Frank Field
Education Trust

Privacy notice for College Applicants and Students

Policy Information:

Date prepared	October 2026
Adopted by Board	October 2026
Implementation Date	Immediate
Frequency of Review	Annually
Review Date	October 2027

Approved by CEO:

Cath Green

Approved by Chair of Board:

David Wooff

Frank Field
Education Trust

Privacy Notice (How we use Students information)

Last updated: 7 October 2026
Version: 4
Document owner: DPO

1. About this notice

This privacy notice explains how and why Frank Field Education Trust ("the Trust", "we", "us") collects and uses personal information about prospective, current and former college learners, including sixth-form students, adult learners and apprentices where the Trust is the provider. It describes the information used, where it comes from, the purposes and lawful bases, recipients, retention, international transfers and information rights. It should be read with any just-in-time notice supplied for a particular service or activity.

The Trust is the controller because it decides the purposes and means of the processing described here. This notice does not create contractual rights and does not prevent the Trust from processing information where the law requires or permits it.

2. Contact details

Frank Field Education Trust can be contacted at 164 Whitby Road, Ellesmere Port, Cheshire CH65 6EA, by telephone on 0151 318 9700 or by email at info@ffet.co.uk . The Trust's ICO registration number is ZA590527.

The Data Protection Officer is Matthew Keeffe of Keeffe and Associates Ltd. The Data Protection Officer may be contacted through info@ffet.co.uk or 0151 318 9700. The Data Protection Officer advises and monitors compliance, but operational decisions remain with the Trust.

3. Data protection framework

The principal legislation is the UK General Data Protection Regulation and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. The 2025 Act amends rather than replaces the existing framework. The Trust also applies the Privacy and Electronic Communications Regulations 2003 where electronic marketing or storage and access technologies are used.

Processing must be lawful, fair and transparent; limited to specified purposes; adequate, relevant and limited to what is necessary; accurate; kept no longer than necessary; and protected by appropriate security. The Trust is responsible for demonstrating compliance.

4. Information collected and sources

Detailed categories and sources appear in Schedule 1. Information comes from applicants and learners and may also come from parents or carers where appropriate, previous educational settings, employers, awarding organisations, the Department for Education, funding bodies, the Learning Records Service, local authorities, health and support professionals, safeguarding partners, careers and placement providers, and Trust systems.

5. Why information is used

The Trust uses your information to:

- manage applications, admissions, enrolment and eligibility;
- deliver teaching, learning, assessment, examinations, qualifications and learner support;
- monitor attendance, progress, achievement and destinations;

- administer the Individualised Learner Record, Unique Learner Number, funding, bursaries,
- free meals, fees and apprenticeships;
- meet safeguarding, welfare, equality, SEND, health and safety and reasonable-adjustment duties;
- arrange placements, careers activity, transport, trips and enrichment;
- manage behaviour, complaints, academic integrity and disciplinary processes;
- protect premises, networks, accounts and information; and
- produce statistics, quality assurance, research and service improvement using personal or anonymised information as appropriate.

6. Lawful bases and required information

Schedule 2 sets out the principal lawful bases. Public task under Article 6(1)(e) and legal obligation under Article 6(1)(c) are central to education, safeguarding, funding and statutory returns. Article 6(1)(b) may apply to steps requested before enrolment or a specific learner contract. Vital interests may apply in a genuine emergency. Legitimate interests are used only for activities outside the Trust's public tasks after a balancing assessment. Consent is used for genuinely optional activities, such as specified non-essential publicity or marketing.

Information required for admissions, identity, eligibility, enrolment, funding, education delivery, safeguarding or legal compliance must be provided where applicable. If it is not provided, the Trust may be unable to process an application, enrol the learner, claim funding, provide support or meet a legal duty. Optional choices will be identified clearly.

7. Learners, parents and carers

Information rights belong to the learner. The Trust takes account of age, understanding, legal status, best interests and the circumstances when communicating with parents or carers. Naming a person as an emergency contact does not itself give that person access to the learner's records. Information may be shared with a parent or carer where the learner agrees, where safeguarding or welfare requires it, where the law permits or requires it, or where another lawful basis applies.

8. Special category and criminal offence information

Special category information includes information about health, disability, racial or ethnic origin, religious or philosophical beliefs, trade union membership, political opinions, genetic or biometric identification, sex life and sexual orientation. The Trust will identify both an Article 6 lawful basis and an Article 9 condition. Where required, it will also identify a Data Protection Act 2018 Schedule 1 condition and comply with its Appropriate Policy Document.

Criminal allegation, conviction, offence, barred list and related information is processed only under Article 10 were authorised by domestic law, including an applicable Data Protection Act 2018 condition. A DBS check or disclosure is requested only where the role or activity is eligible and the information is necessary.

9. Data sharing and processors

The Trust does not need consent every time information is shared. Sharing takes place where there is a lawful basis and is necessary, proportionate and secure. Before a non-routine disclosure, the Trust considers the recipient, purpose, authority, accuracy, data minimisation, confidentiality and secure transfer. Safeguarding information is shared in accordance with safeguarding law and guidance.

A processor handles information only on the Trust's documented instructions under a written contract containing the terms required by data protection law. Some recipients, including the Department for Education, local authorities, police, regulators, pension schemes and health bodies, may be separate controllers for their own statutory functions.

10. International transfers

Some approved service providers may store or access information outside the United Kingdom. Before a restricted transfer, the Trust will ensure that an adequacy regulation, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses, or another lawful transfer mechanism or exception applies. The Trust will assess the transfer and apply supplementary measures where required.

11. Security

The Trust applies role-based access, authentication, secure configuration, backup, audit, training, contractual controls and incident-management arrangements appropriate to the risk. Information received or sent in error must be reported immediately. No security measure can eliminate all risk, but the Trust is required to use measures appropriate to the likelihood and severity of harm.

12. Retention

College applicant and learner information is retained under the Trust's Records Management and Retention Schedules Policy and applicable funding, Individualised Learner Record, awarding-body, education, safeguarding, finance and limitation requirements. Different categories have different periods. The Department for Education determines its own retention for information it receives, including ILR and learning-record information.

Routine disposal may be suspended where information is subject to a safeguarding, audit, complaint, investigation, litigation or other preservation hold. At the end of the approved period, information is securely deleted, anonymised, transferred or preserved for archival purposes were lawful.

13. Information rights

Depending on the processing and lawful basis, individuals may have the right to be informed; obtain access and a copy; correct inaccurate information; complete incomplete information; request erasure; request restriction; object to processing; receive certain information in a portable format; and withdraw consent where consent is used. Rights are not absolute. The Trust will explain any lawful restriction or refusal and the right to complain.

A request can be made verbally or in writing. The Trust may ask for proportionate evidence of identity and authority. It will normally respond within one month, subject to lawful extensions. Information about another person may be withheld or redacted where their rights or another legal duty requires this.

14. Automated decision-making

The Trust does not routinely make decisions producing legal or similarly significant effects solely by automated means. If such processing is introduced, the Trust will identify a valid lawful basis, provide meaningful information about the logic and likely consequences, and implement safeguards including the ability to make representations, obtain human intervention and challenge the decision. Additional restrictions apply where special category information is involved.

15. Data protection complaints

A data protection complaint may be made to the Trust by email, telephone or post using the contact details in section 2. The Trust will make an accessible complaints route available, acknowledge the complaint within 30 days, take appropriate steps to investigate and respond without undue delay, keep the complainant informed and communicate the outcome.

A complaint may also be made to the Information Commissioner's Office through its website, on 0303 123 1113, or at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. The ICO would normally expect the concern to have been raised with the Trust first.

16. Changes to this notice

This notice is reviewed at least annually and whenever processing changes materially. Where a new use is not reasonably compatible with the original purpose, the Trust will identify a lawful basis and provide fresh privacy information before the new processing begins unless a lawful exception applies.

Schedule 1: Categories and sources of college learner information

Purpose	Information used and source	Lawful basis and additional condition
Identity and contact	Name, date of birth, addresses, contacts, photograph, identity, nationality and residency	Learner; parent or carer; previous setting; government services
Application and enrolment	Application, course choices, prior learning, eligibility, interview and enrolment records	Learner; previous settings; employers; agencies
Learning and achievement	Timetable, attendance, assessments, examinations, qualifications, feedback and destination	Trust staff and systems; awarding organisations; placements
Funding and learner records	ULN, ILR, fees, bursary, free-meal, apprenticeship and funding data	Learner; DfE; LRS; employer; funding bodies
Health, SEND and support	Health, disability, SEND, EHCP, learning support, access and adjustment information	Learner; parent or carer; previous setting; health and support professionals
Equality information	Ethnicity, religion, disability and other equality information were collected	Learner; previous setting; statutory returns
Safeguarding and welfare	Safeguarding, pastoral, behaviour, attendance, welfare, complaints and disciplinary records	Learner; staff; safeguarding partners; local authority; health bodies
Systems and security	CCTV, access, devices, online learning, accounts, network, filtering and monitoring records	Trust systems; approved suppliers; CCTV and access systems

Schedule 2: Purposes and lawful bases

Purpose	Information used and source	Lawful basis and additional condition
Applications and admissions	Application, identity, prior learning, eligibility and contacts	Articles 6(1)(b), (c) and (e).
Education, assessment and qualifications	Teaching, attendance, work, assessment, examinations and achievement	Articles 6(1)(c) and (e).

Purpose	Information used and source	Lawful basis and additional condition
ILR, ULN, funding and statutory returns	Identity, enrolment, course, achievement, residency, bursary and apprenticeship data	Articles 6(1)(c) and (e); Article 9(2)(g) where required.
Safeguarding and welfare	Safeguarding, attendance, health, pastoral and contact information	Articles 6(1)(c), (d) and (e); Articles 9(2)(b), (g), (h) or (i), with applicable DPA conditions.
SEND, disability and adjustments	Health, disability, EHCP, learning need and support	Articles 6(1)(c) and (e); Articles 9(2)(b), (g) and (h), as applicable.
Equality monitoring	Protected-characteristic information	Articles 6(1)(c) or (e); Article 9(2)(g) and applicable substantial-public-interest condition.
Security and acceptable use	CCTV, access, devices, networks, accounts and incidents	Articles 6(1)(c), (e) and, where appropriate, (f).
Optional publicity and non-essential marketing	Images, stories, events and optional communications	Article 6(1)(a) where consent is appropriate; electronic marketing also complies with PECR.

Schedule 3: Recipients and government use

Information may be shared with the Department for Education and its agencies; the Learning Records Service; awarding and examination organisations; funding bodies; apprenticeship employers and services; Student Loans Company or student-finance bodies where relevant; local authorities; destination settings; careers services; safeguarding partners; health and support services; placement providers; approved learning, ICT, payment and administration providers; professional advisers; regulators, courts and police.

The Trust submits learner information through the Individualised Learner Record and related statutory or funding routes. The Department for Education processes information about key stage 4, key stage 5, adult learners, higher education learners and apprentices for education, funding, attainment, attendance, apprenticeships, safeguarding, research and statistics. The Department and Learning Records Service publish separate privacy information and act as controllers for their own processing.