



**The Hurlingham Academy**

The best in everyone™

Part of United Learning

**DATA COLLECTION AND PROCESSING  
AND OUR PRIVACY COMMITMENT**

## **WHO IS AFFECTED BY DATA COLLECTION AND PROCESSING?**

We collect and process personal information about our students and their parents/carers. There are strict guidelines and laws surrounding the collection, storage and usage of this data and we are required to report some aspects of what we collect to the Department for Education (DfE), the Local Authority (London Borough of Hammersmith & Fulham LBHF), HMRC and others. This document sets out The Hurlingham Academy's commitment to handling this data responsibly and legally and seeks to address any questions you may have about what data we collect and why.

## **WHAT INFORMATION DO WE HOLD?**

### **Students**

We hold student information including contact details, national curriculum assessment results, attendance information, exclusion information, where they go after they leave us and personal characteristics such as ethnicity, nationality, religion, special educational needs and relevant medical information. We may receive information about students from, amongst others, their previous school or college, Local Authority, the DfE and the Learning Records Service. We hold this personal data to:

- support our students' learning
- monitor and report on their progress
- provide appropriate pastoral care; and
- assess the quality of our services

All students enrolling for post-14 qualifications are also required to be registered with The Learning Records Service. For more information about this, please see below. Certain information is also shared with the Joint Council for Qualifications and Examination Boards in order to administer and conduct examinations. Such data collected will not be used by an awarding body other than for the administration of the examinations process, conducting assessments and the certification of results claims. Please see the JCQ's Information for candidates – Privacy Notice which can be found [here](#)

A student, parent, carer or guardian can request access to their own data held by the Academy by contacting The SIMS Data Manager in writing or by email (see below).

### **Parents, Carers and Guardians**

In order for us to provide the best and most appropriate pastoral support for our students, we also collect data about their parents, carers or guardians. We only ask for information that is relevant to our role as pastoral carers, such as contact details and relevant medical history. We collect National Insurance Numbers or National Asylum Support Service Numbers of parents/carers/guardians to establish students' entitlement to additional funding, but we do not share this information with any organisation other than the Local Authority. A student, parent, carer or guardian can request access to their own data held by *The Hurlingham Academy* by contacting The SIMS Data Manager in writing or by email (see below).

## **WHERE DO WE SHARE INFORMATION?**

We are required by law to pass some information about students and their parents/carers to the Department for Education (DfE). This information will, in turn, then be made available for the use by our Local Authority (LBHF). If you need more information about how our Local Authority and/or DfE collect and use your information, please visit:

- LBHF: <https://www.lbhf.gov.uk/councillors-and-democracy/data-and-information/data-protection>
- DfE: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Once students reach the age of 13, the law requires us to pass on certain information about them to Hammersmith & Fulham Council, which has responsibilities in relation to the education and training of 13-19 year olds. We provide our Local Authority (LBHF) with students' names and addresses, dates of birth, name(s)/address(es) of their parent(s)/carer(s)/guardian(s) and any other relevant information.

We may also share certain personal data relating to children aged 16 and over with post-16 education and training providers in order to secure appropriate services for them. This may include the Local Authority (LBHF), independent careers advisors.

- National Careers Service: <https://nationalcareersservice.direct.gov.uk/Pages/Home.aspx>

#### **REQUESTING INFORMATION FROM THE HURLINGHAM ACADEMY**

Without exception, we do not share any identifiable or sensitive information about students, parents/carers, staff or governors with any third parties who are not legitimately entitled to receive such information.

#### **Subject Access Requests (SAR)**

An SAR is a request you can make about information held by an organisation about you or your child. You are entitled to be told what information is held, for what purposes and who that information has been shared with. You are entitled to be given a copy of all information held in an understandable format and, if there are terms you do not understand, to receive guidance as to their meaning. In some circumstances there may be a small administration charge applicable to such requests, but The Hurlingham Academy will endeavour to keep these to a minimum. For more information Subject Access Requests, please follow the link below.

- SAR: <https://ico.org.uk/for-the-public/personal-information/>

#### **Freedom of Information Requests (FOI)**

An FOI Request is different to a Subject Access Request. FOI Requests cannot be about an individual and should not request information that could be used to identify an individual. We do not respond to Freedom of Information Requests which specifically request information about individuals or seek information which could be used to identify individuals (such as individual medical information, ethnicity, religion, criminal record, sexuality, political opinion and union membership). Please visit United Learning's [website](#) for more information about Freedom of Information Requests

#### **CONTACTS AND FURTHER INFORMATION**

The Hurlingham Academy  
Peterborough Road  
London  
SW6 3ED

- The SIMS Data Manager (Mike Jessel): [mjessel@thehurlinghamacademy.org.uk](mailto:mjessel@thehurlinghamacademy.org.uk)
- Data Protection Officer (Ian Ilett): [iilett@thehurlinghamacademy.org.uk](mailto:iilett@thehurlinghamacademy.org.uk)

LBHF  
Information Manager  
Smart Space  
3rd Floor Hammersmith Town Hall  
London W6 9JU  
Data protection team: [FOIRequests@lbhf.gov.uk](mailto:FOIRequests@lbhf.gov.uk)

## THE LEARNING RECORDS SERVICE (LRS)

This statement is intended to provide you with information as to how LRS will collect and use your personal information and data, and how you can exercise choice in respect of the use of your personal data.

The LRS collects data relating to learners registering for relevant post-14 qualifications, for example GCSEs, AS and A2 Qualifications, Diplomas, Entry to Employment Certificates and Qualifications Credit Frameworks (QCFW) and associated units.

The LRS offers a facility which stores learner participation and achievements collected directly from awarding organisations known as the Personal Learning Record (PLR). Permitted organisations will have access to your PLR to access your achievements, awards and credits and to offer advice and guidance. In order to see your own PLR please go to the following website and click on "Access my personal learning record":

<https://www.gov.uk/government/publications/learning-records-service-the-plr-for-learners-and-parents>

The LRS core service offers:

- Unique Learner Number (ULN) to individual learners.
- On-line PLR.
- Additional functionality to support the QCFW providers will include:
  - A Routes to Achievement function which enables permitted organisations to view potential future pathways for a learner's education.
  - A Single Qualification Query to understand which units learners need in order to accumulate the relevant credit for a particular qualification.
  - The facility to support Credit Transfer which enables credit to be transferred between 2 qualifications from 2 different Awarding Organisations.

### COLLECTION OF DATA

The LRS collects data from:

- Other department agencies, schools and training/learning providers.
- Information provide by you when enrolling with the training/learning provider.
- Qualification, unit and Rules of Combination data from Ofqual.
- Participation and achievement data held by the Welsh Assembly Government.
- Learner achievement data supplied by awarding organisations directly into the PLR.

### USE OF DATA

The ULN will enable education and training sector organisations and Awarding Organisations regulated by Ofqual in England, DCELLS in Wales and Northern Ireland, to share information about participation and achievement in a consistent and approved manner, promoting good information management practice, and helping to improve accuracy and efficiency.

This will benefit you through enhancing the application processes to Awarding Organisations, learning providers, learning advisors and other third parties.

The PLR will be shared with organisations linked to your education and training, including those organisations specified in Regulations made under section 537A of the Education Act.

Awarding organisations will have very limited access to your achievement data in order to support you in their decision making regarding qualifications and to support the learner in claiming and transferring prior credit.

All organisations that have access to the information you provide are registered under the Data Protection

Act 1998 and will use your personal information in accordance with the requirements of the Act. These organisations are required to sign relevant agreements and control documentation which requires them to manage your data responsibly and only to access information where there is a direct connection between you and the relevant organisation.

At no time will your personal information be passed to any organisations for marketing or sales purposes.

#### **PERMISSIONS FOR SHARING**

The ULN is required to fulfil statutory requirements for administrations of services within the education and training sector, you cannot opt out of being issued with a ULN by the LRS.

You can opt-out of sharing your PLR. For details of how you may opt out of sharing your participation and achievement data, refer to PLR: Useful Information for Learners and Parents on the following website:

- LRS: <https://www.gov.uk/government/publications/learning-records-service-the-plr-for-learners-and-parents>

A consequence of deciding not to allow data sharing of your participation and achievement data contained in the PLR will be that you may need to provide copies of certificates or other information to verify qualifications. You will also inhibit organisations that can support your continued education working with you, to perform on your behalf including the learner centric functions of the QCFW: Routes to Achievement, Rules of Combination queries and Credit Transfer functions.

#### **REPORTING INACCURACIES ON THE PLR**

A major benefit of the LRS is that you can check that information held about you is accurate and request that any inaccurate data is corrected. For more information about how to report a problem on your PLR please see PLR: Useful Information for Learners and Parents on the following website:

- LRS: <https://www.gov.uk/government/publications/learning-records-service-the-plr-for-learners-and-parents>

Awarding Organisation are responsible for maintaining the currency and accuracy of any achievement data they upload into your PLR.

#### **SENSITIVE PERSONAL DATA**

The LRS makes every effort not to collect any information which consists of sensitive personal data (e.g. data which relates to ethnic origin, physical or mental health, religious beliefs, trade union membership or any criminal offences or proceedings).

If you find that any sensitive personal data has inadvertently been included, you should contact the Agency through the service desk. The LRS currently employs a process of sensitive personal data identification and removal.

#### **SENSITIVE LEARNERS**

The LRS recognises that some learners have specific concerns about privacy which mean that additional safeguards are required. The LRS implements a Sensitive Learners Policy to ensure these safeguards are implemented.

#### **SECURITY**

The LRS recognises the need to keep your information secure and has implemented a Security Policy that provides the appropriate technical and organisational measures aimed at preventing loss of, or unauthorised use of, your information in accordance with Government standards.

#### **HOW LONG WILL WE KEEP YOUR DATA?**

The LRS is intended to provide a life-long record of learning which will be available to you at any time you choose to participate in education or training. Therefore, the LRS may continue to hold your ULN, PLR and QCFW and associated data for 66 years and will be reviewed periodically.

## **UPDATES TO THIS POLICY**

The LRS recognises that privacy and data protection concerns can evolve over time and will keep this policy under review. Any amendments will be posted here and will be notified to learners when they access their PLR.

## **SUMMARY**

- The information you supply will be used by the Skills Funding Agency, an Executive Agency of the Department for Business, Innovation and Skills, to issue you with a Unique Learner Number (ULN) and your own on-line PLR.
- Your PLR will include information about your qualifications, awards, training events and learning achievements that you may collect throughout your education lifetime – at all levels and also whilst you are working and learning.
- Your PLR can be shared with organisations who have a responsibility for providing, funding and serving your education and training.
- Your ULN is a ten digit reference number, unique to yourself for use within education. Please keep this number in a safe place.
- If you have still not reached the age of 16, you might first wish to discuss this privacy notice explanation with your parent or legal guardian.
- The Skills Funding Agency funds some of the qualifications and training that you may be receiving through your college, training or learning provider.
- Your PLR record will help you to share your achievements, including any participation of learning, the training institute details and over what period. Please note that you will always be in control of who accesses your PLR.
- Your ULN will also be used to collect and share information amongst education related organisations, careers advisors, and college registration and course enrolment staff.