How personal information of bursary applicants is used

Categories of pupil information collected

Depending on the eligibility and type of bursary applied for, the categories of evidential personal data we collect may include copies of: -

Defined vulnerable groups bursary	Discretionary bursary
• supporting letter from Key Worker or Social Worker • relevant benefits paperwork (dated 6 weeks prior to application) to evidence either Income Support, Universal Credit, Disability living Allowance, Personal Independence Payments, Employment and Support Allowance (ESA) or Universal Credit • a copy of the funding claim sent to the Student Bursary Support Service (SBSS) • evidence of payments received from the SBBS • a copy of the assessment to determine the actual financial need • receipts for purchases or details of in-kind support provided	• eligibility for Free School Meals • relevant paperwork i.e. Universal Credit Award notices for the last 3 months, Tax Credit award notifications form HMRC or other benefit letter from HMRC or Job Centre Plus (dated less than 3 months old) • SA302 form or annual accounts to prove self employment income, P60s, self employment accounts, wage slips • a copy of the assessment to determine the actual financial need (including a breakdown of the calculation that has determined the awarded amount) • receipts for purchases or details of in-kind support provided • evidence to support the value of any cash payments made to a student • attendance evidence to support payments where applicable

The process of collecting this pupil information and why

The data is observed as part of the bursary application process and provided to the school as evidence to support that application. Scanned copies of the evidence are made.

Storing this pupil data

Copies will be stored on a secure network folder accessible only by the Head of Sixth Form or the Business Support Officer (with a lead on Sixth Form). Successful applicant data will be kept for 6 years (and unsuccessful applicant data kept until the end of the academic year to which it relates) before it is permanently deleted.

The lawful basis under which we use this information

The UK General Dat Protection Regulation (GDPR) requires us to document the conditions which allow the processing of personal data. We primarily rely on GDPR Article 6(1)(c) and Article 6(1)(e) but were data contains special categories of data we rely on Article 9(2)(a) where consent is conditional for the application process.

For information, these articles are: -

- GDPR Article 6(1)(c)
  Processing is necessary for compliance with a legal obligation to which the controller is subject
- GDPR Article 6(1)(e)
  Processing is necessary for the performance of a task carried out in the public interest
- GDPR Article 9(2)(a)
  The data subject has given explicit consent to the processing of those personal data for one or more specified purposes

The legal (i.e. statutory) obligations referred to are: -

- the gov.uk funding regulations for post 16 provision
  www.gov.uk/government/publications/advice-funding-regulations-for-post-16-provision
- the gov.uk bursary fund guide
  www.gov.uk/government/publications/16-to-19-bursary-fund-guide-2022-to-2023-academic-year

Circumstances when we are or may be asked to share this data

We do not share information with third parties without the appropriate consent or unless there is a legal or statutory justification which requires or allows us to do so.

Law enforcement and government bodies

We will only share personal data with law enforcement and government bodies where we are legally required to do so such as: -

- the prevention or detection of crime and / or fraud
- the apprehension or prosecution of offenders
- the assessment or collection of tax owed to HMRC
- in connection with legal proceedings
- where the disclosure is required to satisfy our safeguarding obligations
- research and statistical purposes, but only where consent has been provided or where it has been sufficiently anonymised to the extent it can no longer identify anyone

Education and Skills Funding Agency

On the rare occasion it should occur, the Academy Trust Handbook gives audit access rights to authorised representatives from the Department for Education. 16 to 19 Bursary Funds are subject to normal assurance arrangements. Auditors will be looking for evidence that institutions have a clear bursary policy, have applied their bursary fund eligibility criteria correctly and used a consistent application and assessment process for all students and we must be able to demonstrate the appropriate processes are in place and records held.

Rights of access to data

Whilst the information is only required and collected as part of the bursary application process where those who choose to apply proactively do so, applicants do have access to the information we hold about them, and these rights further explained both in our main privacy notice (entitled Privacy notice | academy pupils and parents) and in Sections 5 to 11 of our Data protection policy.

Both are available on the policy pages of the school website under the heading 'Data protection policy, privacy notices and related documents'.
www.heronhallacademy.org.uk/Policies

Further information about rights is also available from the Information Commissioner' s website.
www.gov.uk/government/publications/data-protection-rights-for-data-subjects/data-protection-rights-for-data-subjects