Privacy Notice – Parents and Carers

(This includes Student Applicants, current students and Alumni).

Franklin College Trust is committed to protecting and respecting the privacy of your personal data as a parent/guardian*, whilst your child is a student applicant, a student at the Trust and once they have left the Trust. This Privacy Notice explains how we collect, use, store, and share your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant data protection laws. Please read this notice carefully to understand how we manage your data.

Note that parent could be next of kin, primary contact or guardian

Franklin College Trust is a provider, who is responsible for the collection and processing of your personal data, as defined by data protection laws. The Trust is the data controller and/or processor for personal data relating to you.

What Personal Data We Collect

We collect and process the following categories of personal data. The points below are only examples and not an exhaustive list, and may include other data where appropriate– if you have any questions, please contact the Data Protection Officer:

1. **Personal Information**: Name, address, date of birth, gender, contact details (including email and phone number).
2. **Characteristics**: Such as ethnicity, language, nationality, country of birth.
3. **Financial Information**: Household income, that will allow the Trust to ascertain whether your child is eligible to receive for example, financial support, if applicable, including Free school meal eligibility.
4. **Photographs and Video**: Photographs, videos or testimonials for example, during Trust activities or Trust related events for marketing or educational purposes. These may all be used for promotional purposes and such as but not limited to, Trust printed publications, on the Trust website and on social media or any other suitable forum the Trust deems acceptable. Additionally, this information may be shared with schools, employers and any other appropriate third parties. These may also be used once your child has left the Trust.
5. **Any other relevant data that the Trust deems appropriate**.

How We Use Your Personal Data

We use your personal data for the following purposes. The points below are only examples and not an exhaustive list, and may include other usages of your data where appropriate – if you have any questions, please contact the Data Protection Officer:

- To Comply with Legal Obligations: To meet legal and statutory requirements and comply with the law regarding data sharing.
- Contact parents in an emergency
- Provide parents with information to help students in their studies with us
- Provide parents with information about student applications
- **Consent**: In some cases, we may ask for your consent
- **Legitimate Interests**: We may process your data for legitimate interests, such as improving services and communications

Lawful Basis for Processing Your Personal Data

Generally, the information that we collect is part of our public interest task of providing education to our students. This allows us to collect the information we need on behalf of the government to draw down funding on each student's behalf.

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We collect and use student information under Article 6 (1) of the General Data Protection Regulation 2018 (GDPR) where:

- processing is necessary for compliance with a legal obligation to which the controller is subject.
- processing is necessary for us to protect the vital interests of your young person.
- processing is necessary for the performance of a task carried out in the public interest.

We do not undertake any automated decision making.

The Trust is committed to being transparent about how it collects, uses, stores and deletes data and to meeting its data protection obligations.

The Trust will use the information provided in a manner that conforms with the Data Protection Act 2018 (DPA 2018), the UK GDPR and the Human Rights Act 1998.

Your Rights

Under data protection law, you have the following rights regarding your personal data:

1. **Access**: You have the right to request access to the personal data we hold about you in certain circumstances.
2. **Rectification**: You have the right to request that we correct any inaccurate or incomplete data in certain circumstances.
3. **Erasure**: You have the right to request the deletion of your personal data in certain circumstances.
4. **Restriction**: You have the right to request that we restrict the processing of your personal data in certain circumstances.
5. **Data Portability**: You have the right to request that we transfer your personal data to another organisation.
6. **Objection**: You have the right to object to certain types of processing of your data in certain circumstances for example if it is likely to cause, or is causing, damage or distress.
7. **Withdrawal of Consent**: If we process your data based on your consent, you have the right to withdraw that consent at any time in certain circumstances.

To exercise any of these rights, please contact the Trust's Data Protection Officer (DPO).

Right to request access to your information

Under data protection legislation you have the right to request access to your information that the Trust holds. To make a request for this, please email information.governance@franklin.ac.uk who will process the request in partnership with Franklin College Trust's Data Protection Officer. Requests to access your child's educational record may require their consent.

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance to information.governance@franklin.ac.uk. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/make-a-complaint

Raising a Data Protection Complaint – (Collecting, Using, Storing or Sharing Personal Data)

Individuals have the right to raise a complaint about how the Trust collects, uses, stores or shares personal data. The Trust will handle all data protection complaints in accordance with the requirements of the Data (Use and Access) Act 2025 and guidance issued by the Information Commissioner's Office (ICO).

Complaints can be submitted through the Trust to any of the following ways:

- Data Protection Officer (DPO)
- Email: information.governance@franklin.ac.uk

- Postal Address: [Data Protection Officer, Franklin College Trust, Chelmsford Avenue, Grimsby, DN34 5BY]

Data Protection Complaint Handling Process

- The Trust will provide individuals with clear and accessible ways to make a data protection complaint (as identified above).
- All complaints will be acknowledged within 30 calendar days of receipt.
- The Trust will investigate complaints without undue delay and make appropriate enquiries to establish the relevant facts.
- Individuals will be kept informed of the progress of their complaint and any significant developments during the investigation.
- Where necessary, the Trust will take corrective action to address identified issues or breaches.
- The Trust will communicate the outcome of the complaint to the individual without undue delay, including details of any actions taken.
- If an individual remains dissatisfied, they will be informed of their right to raise the matter with the Information Commissioner's Office (ICO).

CCTV

CCTV recordings are used and retained for a limited period to ensure the safety of student applicants, students, parents/guardians, staff and visitors to the Trust. Access to view and monitor these recordings is limited to the appropriate staff who will report and act accordingly if suspicious or inappropriate actions or behaviours are identified. CCTV images may be passed on to the police for the purposes of crime detection or prevention, and Franklin Trust will also disclose CCTV footage when requested by insurance companies. CCTV may be used to assure the integrity of our examination arrangements, with footage shared with Awarding Organisations for audit and fraud prevention purposes.

How We Store Your Data

Your personal data will be stored securely and only for as long as necessary to fulfil the purposes for which it was collected, or as required by law. We implement appropriate technical and organisational measures to protect your data from loss, misuse, or unauthorised access.

Who We Share Your Data With

We may share your data with the following parties as required. The points below are not an exhaustive list, and may include other parties of who we share your data with, where appropriate – if you have any questions, please contact the Data Protection Officer:

1. **Internal Staff**: Trust staff involved in your child's education and support services and if our Trust policies allow it.
2. **Regulatory Authorities**: Relevant educational authorities, including the Department for Education (DfE), Education & Skills funding Agency (ESFA) or Ofsted, for reporting and compliance purposes and Local Authorities.
3. **Trips, Careers and Work Placements:** Where your child may attend a Trust trip, a work placement
4. **Health and Emergency Services**: In the event of an emergency, we may share relevant information with emergency services or health, well-being and safeguarding professionals and services including Social Services and the Police.
5. **Legal or Regulatory Bodies**: If required by law or to protect our legal rights, we may share your data with authorities, such as the police or a court of law.
6. **We occasionally share parent information with:** Civica (student record system), Auditors, Insurers or other appropriate consultants.
7. **Any third party that the Trust deems appropriate**: for example (scanning bureau).

Before sharing your data with a party, we will either obtain your consent or establish that the sharing is necessary (which includes ensuring that the data shared is kept to a minimum), fair and otherwise within the law.

We will not pass your information to third parties for them to contact you directly for their own marketing purposes.

Data collection requirements
To find out more about the data collection requirements placed on us by the Department for Education, for example; via the Individualised Learner Record (ILR) go to https://www.gov.uk/education/further-education-financial-management-and-data-collection

Below is the link to the DfE Privacy Policy which provides further information about how they use student data. https://guidance.submit-learner-data.service.gov.uk/23-24/ilr/ilrprivacynotice

How to Contact Us
If you have any questions or concerns about how we process your personal data, please contact:
Data Protection Officer
Email: information.governance@franklin.ac.uk
Telephone number: 01472 875000

Changes to This Notice
This Privacy Notice is subject to change. We may update this Privacy Notice from time to time to reflect changes in our practices or legal requirements.