

STUDENT PRIVACY POLICY

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Who are we?

Sir George Monoux College
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Sir George Monoux College (the “College”) is a sixth form college, which offers educational services tailored to 16-19 year olds.

The College collects and processes personal data relating to its learners to effectively manage your learning and to meet its statutory obligations as a sixth form College. Sir George Monoux College is committed to being transparent about data it collects, the uses of that data, and to meeting its data protection obligations.

We are committed to protecting the privacy of our learners. We want to provide a safe and secure service when dealing with your personal information. Personal information means data that identifies you personally such as your name, date of birth, photo or contact details. It includes data that when combined with other pieces of information will be able to identify you.

Quick Guide to Contents

- **What personal information do we collect about you?**
- **Why do we collect and process your data?**
- **How do we use your personal information?**
- **How long do we keep your personal information for?**
- **Who do we share your personal information with?**
- **What happens if you do not provide us with the information we request?**
- **Do we make automated decisions concerning you?**
- **Do we transfer your personal information outside the UK?**
- **What are your rights?**
- **Accessing your data with us**
- **How do we contact you?**
- **How do you contact us?**

What personal information do we collect about you?

We collect and process your information in the following ways:

Information you give us

- Details about yourself including your name, date of birth, gender and ethnic group
- Contact details – Address, telephone, mobile numbers and Email address
- Details of your employment and educational history
- Information about your nationality and residency, and previous address if applicable (including arrival in the UK, years living in EU, asylum seeker status.)
- Information about medical or health conditions, including whether or not you have a learning difficulty or disability
- Safeguarding/Welfare details e.g. Care Leaver, Young Parent etc.
- Household income information
- Criminal convictions
- Parent/carer details – name and contact details
- Emergency contacts
- Photo – used for ID cards
- Video/Images – for lesson capture, photographic documentation, video evidence of work, field based activities, exhibitions/shows/concerts, etc.
- GCSE and other previous qualifications
- Destination Data after you leave college

Information we receive from third parties

- Details of your previous qualifications from Learner Record Service (LRS)
- Unique Learner Number from LRS
- Reference from your previous school(s) or colleges
- Support and EHCP from previous schools or your borough
- To understand support needs or where there is a cause for concern or welfare. These may include (but not limited to) Police, Social Services or Youth Services.

Why do we collect and process your data?

We collect and process personal data under the UK Data Protection Act 2018 (“DPA 2018, “2018 Act” or the “Act”) and the UK General Data Protection Regulation (“UK GDPR” or “GDPR”) Article 6.1(c) (Legal Obligation), and 6.1(e) (Public Task) in order for us to carry out our public task to provide education and training. They are necessary in order to meet our legal obligations with the DfE and ESFA. It is also used to monitor the effectiveness of the services we provide. e.g. to monitor attendance, performance and achievement at college.

We collect data about criminal convictions in order to protect vital interests of others under GDPR Article 6.1(d) (Vital Interest) and also in order to carry out our duty to support those with a conviction under GDPR Article 6.1(e) (Public Task)

We collect emergency contacts GDPR Article 6.1(d) (Vital Interests). This is used solely in the event of an emergency.

We collect parent/carer details at the start of the academic year under GDPR Article 6.1(e) (Public Task) in order to fulfil our duty to support the education and learning of students as fully as possible

Household income data is collected from students who wish to apply for free college meals and bursary.

How do we use your personal information?

- **To provide a requested service or carry out a contract with you.**

Monoux College needs to process data so we can provide you with the highest standards of education and training we are able to give, and to meet our legal obligations from government organisations including the DfE. Data regarding employment status and benefits is required to assess your eligibility for free meals and bursary support.

We also process other special categories of personal data, such as information about ethnic origin, disability or health, for the purposes of equal opportunities monitoring and monitor our service provision to improve our services to specific groups. We also use the data so we can personalise the provision to you to provide you with the best possible opportunities to succeed.

- **Where we have your consent**

Students will be able to consent by opting-in for the College to use their personal details such as photos for marketing purposes e.g. in the College's prospectus or advertising campaigns, or contact details to inform students of events happening in the College. Students can withdraw consent to use personal details for marketing purposes at any time by contacting the Student Information Centre (SIC) or the Data Protection Officer (DPO).

- **Where we have a legitimate interest**

- In order to protect the student and their family's welfare in cases of safeguarding, the College has legal duties and legitimate interests to provide safeguarding information to welfare organisations
- The College will share attendance, performance and achievement data to support our duty towards the education and learning of students as fully as possible

- **Where we have a legal obligation**

- The College needs to process personal data of students to comply with its legal obligation with DfE/EFSA. Your information may be shared internally, including with any team or department who need the data to provide services to you. This will include special categories of data where appropriate. The College will share attendance, performance and behaviour data with parents to support our duty towards the education and learning of students.
- Where Monoux College engages non-statutory third parties to process personal data on its behalf, we require them to do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.
- The College shares your data with third parties where there is a legal obligation, including ESFA, Learner Records Service (LRS) and Waltham Forest Council and other local borough councils.

- We also share information with specified bodies where we may receive grant funding or engage in a partnership to improve services for students.

How long do we keep your personal information for?

We keep your information for the following periods:

Student and Enrolment information: 6 years from the start of your studies with the college

Student and Parent contact details: 6 years from the start of your studies with the college

We would also retain basic information to contact ex-students for alumni purposes, and alumni can withdraw their consent at any time and will be removed from our alumni processes.

Who do we share your personal information with?

We share your personal information with trusted third parties to provide services that you have requested such as ESFA, Learner Records Service (LRS) and Waltham Forest Council. These third parties comply with similar policies of privacy and confidentiality.

We share your personal information with third parties who perform functions on our behalf and who also provide services to us such as Association of Colleges. Professional advisors and IT consultants carrying out testing and development work on our technology systems may process your data. These third parties comply with similar policies of privacy and confidentiality.

Where required, we share personal data with employers to comply the contractual obligations of the ESFA for work placements in study programmes.

Where required we share your personal information with third parties to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms of Use or other applicable policies; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the our website, our business or the public.

Where applicable, we would also share progression and destination data with your previous school.

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal information necessary to meet the contractual and legal obligations, or if you withdraw consent for the processing of your personal information, where this information is necessary for us to provide services to you, we will not be able to enrol you as a student.

If you do not provide other information (except that requiring consent), for example, learning difficulty information, may result in the College being unable to provide the standard of service we would wish to provide.

If you do not provide us with the details of a criminal conviction you hold when applying to the college or whilst you are a student at the college, we may remove your place at college.

Do we make automated decisions concerning you?

No, we do not carry out automated decision-making.

Do we use Cookies to collect personal data on you?

To provide better service to you on our websites, we use cookies to collect your personal data when you browse the website. No personally identifiable information is collected. See our cookie policy [on our website](#) for more details.

Do we transfer your personal information outside the UK?

No, we do not transfer personal information out of the UK. But there may be occasions where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside the or outside the European Union.

What are your rights?

By law, you have a number of rights when it comes to your personal information. If you need some independent advice or need to make a complaint about data protection, privacy or data sharing issues, you can contact the Information Commissioner’s Office (ICO) at:

Information Commissioner’s Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit ico.org.uk or email casework@ico.org.uk.

Rights

What does this mean?

1. The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted about potential opportunities).
2. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Policy.
3. The right of access	You have the right to obtain access to your information (if we are processing it). This is so you are aware and can check that we are using your information in accordance with the data protection law.
4. The right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.
5. The right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
6. The right to restrict processing	You have rights to restrict further use of your information. When processing is restricted, we can still store your information, but may not use it further.
7. The right to data portability	You have rights to obtain and reuse your personal information for your own purposes across different services.

	For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal information with Information Commissioner's Office.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information for marketing purposes.

Accessing your data with us

If you need to access your data we hold about you, you can make a request. We usually act on Data Subject Access Requests and provide the information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it.

Generally, we will respond within one month of the date we receive your request but, if the request is going to take longer to process, we will inform you of this.



How will we contact you?

We may contact you by post, phone, SMS, or email. If you prefer a particular contact means over another please let us know.

How can you contact us?

If you have any enquires you can contact us at dpo@sgmc.ac.uk or by writing to the Data Protection Officer at Sir George Monoux College, 190 Chingford Road, London E17 5AA.