

**Scope**

Privacy notice for learning support services

The Together Trust is committed to protecting your privacy when you make contact with us and use any of our services. The following privacy notice explains how we use, store and protect the information we have about individuals accessing our learning support services under the General Data Protection Regulation (GDPR).

The Together Trust has a Data Protection Officer under the GDPR who can be contacted; By email: [dataprotection@togethertrust.org.uk](mailto:dataprotection@togethertrust.org.uk)  
Or by writing: DPO, Together Trust Centre, Schools Hill, Cheadle, SK8 1JE

**Who we are**

The Together Trust is a charity that offers care, support and special education to children, adults and families.

The Together Trust's learning support service supports individuals aged 16 – 26 years, who may have been prohibited from attending further education due to complex needs and/ or disability, to access education and achieve their aspirations.

**The personal data we hold**

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Student and curricular records
- Characteristics, such as ethnic background or special educational needs
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs/films
- CCTV images captured in College

We may also hold data about individuals that we have received from other organisations, including other schools, local authorities and the Department for Education.

**Why we use this data****We use this data to:**

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research

### Our legal basis for using this data

We only collect and use individuals' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We have a legitimate interest (i.e. to facilitate learning) to process this data.

Less commonly, we may also process students' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's (or another persons') vital interests (i.e. in a medical emergency).

Where we have obtained consent to use students' personal data (i.e. photographs), this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using students' personal data overlap, and there may be several grounds, which justify our use of this data.

### Collecting this information

While the majority of information we collect about individuals is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from individuals we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

### How we store this data

We keep personal information about individuals while they are attending our school. We may also keep it beyond their attendance at our college if this is necessary in order to comply with our legal obligations.

Most information about individuals is kept for 7 years from their leaving date. We keep this information in line with our statutory duty under the Limitations Act, 1980.

You can request our full retention schedule by contacting our Data Protection Officer.

### Data sharing

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- Our local authorities – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Education Establishment (Bolton College)
- The Department for Education (such as for the Pupil National Database)
- The student's family and representatives
- Educators and examining bodies
- Suppliers and service providers – to enable them to provide the service we have contracted them for. This can include third party "cloud computing" services.
- Survey and research organisations
- Health authorities and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Government departments (e.g. Education Funding Agency)

### **Transferring data internationally**

If we ever have to transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### **Parents and students' rights regarding personal data**

Individuals have a right to make a 'subject access request' to gain access to personal information that the college holds about them.

Parents/carers can make a request with respect to student's data, where the individual does not have the mental capacity to make decisions for themselves and they are the legal representative, or where the student has provided consent.

If you make a subject access request, and if we do hold information about you or the student, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information

Individuals also have the right for their personal information to be passed electronically to other organisations in certain circumstances.

### **Other rights**

You also have other rights regarding how your personal data is used and kept safe. The Together Trust has produced a guide 'Know your rights' to explain these in more detail. To exercise any of these rights please contact our Data Protection Officer.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance by contacting our Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

- By email: [dataprotection@togethertrust.org.uk](mailto:dataprotection@togethertrust.org.uk)
- Or by writing: DPO, Together Trust Centre, Schools Hill, Cheadle, SK8 1JE