



## **Privacy Notice**

### **WHO ARE WE?**

We are The Really NEET Project (“we”, “our”, “us”). We are the data controller of personal information about you.

Our Data Protection Officer is Katy Middleton-Groom. If you have any questions about this policy or the ways in which we use your personal information, please contact:

**[katy@reallyneetproject.co.uk](mailto:katy@reallyneetproject.co.uk)**

We are registered with the Information Commissioner’s Office under number: **ZA299095**.

### **THE DATA WE PROCESS**

We process data for a number of categories of data subjects. Please view the appropriate section below to read more.

### **STUDENTS**

#### **WHO ARE YOU?**

By students we mean individuals who are attending The Really NEET Project, have applied to one of our programmes or who have previously attended The Really NEET Project.

#### **HOW WE COLLECT PERSONAL DATA**

WE COLLECT DATA DIRECTLY FROM YOU IN A NUMBER OF WAYS INCLUDING:

- when you are referred to be a student
- when you become a student
- when you create and submit work
- when you participate in enrichment events
- when you use programme systems (in limited circumstances)

WE COLLECT DATA INDIRECTLY FROM A VARIETY OF SOURCES INCLUDING FROM:

- Local Authorities
- Previous educational settings
- EHCP's
- CCTV when you visit programme sites
- results from exam awarding organisations
- system logs that contain online identifiers such as IP addresses and cookie-related information
- photos and videos when we collect images at events or for evidence for qualifications

**WE CREATE INFORMATION THAT CAN IDENTIFY YOU IN A NUMBER OF WAYS INCLUDING:**

- details about your behaviour, progress, and targets
- attendance information, including sign-in/sign-out times

We aim to always ensure that you know we are processing your personal information except where it is disproportionately difficult to do so or when doing so would defeat our legitimate purpose (i.e. in the detection of fraud).

### **SPECIAL CATEGORY DATA PROCESSING**

Additional rules apply to the processing of special category data and, where we process this data, we need to tell you the additional lawful basis for processing.

In the event that you have an accident or injury whilst on site, the details of this will be recorded. Depending on the nature of the report, it may contain special category data.

If you need to take time off sick (including health issues related to the COVID-19 pandemic), The Really NEET Project will process your information as part of our legal obligations.

If The Really NEET Project determines it is necessary, we will share personal data that you have disclosed to us to the police, local authorities or youth services.

- Our lawful basis for processing in these cases is the 'Safeguarding of children and of individuals at risk' basis within the Data Protection Act 2018.

We process special category data such as disability, health and ethnicity in order to support diversity and equality in our workforce and in order to support our colleagues with disabilities whilst working for The Really NEET Project.

- Our lawful basis for processing in these cases is the 'equality of opportunity or treatment' basis within the Data Protection Act 2018.

### **OUR PURPOSE AND LAWFUL BASIS FOR PROCESSING**

We use your personal information to:

- process your referral and enrolment
- manage and administer your education
- meet our legal obligations
- perform tasks as a public authority
- monitor attendance and access to The Really NEET Project

This includes but is not limited to:

- processing your admission and transition
- putting together class lists and to allocate you to the correct classes for assessments
- putting together reports and registers
- making arrangements for exams or visits
- considering whether to offer you a place
- considering whether special provision or assistance is required for exams and visits
- telling other educational settings your attendance dates if you leave

### **WHO WE SHARE IT WITH**

We share your personal information with:

- anyone who works for us when they need it to do their job
- your next of kin
- emergency contacts, Local Authorities and youth services
- third party organisations that provide services to The Really NEET Project
- any organisation when we have a legal obligation/legitimate interest to do so
- organisations who provide services to us/you based on your consent or you opting in to these services
- anyone who you give us explicit permission to share it with

### **SHARING PERSONAL DATA**

In order to effectively operate, we need to share personal data from time to time. We only share the minimum amount of information required and where a lawful basis for us to do so has been identified.

The Really NEET Project will only appoint data controllers and data processors who can provide sufficient guarantees that the requirements of the UK GDPR will be met and your rights will be protected.

## **WHERE WE STORE YOUR DATA**

We do not store personal data outside the UK however we may use organisations to process data on our behalf that do so. We only allow data to be stored in countries that the UK has deemed to have adequate data protection regulations.

Where this is not possible, a legal safeguard will be in place to facilitate the transfer of data.

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

The storage of your personal data will be kept to a minimum, and personal data will not be stored for longer than required for the purpose of which it was collected.

## **YOUR RIGHTS**

Your data belongs to you; and your rights as the owner of your data are enforced by data protection legislation. A brief summary of your rights is presented below:

**Access your data:** You can access the information we hold on you at any time, by making a Subject Access Request. There are some exemptions to this right, which means you may not always receive all the information we process.

**Rectify your data:** You can ask us to correct or complete any information we hold about you that is inaccurate.

**Request erasure:** You have the right to 'be forgotten' in certain circumstances. This right is not absolute.

**Request the restriction of processing:** You may ask us to suspend the processing your data under certain circumstances. This right is not absolute.

**Request the transfer of your data:** In some cases, you can ask us to transfer the data you originally provided to us to you or to another organisation.

**Object to the processing of your data:** You can object to us processing your data. This right is not absolute.

**Object to automated decision-making:** You can object to us processing of your personal information where profiling is being used to make assumptions about your behaviours or preferences. The Really NEET Project does not undertake any automated decision-making.

## **HOW TO COMPLAIN**

If you believe data is being handled in a way that breaches data protection legislation, or you disagree with how we are processing your data, please contact our Data Protection Officer. You

also have the right to complain to the Information Commissioner’s Office (ICO). For more details you can visit their website at [ico.org.uk](http://ico.org.uk)

**CHANGES TO THIS POLICY**

This privacy notice will periodically be updated to ensure that it remains accurate and reflects changes in legislation, our practices and services. If they are significant changes, we will let you know.

<b>This policy was adopted by:</b> The Really NEET Project Ltd	<b>Date:</b> November 2024
<b>To be reviewed:</b> November 2025	<b>Signed:</b> Katy Middleton-Groom