



Privacy Notice for Service Users at St Elizabeth's Centre and their Families

This notice is addressed to all those who use the services provided by St Elizabeth's Centre, and to their families, where we are controllers or processors of their data.

St Elizabeth's Centre is the charity that runs our School, College, Day Opportunities, Children's Home and Supported Living, both on site at St Elizabeth's Centre and off-site.

This notice explains how St Elizabeth's Centre ('we' 'us' 'the Charity') uses your personal data. Personal data means information about you or which relates to you in some way.

Our Contact details

St Elizabeth's Centre
Perry Green
Much Hadham
Hertfordshire
SG10 6EW
Tel: 01279 843451

St Elizabeth's Centre is the Controller for the purposes of data protection law.

The Data Protection Officer for St Elizabeth's Centre is Mike Bibby (dpo@stelizabeths.org.uk / 01279 844205).

The Type of Personal Information we may collect about you

- personal identifiers and contacts (such as name, date of birth, unique pupil number, contact details and address)
- characteristics (such as free school meal eligibility, ethnicity, language, nationality, country of birth, religion, gender identity, sexual orientation)
- safeguarding information (such as court orders and professional involvement)
- special educational needs
- medical information (such as NHS number, mental capacity assessments, seizures and interventions, doctors' information, diagnosis of conditions, general health, dental health, allergies, medication and dietary requirements, personal care, therapy requirements, therapy support plans)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended), including any exclusions
- assessment and attainment (how well you are doing at school or college)
- information about your behaviour, including any previous safeguarding concerns
- risk assessments
- deprivation of Liberty paperwork, if relevant.
- financial information about your benefit entitlements

- funding arrangements for your placement
- admissions records
- emergency contacts, and next of kin
- social activities
- personal care details
- who your keyworkers are
- photographs or video footage

We also collect personal information about the parents or guardians, or other relatives, of our service users (such as name, contact details, relationship to service user).

Why we collect and use information about you

We collect and use information about you for the following purposes:

- a) to support student learning
- b) to monitor and report on attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep learners, residents and children safe (food allergies, or emergency contact details)
- f) to check for entitlement to free school meals
- g) to check for Early Years pupil entitlement and claim for pupil premium
- h) to comply with legal requirements
- i) to meet standards of good practice including Ofsted and CQC requirements, and the standards in PAMMS (Provider Assessment and Market Management Solution used by local authorities to assess care providers)
- j) to support residents with everyday living.

Legal Basis

Under the General Data Protection Regulation (GDPR), article 6, the lawful bases we rely on for processing this information are:

Legal obligation

We use this when we have to use your personal data to comply with a legal obligation. For example, we are required by law to collect some information about those who use our services or their parents and carers, and we may need to use information about those who join us to complete mental capacity assessments under the Mental Capacity Act 2005.

We collect and use pupil information under:

- The Education Acts (various years)
- The Education (Pupil Registration) (England) Regulations
- The School Standards and Framework Act 1998
- The School Admissions Regulations 2012
- Children and Families Act 2014
- The Special Educational Needs and Disability Regulations 2014.

Legitimate Interests

This is used when we have established that we have a legitimate interest in using your personal data and we have balanced our interest against your interests. We use this for some photographs and videos (see photograph policy for further details).

Consent

This is used when we ask you or your parent, guardian or other appointed person for consent.

Public interest

We use this when we are using your personal data to provide disability support or help keep you safe.

We may collect some information about you that is special category data. This covers the information we have about your health. This information is sensitive so we must have another legal basis for using it under article 9 of the GDPR. We use substantial public interest for this. The substantial public interest is:

1. support for individuals with a particular disability or medical condition
2. safeguarding of children and of individuals at risk.

Collecting information

We collect information about you from you, or your parents or guardians, before you join us. We may also get some information about you from your last school or college, from the local authority or from health professionals involved in your care. Once you are at St Elizabeth's we may record other information about you because you are accessing our services so that we can look after you, help you to learn and record your progress, or support you with everyday living.

Most of the information we ask for is necessary, and often we are required by law to collect it. You may not be able to join us if it is not provided. If there is a choice about whether to give us information or not, then we will tell you that it is optional.

Storing your personal data

We hold your data securely for the set amount of time shown in our Records Retention Policy, which gives more information about how long we keep information about you.

How we store your personal data

Your information is stored securely on both local servers and cloud-based systems. All access is restricted to authorised users with username and password authentication.

Who we share data with

We routinely share data with:

- Local authorities

- Schools, colleges and adult provisions which you may attend after leaving us
- Youth support services (pupils aged 13+)
- The Department for Education (DfE)
- Ofsted
- City & Guilds
- School nursing services (NHS)
- Physiotherapists
- Speech therapists
- Education psychology services
- Education welfare service
- Occupational Therapists
- Curriculum Enrichment Activities
- Schools our pupils attend for inclusion
- ICB (Integrated Care Board)

Why we regularly share data

We do not share information about our service users or their families with anyone without consent, unless the law and our policies allow us to do so.

Local Authorities

If you have an Education Health and Care Plan (EHCP), we will share information about this with the local authority because the Local Authority is responsible for maintaining the EHCP.

If you have a Health and Care Plan with the Local Authority or ICB, we will share information about this with the organisation commissioning your placement because they are responsible for maintaining the Plan.

Data is securely transferred to the Local Authority or ICB via password protected email.

We also share data on safeguarding issues.

Youth support services

Pupils aged 13+:

Once our pupils reach the age of 13, we also pass pupil data to our local authority and / or provider of youth support services (Services for Young People) as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide these services:

- youth support services
- post-16 education and training
- careers advisers

A parent or guardian can object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us. This right is transferred to the learner once they reach the age of 16 but in practice will continue to be exercised by the parent, guardian or other appointed person where the learner does not have the capacity to make an objection for themselves.

Data is securely transferred to the youth support service via Egress and password protected in word if requested by a social worker.

Department for Education

Under the Education (Information about Individual Pupils) (England) Regulations 2013, we may be required to provide information about you to the Secretary of State for Education which in practice means the Department for Education. The data we share with the Department for Education underpins school funding and educational attainment policy and monitoring.

There is also a regular school census which requires us to provide information about our school pupils to the Secretary of State for Education which in practice means the Department for Education. This is under section 537A of the Education Act 1996. Further information can be found on their website: <https://www.gov.uk/education/data-collection-andcensuses-for-schools>.

The college is routinely required to provide learner data to the Department for Education (or the ESFA which is part of the Department for Education). This will mostly be through the Individual Learner Record (ILR). This data calculates the ESFA funding allocation. You can find out more about this here: <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>.

Ofsted

The school, college and Children's Home are all regulated by Ofsted and during the course of an inspection, Ofsted may view information relating to pupils and learners. [The Education Act 2005](#) gives Ofsted inspectors the power to inspect and take copies of any records that are relevant.

City and Guilds

As an awarding organisation, City & Guilds require details of individuals who are undertaking accreditation, to enable them to engage with the curriculum. The data is managed through a secure website.

Curriculum Enrichment Activities.

We provide limited personal data to certain of our external activity providers, including:

- Church Farm - learners' names only;
- RDA – risk assessments and emergency medical protocol plans;
- Hydrotherapy and swimming - risk assessments and emergency medical protocol plans.

We may also provide personal data to organisations offering work experience opportunities to our learners.

Use of Processors

We use processors to process some information on our behalf. Processors have a contract with us and must follow our instructions and keep your information secure.

We are engaged with the following third parties (these relationships are governed by data processing agreements/terms):

- Earwig – software to help record student progress in school

- Navigate – software to help record learner progress in college
- Docuware - off-site archiving (record storage and scanning) provider
- Omnicell – Medication management software
- Clearcare – care planning, daily records, risk assessment software (children's home)
- Person Centred Software (PCS) – Care planning, daily records, risk assessment (Supported Living)
- Nooa – communication app for service users, families and staff
- CPOMS – incident recording software
- Arbor – management information system.

Your data protection rights

You have the following rights in relation to your personal information:

Right of access

You have the right to ask for a copy of the personal information which we have about you. You can find out more here: <https://ico.org.uk/your-data-matters/your-right-of-access/>. To make a request for your or your child's personal information, or to be given access to your child's educational record, please contact dpo@stelizabeths.org.uk.

Right of rectification

You have the right to rectification. This means that you can ask us to correct the personal information we have about you. You can find out more here: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected/>

Right of Erasure

You have the right to erasure, also often referred to as the 'right to be forgotten'. This is the right to have your personal information deleted. You can find out more here: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>

Right to object to processing

You have the right to object to what we do with your personal information. You can find out more here: <https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/>

Right to portability

This right only applies if we are using your personal data and the legal basis for us doing so is either consent or performance of a contract with you as an individual. This means that most of the time it will not be relevant. In certain circumstances, it means that you can ask us to transfer your personal data to another organisation. This only applies where you have provided the personal data to us and we hold it electronically. You can find out more here: <https://ico.org.uk/your-data-matters/your-right-to-data-portability/>

Right to withdraw your consent

We do not normally use your personal data on the basis of consent but where we do you may withdraw your consent. In cases where your right to withdraw consent is not relevant, you could use your right to object instead.

You can find out more here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/consent/how-should-we-obtain-record-and-manage-consent/#how6>

To use any of your rights, please contact us by emailing dpo@stelizabeths.org.uk, telephoning 01279 844205, or speaking to Mike Bibby.

We will normally be under an obligation to respond to you within one month, although we are sometimes permitted to extend the deadline.

Transfers of Personal data

We do not routinely transfer personal data overseas but when this is necessary we ensure that we have appropriate safeguards in place.

How to complain

If at any time you have a complaint about what we do with your personal data, then you can complain to us by contacting the Data Protection Compliance Officer for St Elizabeth's Centre:

Mike Bibby (dpo@stelizabeths.org.uk / 01279 844205)

or you can complain directly to the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Approved by the Board of Trustees 11 March 2025