
- Uniware (cashless catering).
- School Cloud Systems (consultation evening booking).
- Google.
- Confidential waste disposal companies.

Data Controllers: companies that determine the purposes for which, and the manner in which, any personal data is processed.

- Government agencies including Education and Skills Funding Agency, Department for Education, The Data Service, Learning Records Service and Ofsted.
- Joint Council for Qualifications.
- Awarding bodies and Duke of Edinburgh.
- UCAS.
- Financial service providers.
- Online resource providers.
- Local authorities.
- Educational establishments including your previous school and universities you apply to.
- Police, courts and security organisations.
- Health and Social welfare organisations including Children Services, Child and Adolescent Mental Health Services (CAMHS) and Multi-agency safeguarding hub.
- Public transport providers.
- Travel Agents.
- Disclosure and Barring Service.
- Health and Safety Executive.

### **Education and Skills Funding Agency**

Personal information is collected by the ESFA in accordance with the terms and conditions of funding imposed on providers of learning e.g. the College. Your personal information is processed by the DfE, and by those third party organisations when they process your information on behalf of the DfE, to enable the DfE to carry out its functions. The ESFA Privacy Notice can be found here: <https://www.gov.uk/government/publications/esfa-privacy-notice>.

### **Learning Records Service**

The information you supply is used by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE), to issue you with a Unique Learner Number (ULN) and to create your Personal Learning Record, as part of the functions of the DfE. For more information about how your information is processed, and to access your Personal Learning Record, please refer to: <https://www.gov.uk/government/publications/lrs-privacy-notice>.

### **How we use your data to make automated decisions**

We sometimes use systems to make automated decisions based on personal data we have or are allowed to collect from others. This ensures our decisions are quick, fair, efficient and correct, based on what we know. You have a right to object to automated decision making.

Here are the types of automated decision we make:

**Applicant selection:** if we receive too many applications by the published application deadline we will use an automated process to select applicants for interview as per the criteria in the admissions policy published on our website.

**Attendance emails:** we will send an automated email to your parent/guardian to highlight our concerns when we detect problem attendance.

### **How we use your data for profiling**

Profiling is the automated processing of personal data to evaluate certain things about an individual. We will use profiling to identify vulnerable and potentially disadvantaged students (economically or sociologically) in order to effectively safeguard and support them.

This profiling is a result of data provided by you or received from the government. This is necessary in order for us to enrol you as a student and to demonstrate performance to Ofsted.

### **Sending data outside of the EEA**

Google is an international organisation and in order to provide you with access to Google services your data may end up being transferred to a data center outside of the EEA. Google's privacy policy can be found here: <https://privacy.google.com/intl/en-GB/index.html>

Other service providers used by the College may also transfer or store data outside of the EEA. In such cases, it will only be where the destination country has been declared by the European Commission as having adequate levels of protection or where adequate and appropriate safeguards are in place.

### **If you choose not to give personal data**

In most cases you will be required to provide the personal data requested, however, there will be some occasions when it is optional.

If you choose not to give us necessary personal data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to provide you with a government funded education. It could mean that we are unable to offer you a place to study here or to continue to provide you with an education.

### **How we safeguard your personal data**

We care about protecting your data. That's why 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.

If you suspect any misuse of, loss of, or unauthorised access to your personal data please let us know immediately.

### **How long we keep your personal data**

We will keep your data for as long as you are a student of The Prospect Trust.

After you stop being a student, we may keep your data for one of these reasons:

- to meet legislative requirements;
- to provide academic references;
- to provide previous students with information, for example the confirmation of grades;
- to allow data analysis and for statistical purposes; or
- to respond to any enquiries or complaints.

Applicant/student records will be destroyed once the retention period has expired. The retention schedule is published as part of our Data Protection Policy. Paper records will be securely destroyed onsite or via a confidential waste disposal company.

### **What rights you have over your personal data**

The law gives you a number of rights in relation to your personal data including:

- the right to access the personal information we have about you;
- the right to get us to correct personal data that is wrong or incomplete;
- in certain circumstances, the right to ask us to stop using or to delete your personal data; and
- the right to receive your personal data in an easily re-usable format when it's processed on certain grounds, such as consent or for contractual reasons. You can also ask us to pass this information on to another organisation.

You can object to us keeping or using your personal data. This is known as the 'right to object'.

You can also ask us to delete, remove or stop using your personal data if there is no need for us to keep it. This is known as the 'right to erasure' or the 'right to be forgotten'. In some situations we may be able to restrict the use of your data.

There may be legal or other official reasons why we need to keep or use your data but please tell us if you think that we should not be using it.

Further information about your rights can be found on the ICO website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>.

### **Letting us know if your personal data is incorrect**

You will need to tell us if your information changes, for example your legal name or contact details. Most of your information will be visible through CristalWeb. Some of it can be amended through CristalWeb, otherwise changes must be reported to Registry.

### **How to get a copy of your personal data**

You have the right to ask us to confirm what data we hold about you at any time: this is known as a subject access request. If we provide you with access to the data we hold about you, we will not charge you for this unless your request is considered manifestly unfounded or excessive. Where we are legally permitted to do so, we may refuse your request, but we will tell you the reasons for doing so.

You can make a subject access request by contacting the Data Protection Officer:

[dpo@farnborough.ac.uk](mailto:dpo@farnborough.ac.uk).

## **How to complain**

Please let us know if you are unhappy with how we have used your personal data. Complaints should be made to the Data Protection Officer: [dpo@farnborough.ac.uk](mailto:dpo@farnborough.ac.uk).

You have the right to lodge a complaint with the Information Commissioner's Office.