Privacy Notice – Students

Franklin College Trust is committed to protecting and respecting the privacy of all our student's personal data whilst at Trust and once you 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.

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), previous school, parental contacts, vehicle registration details.
2. **Characteristics**: Such as ethnicity, language, nationality, country of birth.
3. **Academic Information**: Previous school records and Trust information such as performance, support requirements, qualifications on entry and actual predicted grades, attendance records (e.g. sessions attended, absences and reasons for absences), exam results, assessments, progress data and when you are enrolling for post 16 qualifications.
4. **Special Educational Needs and Disabilities (SEND)**: If applicable, information about any special educational needs or disabilities if this has been disclosed to us.
5. **Emergency Contact Information**: Name and contact details of an emergency contact.
6. **Financial Information**: Information related to funding, grants, or other financial support, if applicable, including Free school meal eligibility.
7. **Health and Wellbeing Data**: Any medical conditions, allergies, safeguarding information or health needs you may have disclosed to us.
8. **Post Trust progression/destination information:** Photographs, videos or testimonials, for marketing or educational purposes. This includes but is not limited to Trust printed publications, digital use on the Trust website and social media channels or any other suitable forum the Trust deems acceptable. Additionally, this information may be shared with previous schools, employers and any other appropriate third parties. These may also be used once you have left the Trust.
9. **Photographs and Video**: Photographs, videos or testimonials for example, during Trust activities or Trust related events for marketing or educational purposes. Including photograph of student ID badge. 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 previous school, employers and any other appropriate third parties. These may also be used once you have left the Trust.
10. **Behavioural Data**: Information related to your behaviour and conduct prior to joining the Trust and whilst at the Trust.
11. **The Learning Records Service will provide us with your unique learner number (ULN)** and may provide us with details about your learning or qualifications.
12. **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:

Privacy Notice – Students

1. **To Provide Educational Services**: To manage your enrolment, register you for courses, assess your academic performance, assess your suitability for a programme of study and provide you with appropriate teaching, tutoring, and support services, including assessing the quality of Trust services.
2. **To Monitor Progress and Achievement**: To assess your academic performance, track progress whilst being at the Trust and when you have left the Trust and support your learning.
3. **To Provide Health and Welfare Support**: To provide appropriate student support, care, pastoral care and guidance including in the event of an emergency or if you require any special assistance.
4. **To Manage Attendance**: To track and monitor your attendance at the Trust.
5. **To Communicate with You and your parents/guardians**: To send you and your parents/guardians important information about your course, timetables, assessments, progress and Trust events for example.
6. **To Comply with Legal Obligations**: To meet legal and statutory requirements such as safeguarding, SEND, health and safety, and financial auditing and comply with the law regarding data sharing.

The Trust will also share certain information about students aged 16+ with the local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996. This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers
- Disclosure and Barring Service (DBS).

For more information about services for young people, please visit the local authority website.

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.

Why does the Trust collect and use student information?
The Trust collects and uses student information. The lawful basis on which we use this information is that we collect it as part of our public interest task of providing education to you. This allows us to collect the information we need on behalf of the government to draw down funding on your behalf. We collect and use student information under Article 6 (1). of the UK General Data Protection Regulation 2018 (GDPR) where:

• processing is necessary for the performance of the contract the student signs with the Trust on enrolment.
• processing is necessary for compliance with a legal obligation to which the controller is subject.

• processing is necessary to protect the vital interests of the data subject.
• processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
• processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
• the data subject has given consent to the processing of their personal data for one or more specific purposes (this relates to data used only for direct marketing, for example the use of photographic images

/ participation in videos / case studies for marketing purposes only).

We also collect and use student information which is defined as a special category of personal data under Article 9 (2). of the GDPR 2018, such as biometric and ethnicity data. We also define other sensitive data as a special category, (this list is not exhaustive) for example SEND data, financial support (bursary) information and whether a young person is looked after.

Processing is necessary for the purpose of carrying out obligations under employment and social security and social protection law.

Franklin College Trust is required to share information about its students with the DfE under regulation 5 of The Education (Information about Individual Students) (England) Regulations 2013.

The DfE and the EFSA have robust processes in place to ensure the confidentiality of Trust data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data.

To be granted access to student information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data. For more information about the Department for Education's data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

To contact DfE: https://www.gov.uk/contact-dfe

Lawful Basis for Processing Your Personal Data
We rely on the following lawful bases to process your personal data. The points below are not an exhaustive list, and may include other lawful basis for processing your personal data where appropriate – if you have any questions, please contact the Data Protection Officer:

1. **Performance of a Contract**: The processing of your data is necessary to fulfil our contract with you (e.g., your enrolment at the Trust).
2. **Legal Obligation**: We may process your data to comply with legal obligations (e.g., attendance and safeguarding regulations).
3. **Consent**: In some cases, we may ask for your consent.
4. **Legitimate Interests**: We may process your data for legitimate interests, such as improving services and communications.

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 students have the right to request access to information about them 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.
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

Collecting student information
Whilst the majority of student information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

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].

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- Data Protection Officer (DPO)
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- 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).

Privacy Notice – Students

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 Trust premises. 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 College 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 education and support services.
2. **Third-Party Providers**: External organisations that provide educational or administrative services, such as previous schools, the Joint Council of Qualifications (JCQ), UCAS (university applications), student work experience providers, Career Services (for example linked to destinations and progression data), RCU, Apprenticeship services, Lloyds Bank PLC, GroFar Software, educational providers that students attend before starting at the Trust and those after leaving us, examination boards, online training providers, Evolve, Microsoft, Google, First Media Ltd, PPP Marketing Ltd, Sowden and Sowden Ltd, data analysis providers or IT support.
3. **We routinely share your information with Data Processors who enable the Trust to provide services:** such as ALPS, Sixth Sense Analytics, MIDES, UniFrog.
4. **Regulatory Authorities**: Relevant educational authorities, including the Department for Education (DfE), or Ofsted, for reporting and compliance purposes and Local Authorities.
5. **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.
6. **Learning Record Service** – ULN is shared in order that we can access achievement information which avoids having to provide evidence for enrolment or progression
7. **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.
8. **Parents/guardians**
9. **Contacts that have been provided as part of the enrolment**
10. **We occasionally share student information with:** Civica (student record system), HE partners, Auditors, Insurers or other appropriate consultants.

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

Privacy Notice – Students

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.