





**SB – Safe Opportunities Privacy notice for students and their families**

Signed by:

*Helen Pullan*

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Company Director

Date: 24<sup>th</sup> August 2023

## Privacy notice – how Safe Opportunities uses student information

### What categories of information are processed?

The categories of personal information that we process include the following:

- **Personal identifiers and contacts** – e.g. name, unique student number, contact details and address
- **Characteristics** – e.g. ethnicity, language and eligibility for free school meals
- **Safeguarding information** – e.g. court orders and professional involvement
- **Special educational needs and disabilities (SEND) information** – e.g. any additional needs
- **Medical and administration** – e.g. doctors' information, general health, dental health, allergies, medication and dietary requirements
- **Attendance** – e.g. sessions attended, number of absences, reasons for absences and any previous schools you have attended
- **Assessment and attainment** – e.g. any relevant test and exam results
- **Behavioural information** – e.g. exclusions and any relevant alternative provision put in place

### Why do we collect and use your information?

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

- To support student learning
- To monitor and report on student attainment and progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To keep students safe
- To meet legal duties placed on us by the government

Safe Opportunities only process data if at least one of the 6 Lawful Basis from Article 6 apply.

For special category data, Safe Opportunities would follow advise from the ICO as outline on the website : [What are the rules on special category data? | ICO](#)

### How do we collect your information?

We collect your personal information via the following methods:

- Referral forms and health forms
- Information from students' previous or current school/ education provider
- Child protection plans
- EHCP

Student data is essential for Safe Opportunities' operational use. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

### **How do we store your information?**

We hold your personal information securely for the set amount of time shown in the Safe Opportunities' Records Management Policy.

For more information about how we keep your information safe, please see Safe Opportunities' Data and Cyber-security Breach Prevention and Management Plan.

Data security measures

- Secure website with SSL security functions installed
- Two – factor authentication
- Automatic password update function

### **Who do we share your information with?**

We routinely share your information with:

- The local authority (LA)
- The Department for Education (DfE)/ ESFA
- Schools/colleges/apprenticeship providers that you go to after leaving us
- Youth support services
- Subcontractors eg Grow and Achieve for job coach support
- Health services where necessary

### **Why do we share your information?**

We do not share information about you with anyone without your consent, unless the law and our policies allow us to do so.

### **Youth support services**

Once our students reach the age of 13, we also pass student information to our LA and/or provider of youth support services because they have responsibilities in relation to the education or training of 13- to 19-year-olds under section 507B of the Education Act 1996.

Sharing this information allows them to provide the following services:

- Youth support services
- Careers advisers
- -16 education and training providers

The information we share is limited to the student's name, address and date of birth; however, where a parent or guardian has provided their consent, other relevant information will be shared – this right to consent is transferred to students once they reach 16 years old.

We securely transfer information to the youth support services via the following method:  
Egress secure email systems

The youth support services stores and retains this information in line with their policies as detailed on Cheshire East and West Websites.

### **Department for Education (DfE)**

The DfE collects personal information from us and our LA through various collections the school is required to undertake legally. We are required to share information about students with the DfE either directly or via our LA for the purpose of those data collections, under:

Safe Opportunities' shares information with ESFA for students funded via the Supported Internship Programme.

- Section 3 of The Education (Information About Individual Students) (England) Regulations 2013
- Regulation 5 of The Education (Information About Individual Students) (England) Regulations 2013

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework,, which can be found by following this link:  
<https://www.gov.uk/government/publications/security-policy-framework>

### **How does the government use your data?**

The student data that we lawfully share with the DfE through data collections:

- Underpins funding, which is calculated based upon numbers of students and their characteristics in each education provider.
- Informs 'short-term' education policy monitoring and school accountability and intervention.
- Supports 'longer-term' research and monitoring of educational policy, e.g. how certain subject choices go on to affect education or earnings beyond school.

To find out more about the data collection requirements placed on us by the DfE, e.g. via the school census, follow this link: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

### **The National Student Database (NPD)**

Much of the data about students in England goes on to be held in the NPD.

The NPD is owned and managed by the DfE and contains information about students in schools in England – it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE.

Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link: <https://www.gov.uk/guidance/how-to-access-department-for-education-dfe-data-extracts>.

### **Sharing by the DfE**

The DfE is legally allowed to share students' personal information with certain third parties, including the following:

- Schools
- LAs
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.

For more information about how the DfE collects and shares student information, you can look at the information in the following two links:

- <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>
- <https://www.gov.uk/government/publications/dfe-external-data-shares>

### **How to find out what personal information the DfE holds about you**

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

## What are your rights?

You have specific rights to the processing of your data; these are the right to:

- Request access to the information Safe Opportunities holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information that we hold about you, please contact the Data Protection officer (DPO) Helen Pullan – [HelenPullan@safeopportunities.co.uk](mailto:HelenPullan@safeopportunities.co.uk).

If you are concerned about the way we are collecting or using your information, please raise your concern with the DPO in the first instance. You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

## How to withdraw consent and lodge complaints

Where Safe Opportunities processes your personal data with your consent, you have the right to withdraw your consent.

If you change your mind or are unhappy with how Safe Opportunities uses your personal data, you should let us know by contacting the DPO, Helen Pullan at [Helenpullan@safeopportunities.co.uk](mailto:Helenpullan@safeopportunities.co.uk)

## Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. Safe Opportunities will ensure that the most up to date privacy notice is on the website for students to access.

This privacy notice was last updated on 24/08/2023

## How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact Helen Pullan on [helenpullan@safeopportunities.co.uk](mailto:helenpullan@safeopportunities.co.uk)

If you require further information about how we and/or the DfE store and use your personal data, please visit our website, the Gov.UK website, (<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>).

