SGS Academy Trust

Privacy Statement

South Gloucestershire and Stroud College sponsors the SGS Academy Trust. Therefore, both the SGS Academy Trust and your school (SGS Forest High School, SGS Berkeley Green UTC or SGS Pegasus) are joint Data Controllers for the personal data collected and held by your school.

The Data Controllers collect and process personal data about prospective, current and former pupils, their parents and other people connected to or visiting the school. If you are under the age of 16, you should always speak with an appropriate adult before sharing any of your personal data.

There are child friendly versions of this notice available on the Trust website:

Privacy Statement | The SGS Academy Trust

What is the purpose of this document:

The SGS Academy Trust ("we", "our", "us") is committed to protecting the privacy and security of your personal information ("personal data"). This Privacy Notice describes how we collect and use personal information about you in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (the "GDPR"), together with other UK data protection laws.

Our Data Protection Policy, as well as more information on how we process personal data, can be found at: Trust Policies and Procedures | The SGS Academy Trust

Our Data Protection Officer can be contacted at info@sgsat.org.uk if you have any questions regarding this document.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using your personal data and what your legal rights are in relation to it.

What kind of information does the SGS Academy Trust hold about me?	SGS Academy Trust takes your privacy very seriously. We only collect information about you so that we can support your studies, assist your progress and progression, and keep you safe.
How does the SGS Academy Trust collect my personal information?	We usually collect personal data about you from the information that you and your parents, carers and guardians provide to us during the enquiries, application and enrolment process, or through a third party such as the local authority or from your previous school or college.
How does the SGS Academy Trust use the data and information that it collects about me?	Generally, we collect and use your information to deliver our services to you and your parents, carers or guardians. We regularly collect and use information about you to: ▪ to support your learning ▪ to monitor and report on your attainment and progress ▪ to provide you with appropriate pastoral care ▪ to assess the quality of our services ▪ to you and other young people safe ▪ to meet the statutory duties placed upon us by the Department for Education (DfE) for data collections
How might the SGS Academy Trust share my personal data?	SGS Academy Trust will share your personal data with your parents, carers and guardians. We'll also share your personal information with third parties when we are required to do so by law or where it is necessary for us to provide education services to you.
What information with the SGS Academy Trust share with parents, carers and guardians?	SGS Academy Trust will share your personal data with your parents, carers and guardians. We'll share information about your education generally and about your attendance, progress (including any disciplinary matters) and information about your attainment and achievement.
How long does the SGS Academy Trust keep information and data about me?	SGS Academy Trust will retain your personal information for as long as necessary to fulfil the purposes for which we collected it and we keep records of all our data processing activity.
What rights do I have in connection with how the SGS Academy Trust collects uses my data?	Everyone has specific rights when it comes to their personal data and how it is used. For example, you have the right to ask to see what information we hold about you and to ask us to correct any personal data that inaccurate.

What kind of information does the SGS Academy Trust hold about me?	SGS Academy Trust takes your privacy very seriously. We only collect information about you so that we can support your studies, assist your progress and progression, and to keep you safe.

The kind of information we hold about you:

Personal data, or personal information (we use these terms interchangeably) means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Some of the personal data we collect about you is classed as being 'special category personal data (*)', for example information relating to your ethnicity or any disability. Access to and the sharing of this type of information is controlled very carefully.

The type of personal information that we collect, store, and use about you may include:

Categories of personal information	Enquirers	Applicants	Pupils (Including former pupils)	Parents, Carers & Guardians
Academic records		✓	✓	
Biometric information	×	×	×	×
Children looked after (CLA) and Children in need status		✓	✓	
Complaint information	✓	✓	✓	✓
Correspondence (with and concerning pupils and parents past and present)	✓	✓	✓	✓
Criminal offence data*		✓	✓	
Data captured by CCTV systems	✓	✓	✓	✓
Date of birth			✓	
Disciplinary records			✓	
Education history and qualifications	✓	✓	✓	
Education, health and care plan information (EHCP), My Plan, My Plan+*			✓	
Employment status, history, and related information			✓	
Episodes of being a child in need			✓	
Examination scripts and marks		✓	✓	
Free school meal eligibility		✓	✓	
Financial support information			✓	
Gender			✓	
Health information, medical conditions or injuries, and learning difficulty and disability status*			✓	
Household situation			✓	
Initial Child Protection information and Child Protection Plan		✓	✓	
Information about certain criminal convictions, for example, where a parent volunteer requires a check with the Disclosure and Barring Service (DBS)				✓

Interests (and extra-curricular activity)			✓	
Invoicing details			✓	
IP addresses and cookies	✓	✓	✓	✓
Nationality		✓	✓	
National Insurance number		✓	✓	
Next of kin/emergency/parent/guardian contact information			✓	
Personal information and contact details		✓	✓	
Photo identification		✓	✓	
Photographs/videos for business purposes			✓	
Photographs/videos for marketing purposes	✓	✓	✓	✓
Religion, nationality, or ethnicity*			✓	
Residency status, right to work and immigration information			✓	
References		✓	✓	
Sexual orientation*	×	×	×	×

We may also collect other additional personal information during the course of our relationship with you. If we collect additional information about you we will tell you if we're legally allowed to and if doing so does not require disproportionate effort.

How does the SGS Academy Trust collect my personal information?

How we collect your personal information:

We usually collect personal information about pupils through the information they (and their parents) provide to us during the enquiries, application and enrolment process, or through a third party such as the local authority or a previous school or college.

We also collect personal information about parents and guardians, where relevant. We collect this information either from the pupil or directly from their parents, carers or guardians.

Should we collect personal information from a third party (someone other than the person to whom the information relates) we will only use that information for the purposes it was collected. Should the Data Controller intend to further process that personal information for a purpose other than that for which it was collected, we shall let the person to whom that information relates, know in advance of the further processing.

How does the SGS Academy Trust use the data and information that it collects about me?

Generally, we collect and use pupil information to deliver our services to pupils and their parents, carer or guardians, and we have set out the main purposes for processing below. We regularly collect and use information about pupils to:

- to support their learning
- to monitor and report on attainment and progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children and young people safe
- to meet the statutory duties placed upon us by the Department for Education (DfE) for data collections

How we use the data and information that we collect:

Data protection laws require us to meet certain conditions before we are allowed to use personal data in the manner described in this Privacy Notice, including having a 'lawful basis' for the processing. Where we process special category personal data or criminal offence data, we are required to establish an additional lawful basis for processing that data.

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.

Purpose	**Lawful Basis**
To assess your suitability to join an SGS Academy Trust School and to enable your participation in our education programmes. To deliver and administer your education programme, and related services.	▪ To comply with our legal obligations ▪ Performance of a task in the public interest (education) ▪ Necessary for the performance of a contract
To contact parents, carers, guardians (or advocates) in relation to a pupil's participation on our education programmes. To contact parents, careers or guardians in an emergency.	▪ To comply with our legal obligations ▪ Performance of a task in the public interest (education) ▪ Necessary for the performance of a contract ▪ Where it is needed to protect a person's vital interests and they are not capable of giving consent (e.g. in an emergency) ▪ With your consent (where applicable)
To administer, or otherwise deliver,	▪ Necessary for the performance of a contract

our obligations arising from your studies. To provide personal support, including welfare and safeguarding support.	▪ To comply with our legal obligations, e.g. in respect health and safety law or equality law ▪ Performance of a task in the public interest (education) ▪ Legitimate interests (where applicable) ▪ Where it is needed to protect a person's ▪ vital interests and you are not capable of giving your consent (e.g. in an emergency) ▪ With your consent (where applicable)
Equal opportunities monitoring.	▪ To comply with our legal obligations
Internal and statutory reporting, audit, and other legal obligations, including compliance with health and safety law and monitoring equality of opportunity or treatment.	▪ To comply with our legal obligations, e.g. employment and health and safety law ▪ Performance of a task in the public interest (education)
Direct marketing Photography for promotional or advertisement purposes	▪ With your consent
Research and planning purposes.	▪ Performance of a task in the public interest ▪ Where it is in our/your legitimate interests

Do we need your consent?

We do not generally process personal data based on consent (as we can usually rely on another legal basis, as outlined in the table above). If we do process personal information based on consent, we will inform you of this before we start that processing and you will have the right to withdraw your consent at any time.

What if you fail to provide personal information:

If you fail to provide certain information when requested, we may not be able to provide you with access to our programmes, or we may be prevented from complying with our legal obligations (such as equal opportunities monitoring).

Change of purpose:

We will only use your personal information for the purposes for which we 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 we will explain the legal basis which allows us to do so.

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.

Automated decision-making:

Automated decision-making takes place when an electronic system uses personal information to decide without human intervention. We do not make any decisions by automated means; however, we will notify you in writing if this position changes.

How might the SGS Academy Trust share my personal data?

SGS Academy Trust will share personal data with third parties when we are required to do so by law or where it is necessary for us to provide education services to you.

How we may share your personal data:

We may share your personal data with third parties that are essential to complying with our legal and contractual obligations. For example, we will share personal information with awarding organisations, other schools, colleges and universities, employers, and third-party technology providers. A full register of who we may share your personal data with and why is available on request.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the data collection requirements placed on us by the Department for Education, you can visit: https://www.gov.uk/education/data-collection-and-censuses-for-schools

The National Pupil Database (NPD):

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected form a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, you can visit: https://www.gov.uk/guidance/apply-for-department-for-education-dfe-personal-data

The Department for Education may share information it collects through the NPD with third parties who promote the education or well-being of children in England.

To find out more about the department's data sharing process, you can visit: How DfE shares personal data - GOV.UK (www.gov.uk)

Youth support services – for pupils aged 13+

Once pupils reach the age of 13, we also pass their personal information to our local authority and / or a provider of youth support services, 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 services as follows:

- youth support services
- careers advisers

The information shared is limited to the child's name, address and date of birth. However, where a parent, carer or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This is a right which is transferred to the pupil once they reach the age 16.

Pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority and / or a provider of youth support services to enable them to provide services such as:

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

For more information about services for young people, please visit our local authority website.

Before the SGS Academy Trust (or your School) shares any personal data, we take appropriate security measures to protect that information, in line with our policies. We do not allow our third-party partners or service providers to use your personal data for their own purposes and we will only permit them to process your personal data for specified purposes and in accordance with our instructions.

The SGS Academy Trust does not transfer personal data outside of the UK.

However, your data may be transferred outside of the UK, for example, where we use third party providers to deliver our services, such as externally hosted software or cloud providers who store data globally. We undertake strict due diligence on all partners to ensure that they have the adequate safeguards in place to protect your data under Article 46 GDPR.

Cookies and Other Tracking Technologies:

We may use cookies or other technologies to help provide an effective online presence, offer you a more personalised user experience, or market products and services to you.

We also use Social Media such as Twitter, Facebook and LinkedIn. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on SGS Academy Trust sites. You should check the respective policies of each of these sites to see exactly how they use your information and to find out how to opt out, or delete, such information.

How we keep your data secure:

We have measures in place to help protect the security of your information. Where the infrastructure is in our direct control, we have put in place appropriate security measures to help prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

What information will SGS Academy Trust share with parents, carers and

SGS Academy Trust will share with parents, carers and guardians, personal data about their child's education, attendance, progress (including any disciplinary matters) and information about their attainment and achievement.

Parents, carers and guardians

SGS Academy Trust and our constituent schools will share pupil information with parents, carers and guardians in relation to their child's participation in and progress on our education programmes.

We know that it is beneficial to each young person's progress if their school is able to engage with their parents, carers and guardians. Therefore, it is very important that we have up-to-date contact details recorded on our systems.

According to UK GDPR and the Data Protection Act 2018, young people aged 16 and over can decide for themselves and give consent for the processing of their personal information and parental consent is not always required. There may be exceptions in regards of pupils with severe learning difficulties, and those who are otherwise unable to decide for themselves.

Children in need and looked after children information

We are required to share information about our children in need and children looked after, with both our Local Authority and the Department for Education (DfE).

We share children in need and children looked after data with the Department for Education (DfE) on a statutory basis, under Section 83 of 1989 Children's Act, Section 7 of the Young People's Act 2008 and also under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data about children in need and children looked after is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current government security policy framework.

How long does the SGS Academy Trust keep information and data about me?

SGS Academy Trust will retain personal information for as long as necessary to fulfil the purposes for which we collected it and we keep records of all our data processing activity.

Data retention:

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it. Details of retention periods for different aspects of your personal information are available in our Data Privacy and Protection Policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once we no longer require access to your personal information we will retain and securely destroy it in accordance with our Data Privacy and Protection Policy and applicable laws and regulations.

What rights do I have in connection with how the SGS Academy Trust collects uses my data?

Everyone has specific rights when it comes to their personal data and how it is used. For example, you have the right to ask to see what information we hold about you and to ask us to correct any personal data that inaccurate.

Your individual rights in connection with personal data:

Subject to certain conditions, you have the following rights in relation to your personal data:

- **Request access to your personal information** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

  Please note: The Data Controllers are not required to disclose any pupil test scripts or provide test marks ahead of any ordinary publication, nor share any confidential reference given by the academy itself for the purposes of the education, training or employment of any individual.

- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure of your personal information** where there is no good reason for us continuing to process it.

- **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground (Including when we are using it for direct marketing purposes).

- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Suspend processing of your personal information**, for example if you want us to establish the accuracy of the data we are processing.

- **Request the transfer of your personal information to another party.** You can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your

information is consent (please see 'Our legal bases for using your information' above); and (c) the information is being processed by us on computer.

Please note: Where images and videos have been used on our website or in social media, to promote the SGS Academy Trust and our Schools, appropriate consent has been sought from parents, carers or guardians for their use. Should parents, carers, guardians or pupils wish to withdraw consent for any future use of those images or videos, then please get in touch by using the contact form on our website (below).

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Your duty to inform us of changes:

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

If you wish to discuss any of the above rights or tell us about a change to your data, please contact your Headteacher:

Marie Cooper Acting Headteacher SGS Pegasus	**Gareth Lister** Headteacher SGS Berkeley Green UTC	**Nicola Mooney** Headteacher Forest High School
SGS Pegasus School, Hempton Lane, South Gloucestershire, BS32 4AJ T: 01454 568 200	SGS Berkeley Green UTC, Gloucestershire Science and Technology Park, Berkeley, GL13 9FB T: 0800 470 1516	SGS Forest High School, Causeway Road, Cinderford, Gloucestershire, GL14 2AZ T: 01594 822257
https://academytrust.sgscol.ac.uk/sgs-pegasus-school/contact	https://academytrust.sgscol.ac.uk/sgs-berkeley-green-utc/contact	https://academytrust.sgscol.ac.uk/the-forest-high-school/contact

Alternatively, you can email us at: info@sgsat.org.uk

Further guidance on your rights is available from the Information Commissioner's Office at: https://ico.org.uk/for-the-public/

This notice

We have designed this privacy notice to be as transparent, useful and informative as possible and we would love to hear any feedback on how we can make it even better. Please contact us at DataPrivacy@sgscol.ac,uk, and please don't let this be the last

time you read this notice. We may make changes to it from time to time any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

This version was last updated in June 2025

What should I do if I'm unhappy with how the SGS Academy Trust has handled my data?

If you are unhappy with how we have handled your data:

Then please get in touch with our Data Protection Officer, who is responsible for ensuring that the SGS Academy Trust complies with all the requirements of UK GDPR.

You can email our Data Protection Officer at: info@sgsat.org.uk

Or you can contact us by post, or via the telephone at:

Data Protection Officer
SchoolPro, Commercial House, 2 Abbeymead Ave, Upton St Leonards, Gloucester GL4 5UA

If however, you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

This can be done through live chat on the ICO website, or via the telephone at:

https://ico.org.uk/global/contact-us/contact-us-public/public-advice/

0303 123 1113

More information on the ICO's complaint procedure can be accessed at:
https://ico.org.uk/for-the-public/how-to-make-a-data-protection-complaint/