

Student Privacy Notice

What is the purpose of this document?

Treloar Trust is committed to protecting the privacy and security of your personal information.

This privacy notice explains how we collect, use, store and share personal information about students during their time at Treloar's and after they leave. It applies to all students in the School and College, regardless of funding arrangements.

Treloar Trust is the Data Controller for the personal information we process. This means we are responsible for deciding how we collect, hold, use and protect personal information.

This notice applies to both current and former students. It does not form part of any contract and may be updated from time to time.

It is important that you read this notice together with any other privacy information we provide when collecting or processing personal information so that you understand how and why we use your information.

Our Data Protection Officer can be contacted at:

Email: dpo@treloar.org.uk

Telephone: 01420 547400 ext. 3423

Data Protection Principles

We will comply with data protection law. This means that personal information we hold about you must be:

- Used lawfully, fairly and transparently.
- Collected only for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Kept only for as long as necessary.
- Kept securely and protected against unauthorised or unlawful access, disclosure, loss or damage.

The kind of information we hold about you

Personal information means information from which an individual can be identified.

We may collect, store and use the following categories of information:

- Characteristics such as ethnicity, language, nationality, country of birth and free school meal eligibility.
- Next of kin and emergency contact information.
- Contact details for parents, guardians and relevant professionals.
- Attendance information, including absences and reasons for absence.
- Educational assessments, achievements and progress information.

- Healthcare assessments and outcomes.
- Relevant medical information, including disabilities, medication and medical notes.
- Medical correspondence and reports.
- Therapy information and records, including occupational therapy, physiotherapy, speech and language therapy, dietetics, visual impairment support and counselling.
- Special educational needs information.
- Behaviour information, including exclusions, incidents and behaviour support plans.
- Care plans and personal care requirements.
- Photographs used for educational, care or identification purposes.
- Funding and payment information where applicable.
- Safeguarding and child protection information

Why we collect and use this information

We use student information to:

- Support learning and educational progress.
- Safeguard and protect students.
- Monitor and report on student development and outcomes.
- Provide appropriate care, health and therapeutic services.
- Deliver educational, residential and support services.
- Assess and improve the quality of our services.
- Meet legal, regulatory and funding obligations.
- Support transition planning and future outcomes.

The information supplied may also be used by the Education and Skills Funding Agency (ESFA), acting on behalf of the Department for Education (DfE), to issue a Unique Learner Number (ULN) and maintain a Personal Learning Record.

Further information is available from the Department for Education's Learning Records Service Privacy Notice.

The lawful basis on which we use this information

Treloar's processes personal information under the requirements of:

- The Education Act 1996.
- The Education and Skills Act 2008.
- The UK General Data Protection Regulation (UK GDPR).
- The Data Protection Act 2018.
- Other legislation and statutory guidance relating to education, care, safeguarding and health services.

Where special category information is processed, we rely on the additional legal conditions permitted under data protection law for education, safeguarding, health, social care and public interest purposes.

Collecting student information

Most of the information we collect about students is required by law, contractual arrangements, regulatory requirements or funding obligations. Where information is voluntary, we will explain this when the information is collected.

Use of Artificial Intelligence, recording and Transcription Technologies

Treloar's may use approved Artificial Intelligence (AI), recording and transcription technologies to support education, care, therapy, safeguarding, administration, quality assurance and service improvement activities.

Treloar's preferred AI platform is Microsoft Copilot operating within the Trust's Microsoft 365 environment

These technologies may be used to:

- Assist staff in producing summaries, reports and records.
- Support record quality and consistency checks.
- Produce meeting transcripts, summaries and action lists.
- Analyse trends and support service improvement activities.
- Assist accessibility and participation requirements.
- Support information governance and records assurance activities.

AI-generated content is treated as decision-support information and is reviewed by appropriately authorised staff before being relied upon.

Treloar's does not use AI to make solely automated decisions about students that produce legal or similarly significant effects without appropriate safeguards, human review and the rights provided under data protection legislation.

Where approved meeting recordings, transcripts or AI-generated summaries form part of a student's official education, care, therapy, safeguarding or administrative record, they may be retained as part of that record in accordance with Treloar's Retention of Records Policy.

Any use of AI, recording or transcription technologies will be undertaken in accordance with data protection, safeguarding, information governance and security requirements.

Storing student data

Treloar's retains student information for eight years after a student leaves Treloar's, or until the student reaches the age of 25, whichever is later.

Certain categories of information, particularly safeguarding information, may need to be retained for longer periods in accordance with legal, safeguarding, regulatory or operational requirements.

Retention periods are managed in accordance with Treloar's Retention of Records Policy.

Who we share student information with

We routinely share student information with appropriate internal staff and external healthcare agencies where this is necessary for educational, care, safeguarding or health-related purposes.

Information may be shared with:

- Schools, colleges or educational providers attended after leaving Treloar's.
- Local Authorities.
- The Department for Education (DfE).
- Health and therapy professionals involved in a student's care.
- The on-site GP service.
- Safeguarding, child protection and other statutory agencies where required.
- Other organisations where disclosure is required or permitted by law.

How we share student information

We may share personal and special category personal information with verified parents or guardians by email. Information shared in this way will be limited to what is necessary.

Where information is shared electronically with professional bodies, healthcare organisations, local authorities or other authorised organisations, secure methods such as secure portals or encrypted email will normally be used.

Why we share student information

We share information where there is a lawful basis to do so and where it is necessary for educational, safeguarding, care, health, funding, regulatory or legal purposes.

We are required to share information with the Department for Education and Local Authorities under various statutory requirements, including the Education (Information About Individual Pupils) (England) Regulations 2013.

Requesting access to your personal data as a Treloar's student

Under data protection legislation, students have the right to request access to personal information held about them.

Requests should be made to:

Emma Simmonds – Head of Admissions, Funding & Contracts
emma.simmonds@treloar.org.uk

Students also have the right to:

- Be informed about how their information is used.
- Request access to personal information.
- Request correction of inaccurate information.
- Request restriction of processing in certain circumstances.
- Request erasure where permitted by law.

- Object to certain types of processing.
- Object to solely automated decision-making and profiling where rights are provided under data protection legislation, and request human review where applicable.
- Request portability of personal data where the law provides this right.
- Complain to the Information Commissioner's Office (ICO).

Requesting access to student personal data as a parent of third party

A parent may make a request for personal data on behalf of a child under the age of 12 where they have parental responsibility.

Parents may also have rights to access educational records relating to children under 18 for whom they hold parental responsibility. Access to educational records is a separate legal right and is distinct from rights provided under data protection legislation.

Requests will be considered on a case-by-case basis, taking account of the student's age, understanding, legal rights and best interests. Educational records generally relate to educational provision and attainment and may not include health, care or other protected information

Complaints

If you have concerns about how Treloar's collects, uses or protects personal information, we ask that you contact us in the first instance.

You also have the right to complain to the Information Commissioner's Office (ICO).

Further information is available from the ICO.