

**FRESH FUTURES**

**BRIAN JACKSON COLLEGE**

New document version	Revision date	Revised by	Section(s) revised & why	Comments	Next revision date
1.0	2021			New pro forma	
1.1	2024	Bruce & Butler	All sections	Branding update	February 2025

### **Brian Jackson College Privacy Policy**

At Brian Jackson College we are committed to protecting the privacy and security of our service users and site visitors. Brian Jackson College fully understand the importance of keeping your data secure and private.

Brian Jackson College is part of Fresh Futures.

This privacy notice therefore aims to be completely transparent about how we handle and use your personal data at Brian Jackson College . Our Privacy Policy has been written to help you to understand how and why your personal information is collected at Brian Jackson College and what rights you have available to that information.

For further information, please contact our Data Protection Officer using the contact details found in **Section 2** of this Policy.

#### **1. Who we are and how you can contact us:**

“Brian Jackson College” (referred to in this policy as “BJC”, “we”, “us” or “our”) is a trading name of:

**Fresh Futures (National Children’s Centre)**

Brian Jackson House  
New North Parade  
Huddersfield  
HD1 5JP

Registered Charity Number: 288125

Company number: 1763241  
ICO Registration Number: Z5459259

## 2. Our Data Protection Officer:

We have appointed a Data Protection Officer, who can be contacted in the following ways should you have any questions, complaints or feedback about your privacy:

**Mail:** **Data Protection Officer**  
FAO Shaista Ahmed and Bruce & Butler Limited  
Fresh Futures  
Brian Jackson House  
New North Parade  
Huddersfield  
HD1 5JP

**Email:** dpo@freshfutures.org.uk

**Tel:** 01484 519988

## 3. Where we collect your personal data:

We collect your personal data in the following ways:

### Data that is given to us:

- When you complete an induction form prior to attending BJC; and
- When you complete a health survey;

### Data we are provided with when you join Brian Jackson College:

- Referral forms provided prior to attending BJC;
- Support plans;
- Educational Health Care Plans;
- SIMs data including attendance, exclusions, behaviour, attitude to learning and incidents;
- Support worker details; and
- Police Incident Reports.

### Data we collect whilst you are a student of Brian Jackson College:

- Attendance information;
- Behavioural information;
- Career Pathway;
- CCTV footage captured;
- Photos and videos taken for marketing purposes; and
- Integris data, including attendance, exclusions, behaviour, attitude to learning and incidents.

### Data we are provided

Where applicable, Brian Jackson College will collect information relating to yourself from a variety of organisations for current and potential service users. These include but are not limited to:

- The Police;
- NHS;
- Local Authorities; and
- Other relevant agencies (for instance Social Services and the Courts);

#### 4. Data we collect about you:

We will collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Categories of personal information	Description
<b>Identity Data</b>	Title, first name, middle names, last name, nickname, date of birth, signature, image, gender, Unique Pupil Number (UPN), health information, religious and philosophical beliefs, sex life, language(s) spoken.
<b>Contact details</b>	Telephone number(s), email address(es), postal address(es), work address(es).
<b>Parents/Guardians Data</b>	Title, first name, middle names, last name, telephone number(s), email address(es), postal address(es), work address(es), relationship to student.
<b>Emergency Contact data</b>	Title, first name, middle names, last name, nickname, relationship to student, current address, telephone number(s).
<b>Student School data</b>	Attainment, attendance, behaviour, special learning requirements, safeguarding, qualifications.
<b>Criminal Offence data</b>	Information relating to criminal convictions and offences.
<b>Image data</b>	Visual footage collected via CCTV
<b>Technical data</b>	Cookies, IP Address
<b>Message details</b>	Information disclosed through communications or notes.

We collect special categories of personal data about you, and these will be processed under our requirement for the management of health or social care systems. This

includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation and information about your health.

We also collect information relating to criminal convictions that are currently being served or are outstanding and we have official authority to do this.

## 5. How we use your personal data:

We are only allowed to use personal data about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below: the personal data which we collect from you, how we use it, and the legal ground on which we rely when we use the personal data.

To maximise the protection of your identity, for certain processing activities, BJC will pseudonymise your personal information. Pseudonymisation is a technique to remove information that directly identifies an individual and replaces it with a reference point i.e., replacing a student's name with an identification number.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below. We will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

What we use your personal information for	What personal information we collect	Our legal grounds for processing	Our legitimate interests (if applicable)
CCTV footage	<ul style="list-style-type: none"> <li>Image data</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interests</li> </ul>	<p>To ensure the safety and security of students, employees, visitors and company assets.</p> <p>For the prevention and detection of crime.</p>
Photos and videos taken during activities	<ul style="list-style-type: none"> <li>Image data</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interests</li> <li>Consent</li> </ul>	To use as marketing materials on the BJC website, magazines and articles.
Completion of induction forms	<ul style="list-style-type: none"> <li>Identity data</li> <li>Contact data</li> <li>Parents/Guardians data</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract</li> </ul>	N/A

	<ul style="list-style-type: none"> <li>• Emergency contact data</li> <li>• Criminal offence data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	
Completion of health survey	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Emergency contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Obligation</li> </ul>	N/A
Administration of referral forms	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Student School data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	N/A
My Support Plan	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Student school data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>	To help provide a coordinated support environment whilst learning.
Educational Health Care Plan	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Obligation</li> </ul>	N/A
Setting students up with online learning accounts and platforms	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Technical data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	To allow students access to software and platforms to benefit their learning.
Completion of attendance sheets	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	N/A
Disclosure of Police incident reports	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Criminal Convictions data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	N/A
Information surrounding student progress and behaviour	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Student school data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>	To offer a first-hand insight into the benefits of services that BJC has to offer.
To provide students with SENCo support	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Student School data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Obligation</li> </ul>	N/A

Completing and updating accident/incident records.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	N/A
Communications with email, text and post with parents/guardians	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Student school data</li> <li>• Parent/Guardian data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	To communicate with parents/guardians regarding the process of their child.

## 6. Who we share your personal data with:

In order to provide you with our services and meet our legal obligations, we only share your data with third parties, in the following circumstances:

- To fulfil a service;
- For a student's online studies;
- For school reporting circumstances;
- To awarding bodies; and
- Regulatory bodies to meet our legal obligations.

We'll never make your personal data available to anyone outside of Brian Jackson College for them to use for their own marketing purposes without your prior consent.

## 7. Transferring your personal information outside the EEA

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside the EEA, we have to tell you.

Currently, we do not use any third parties at BJC who store personal data outside of the EEA. Before sharing any information with a third party, we will ensure that there is a data processing agreement in place, requiring that the third party protects personal data in line with their obligations under UK Data Protection Law.

To find out more about how your personal information is protected when it is transferred outside the EEA, please contact our Data Protection Officer using the details in **Section 2** of this Privacy Policy. Before sharing any information with a third party, we will ensure that there is a data processing agreement in place requiring that the third party protects personal data according to the UK General Data Protection Regulation (UK GDPR).

## 8. How long do we keep your personal data?

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected. When assessing what retention period is appropriate for your personal data, we take into consideration:

- Any statutory or legal obligations;
- The requirements of BJC;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount and categories of your personal data; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

After such time, we will securely delete or destroy your personal data. In most instances the personal data processed by us this will be securely destroyed 6 years from when you cease to be a student.

We only hold CCTV data for a minimum period of 28 days, unless we are lawfully required to store the data for a longer period of time.

## **9. Your rights**

### **Right to be Informed**

We will always be transparent in the way we use your personal data. You will be fully informed about the processing through relevant privacy notices.

### **Right to Access**

You have a right to request access to the personal data that we hold about you and this should be provided to you, under the UK GDPR and the Data Protection Act 2018, within 1 month. If you would like to request a copy of your personal data, please contact us using the details at the top of this policy.

### **Right to rectification**

We want to make sure that the personal data we hold about you is accurate and up to date. If any of your details are incorrect, please let us know and we will amend them.

### **Right to erasure**

You have the right to have your data 'erased' in the following situations:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed.
- When you withdraw consent.
- When you object to the processing and there is no overriding legitimate interest for continuing the processing.

- When the personal data was unlawfully processed.
- When the personal data has to be erased in order to comply with a legal obligation.

If you would like to request erasure of your personal data, please contact us using the details at the top of this policy. Please note that each request will be reviewed on a case-by-case basis and where we have a lawful reason to retain the data, it may not be erased.

### **Right to restrict processing**

You have the right to restrict processing in certain situations such as:

- Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data.
- Where you have objected to processing and we are considering whether our legitimate grounds override your legitimate grounds.
- When processing is unlawful, and you oppose erasure and request restriction instead.
- Where we no longer need the personal data, but you require the data to establish, exercise or defend a legal claim.

### **Right to data portability**

You have the right to data portability in certain situations. You have the right to obtain and reuse your personal data for your own purposes via a machine-readable format, such as a .CSV file. If you would like to request portability of your personal data, please contact us. This only applies:

- To personal data that you have provided to us;
- Where the processing is based on your consent or for the performance of a contract; and
- When processing is carried out by automated means.

### **Right to object**

You have the right to object to the BJC processing your data in these circumstances:

- Where the processing is for direct marketing. Remember you can opt out of email communication at any time via the unsubscribe feature on our emails;
- Where the processing is based on legitimate interests; or
- Where the processing is for purposes of scientific/historical research and statistics.

## **10. Not Happy?**



Please let us know if you are unhappy with how we have used your personal data by contacting the Data Protection Officer (details can be found in **Section 2** of this Policy).

You also have a right to complain to the Information Commissioner's Office. You can find their contact details at [www.ico.org.uk](http://www.ico.org.uk). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.