



Privacy Notice - Students

December 2025

Reviewed by Executive Team:	November 2025
Endorsed by [committee]:	N/A
Approved by Board:	9 December 2025
Next review	Autumn 2026

1. Introduction

1.1 Under UK data protection law, individuals have a right to be informed about how our Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

1.2 This Privacy Notice explains how we collect, store, and use personal data about **students at the College and schools within the Trust.**

1.3 Our trust, Horsham Learning Alliance (the Trust), Hurst Road, Horsham, RH12 2EJ, 01403 210822, is the 'data controller' for the purposes of UK data protection law.

1.4 We will comply with the data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

1.5 The Trust is the data controller and as such student data and consent may be shared between the college/school in the Trust, for the purposes of students moving between settings in the Trust.

1.6 Should the Trust require processing data beyond the purposes given at the time of collection, parents/carers/students will be informed and consent will be required again.

2. Legislative Framework

2.1 Privacy notices are covered in the United Kingdom by The UK GDPR and the Data Protection Act 2018 (DPA 2018) legislative framework. This says that personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

2.2 This Privacy Notice is for information only and it is not a contractual agreement.

3. The personal data we hold

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

- Your name
- Contact details
- Personal details such as date of birth, next of kin and emergency contact numbers
- Test results, details about your learning and what you have achieved at college/school
- Attendance records
- Details of any behaviour issues or exclusions
- Information about your use of our information and communications systems, equipment and facilities (e.g. college/school computers)
- Biometric information, where applicable

3.2 We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about characteristics, such as ethnic background or any special educational needs (SEN)
- Photographs and CCTV images captured in college/school

3.3 We may also hold data about you that we have received from other organisations, including other schools and local authorities.

4. Why we use this data

4.1 We collect and use the data listed above to:

- a) Get in touch with your parents/carers when we need to
- b) Check how you are doing in exams and work out whether you or your teachers need any extra help
- c) Track how well the whole college/school is doing
- d) Look after your wellbeing and keep you safe
- e) Answer your questions and complaints
- f) Meet legal requirements placed upon us
- g) Publish statistics, for example, about the number of students in our schools/college
- h) Make sure our information and communications systems, equipment and facilities (e.g. college/school computers) are used appropriately, legally and safely

4.2 We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal

information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

4.3 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4.4 Where you have given us consent to do so, we may send you messages by email or text promoting college/school events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by selecting the 'Unsubscribe' link at the bottom of any such communication, or by contacting us.

4.5 We do not currently process any student personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

4.6 While you're in college/school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. college/school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your welfare

5. Our lawful basis for using this data

5.1 Our lawful basis for processing your personal data for the purposes listed above are as follows:

- For the purposes of all bullet points above a-e, in accordance with the 'public task' basis – we need to process data to fulfil our statutory functions as a Trust
- For the purposes of c, f, g, above, in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law as set out here:
- For the purposes of a, d, e, f, above, in accordance with the 'consent' basis – we will obtain consent from you to use your personal data
- For the purposes of a, d, above, in accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation
- For the purposes of b, c, h, above, in accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us

5.2 Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you will go about withdrawing consent if you wish to do so.

6. Our basis for using special category data

6.1 For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

6.2 For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

7. Collecting Data

7.1 We will only collect and use your data when the law allows us to, as detailed above. While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

7.2 Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

7.3 Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals
- Other schools or Trusts
- Department for Education

8. Storing Data

8.1 We keep personal information about you while you attend a college/school within our Trust. We may also keep it after you stop attending a college/school in our Trust, if this is necessary to comply with our legal requirements or to meet our regulatory requirements. Our Data Retention Policy sets out how long we keep information about students.

8.2 You may request a copy of the data stored on you by contacting the local college/school Data Lead, or the Trust Data Protection Officer.

8.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

8.4 We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

9. Who we share data with

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

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

- Our local authority, West Sussex County Council, – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Schools/colleges that you attend after leaving us
- Government departments or agencies
- Department for Education
- Our regulator, e.g. Ofsted
- Youth support services provider/s
- Suppliers and service providers such as catering provider, MIS provider, network provider etc. to enable them to provide the service we have contracted them for
- Financial organisations
- Our auditors
- Survey and research organisations

- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts or tribunals

The Department for Education (DfE)

9.3 We must share information about you with the Department for Education (a government department) either directly or via our local authority, via various statutory data collections.

9.4 The data shared will be in line with the following legislation:

- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

9.5 The data is transferred securely and held by the Department for Education under a combination of software and hardware controls that meet the current government security policy framework.

9.6 The data we share about you with the Department for Education is used for several different purposes, including to:

- Help decide the amount of money that our school receives
- Monitor how well the education system is working and how well our school is doing in terms of educating our students
- Support research

9.7 The information shared with the Department for Education about you could include:

- Your name and address
- Your unique learner number
- Pupil matching reference numbers
- Details of your gender or ethnicity
- Details of any special educational needs (SEN)
- Details of schools attended
- Absence and exclusion information
- Information relating to exam results
- Information relating to any contact with children's services
- What you have done since finishing school

Please note: this list is not exhaustive.

9.8 Once students in our school reach the age of 13, we are legally required to pass on certain information to the local authority or youth services provider, which has responsibilities regarding the education or training of 13 to 19 year olds under section 507B of the Education Act 1996. Parents/carers, or students if aged 16 or over, can request that only their name, address and date of birth be passed to these agencies by informing the DPO.

National Pupil Database (NPD)

9.9 We must provide information about you to the Department for Education as part of data collections such as the school census.

9.10 Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

9.11 The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

9.12 The Department for Education may share information from the database with other organisations, such as organisations that promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

9.13 You can find more information about this on the Department for Education's webpage on [how it collects and shares personal data](#). You can also [contact the Department for Education](#) if you have any questions about the database.

10. Your rights

10.1 How to access personal information that we hold about you

10.1.1 You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

10.1.2 If you make a subject access request, and if we do hold information about you, we will (unless there's a really good reason why we shouldn't):

- Give you a description of it
- Tell you why we are holding it, how we are using it, and how long we will keep it for
- Explain where we got it from, if not from you
- 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 (decisions made by a computer or machine, rather than by a person), and any consequences of this
- Give you a copy of the information in an understandable form

10.1.3 You may also have the right for your personal information to be shared with another organisation in certain circumstances.

10.1.4 If you would like to make a request, please contact us in writing.

10.2 Your other rights regarding your data

10.2.1 Under data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

- Say that you don't want your personal information to be used

- Object to the processing of personal data that is likely to cause, or is causing, damage or distress
- Stop it being used to send you marketing materials
- Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach
- Make a complaint to the Information Commissioner's Office (ICO) if you feel we have not used your information in the right way
- Claim compensation if the data protection rules are broken and this harms you in some way

10.2.2 We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to the use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

10.2.3 See information on types of lawful basis in section 4 of this Privacy Notice.

10.2.4 To exercise any of these rights, please contact us in writing.

11. Monitoring

11.1 The Trust reserves the right to update this Privacy Notice at any time. The current version of our Privacy Notice will be published online.

12. Queries and Complaints

12.1 We take any complaints about how we collect and use personal information very seriously.

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

12.3 You can make a complaint to us at any time by contacting Data Protection Officer, Horsham Learning Alliance, 82 Hurst Road, Horsham, RH12 2EJ, or by contacting the Executive Principal/Headteacher of your College/school.

12.4 Alternatively, you can make a complaint at any time to the Information Commissioner's Office:

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