

Roots *and* Shoots

Privacy Policy

Last Updated: 10 Mar 2025

Walnut Tree Walk, Kennington, SE11 6DN
Charity number: 1064070

Privacy Policy

The UK General Data Protection Regulation (GDPR) is a regulation in UK law on data protection and privacy for all individuals within the UK. It addresses the export of Personal Data outside of the UK.

UK GDPR gives everyone more control over their personal data and it is Roots and Shoots' responsibility to handle and use this information appropriately and securely. This Privacy Policy will explain how Roots and Shoots uses the personal data we collect from you, either when using our website, as a student potential or enrolled student of the college, or as a room hire client.

Root and Shoots may change this policy to match changes in information technology, data protection and regulations surrounding these matters. You should check for the latest policy version from time to time to ensure that you are happy with any changes.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our websites, you are accepting and consenting to the practices described in this Privacy Policy.

Topics:

- What this Privacy Policy is for
- Glossary of key terms
- What data do we collect?
- How do we collect your data?
- Our data sharing relationships are
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What This Privacy Policy Is For

This policy is intended to provide information about how Roots and Shoots will use (or "process") personal data about individuals including: its staff; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents"), donors or prospective supporters.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the obligations of Roots and Shoots to protect personal data.

This Privacy Policy applies alongside any other information Roots and Shoots may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Policy also applies in addition to Roots and Shoots' other relevant terms and conditions and policies, including:

- Any contract between Roots and Shoots and its staff or the parents of students;
- Any policies or notices applicable to staff concerning the handling of personal data;
- Roots and Shoots CCTV policy;
- Roots and Shoots safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- Roots and Shoots IT policies, including its Online Safety and Acceptable Use policies.

Anyone who works for, or acts on behalf of, Roots and Shoots (including staff, pupils, volunteers, trustees, friends and service providers) should also be aware of and comply with this Privacy Notice.

Glossary of Key Terms

"**Data Controllers**" means organisations that determine how people's personal data is processed and for what purpose.

"**Data Subjects**" means any living individuals whose data the Data Controller processes.

"**Processing**" means any action in relation to that personal data, including filing and communication.

"Personal Data" includes everything from which a Data Subject can be identified. It can be paper-based or electronically stored information relating to a living individual

who can be identified from information in our possession. Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour. This includes any expression of opinion about an individual and intentions towards an individual as well as fact. It also applies to photographs or video clips (including CCTV) or sound recordings of an identifiable individual.

Some categories of Personal Data are "**special category data**" under the GDPR (broadly equivalent to "sensitive" personal data under the old law, but with criminal data treated separately). These comprise data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; data concerning health or data concerning a natural person's sex life or sexual orientation; and (new to GDPR) biometric data. Extra safeguards are provided by law for processing of such data.

What Data Do We Collect?

Due to the complex nature of the work at Roots and Shoots, we collect differing levels of personal data on people depending on their connection with the organisation. The list of data collected below may not be all encompassing and special cases may require additional information to be stored in a highly limited fashion.

Roots and Shoots collects the following data on a regular basis.

- Students
    - Name, contact and emergency contact information, attendance data, ethnicity, health background, education background and record, criminal background, national insurance number. Under special circumstances we may collect limited, additional information to assist students with their education and careers programme.
- Staff
    - Name, contact and emergency contact information, ethnicity, health background and records, education background, criminal background, National Insurance number, bank account details, online presence search, photographs, training records and employment record.
- Venue hire clients
    - Contact information, billing information, invoice history, non-personally identifiable dietary information.
- All visitors, staff, trustees and students who connect to the internet via our network.
    - Non-personally identifiable URLs visited
- Donations and marketing
    - Name, contact information.
- Job applicants

    - Name, contact information, CV, information and references collected during the recruitment process.
- Volunteers (individuals)
    - Name, contact details, emergency contact information, criminal background.
- On-premises CCTV footage

How Do We Collect Your Data?

You directly provide Roots and Shoots with most of the data we collect. We collect data and process data when you:

- Apply for a student placement
- Apply for a job opening
- Apply to work as a volunteers, including trustees
- Complete a room booking form
- Agree to receive marketing communications

Our Data Sharing Relationships Are:

- For all government-funded work we deliver as Department for Education (DfE) grants or contracts, DfE will be the data controller, and Roots and Shoots will act as their data processor. Any third-party individual suppliers or organisations, who we commission to process data for DfE funded activities on our behalf will be our data sub-processors.
- However, the UK GDPR allows us to be a controller of the same data we process for DfE funded activities, provided we collect the data for a different purpose. Therefore, at the point of booking onto a DfE-funded course or by any other method, should you consent to receiving wider information and updates from Roots and Shoots and / or tell us you are happy to be contacted by us to provide information on our products and services, we will act as the controller of that data.
- We may process personal data that you provide to us directly (for example, through the websites that we operate, correspondence, phone, email, social media etc), via third parties who you have given permission to pass on your information, and from publicly available sources or otherwise.
- Roots and Shoots is registered as a data controller on the Information Commissioner's Office (ICO) **data protection register**.
- For students partaking in our work placements, we may share critical student information with work placement organisations to:
    - Enable a safe, legally compliant working environment.

        - This may include limited, summarised medical information, in case of workplace emergencies.
    - Contact details, CV, National Insurance numbers, employment and education histories

How Will We Use Your Data

Roots and Shoots collects your data so we can:

- Process student enrollment applications
- Process bursary payments for students
- Provide students with career guidance services
- Ensure safeguarding of our students
- Process job, volunteer and trustee applications
- Process room hire bookings
- Process staff payroll and PAYE taxes

Roots and Shoots does not share information with any third party companies for marketing purposes.

Roots and Shoots expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

- For the purposes of Student selection (and to confirm the identity of prospective pupils and their parents), and retain a record if appropriate for the purpose of future applications or openings;
- Management and support of staff, as detailed within the Staff Privacy Notice
- Maintaining relationships with alumni and the wider Roots and Shoots community through newsletters
- For the purposes of donor due diligence and research on prospective supporters, and to confirm the identity of prospective donors and relevant information about their background;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity (including gender and ethnicity) or gender pay gap analysis);
- To enable relevant authorities to monitor Roots and Shoots' performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective students
- To enable students to take part in assessments, and to publish the results of public examinations or other achievements of students of Roots and Shoots;
- To safeguard students' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of Roots and Shoots' IT and communications systems in accordance with Roots and Shoots' IT: Acceptable Use Policy;

- With written permission only, to make use of photographic images and recordings of students in Roots and Shoots' publications, on Roots and Shoots website and (where appropriate) on Roots and Shoots' social media channels
- For security purposes, including access control and CCTV in accordance with the relevant Roots and Shoots policies;
- For regulatory record keeping / compliance purposes in respect of immigration requirements, as an employer and/or visa sponsor.
- To carry out or cooperate with any Roots and Shoots or external complaints, disciplinary or investigation process.
- Where otherwise reasonably necessary for Roots and Shoots' purposes, including to obtain appropriate professional advice and insurance for Roots and Shoots.

In addition, Roots and Shoots will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of external trips who need to be made aware of dietary or medical needs;
- To comply with public health requirements in respect of Covid-19 (or similar) testing: including managing on-site testing and-or processing the results of tests taken by students or other members of the Roots and Shoots community, and sharing this information with relevant health authorities.
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff, for example DBS checks, welfare or pension plans;
- As part of any Roots and Shoots or external complaints, disciplinary or investigation process that involves such data, for example if there are special educational needs, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety and immigration / visa sponsorship compliance) and to comply with its legal obligations and duties of care.

Types Of Personal Data Processed By Roots And Shoots

This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- Personnel files, including in connection with employment or safeguarding;
- Nationality and other immigration status information (e.g. right to work / study), including copies of passport information;
- Where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- References given or received by the organisation about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students;
- Correspondence with and concerning staff, students and parents - past and present
- Images and video/audio recordings of pupils (and occasionally other individuals) engaging in activities including recorded lessons, and images captured by the organisation's CCTV system.

How Do We Store Your Data?

Roots and Shoots securely stores your data:

- On site, on computers with restricted access for relevant staff only.
- Hard copy student data is stored on site with restricted access for relevant staff only.
- On Google Drive, with restricted access for relevant staff only.
- All data held by Google is retained via Google Vault, which is strictly controlled and can only be accessed by authorised staff.

Data Retention

Roots and Shoots will retain your information as long as necessary and no longer. We recognise that any data stored is a potential risk factor for Roots and Shoots as well as any individual concerned. We are taking security precautions, however, the risk can never be zero. If there was a security breach, someone could see or use the data we hold. In light of this we aim to destroy or delete personal data as soon as it is not needed.

In some instances, we are obliged by law to keep it for a defined period and in this event, this negates your right to be forgotten. For example, we keep all financial

transactions for seven years as outlined by the Companies Act 2006. At the end of specified retention periods, we dispose of your data securely.

The data that we collect from you may be transferred to, and stored at, a destination outside the UK. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Google Workspace For Education

Google Workspace for Education is used heavily across the organisation, for educational and administrative uses.

Staff use a Roots and Shoots controlled Google account to access emails, files and secure access intranet pages. Staff access to files and personal information about staff, volunteers, students or anyone else is restricted only to those with legitimate operational, safeguarding and educational purposes.

All data from any Google Workspace app used by a Roots and Shoots controlled Google account is backed up via Google Vault. This data is discoverable only to staff authorised with super admin access to Google Workspace.

Google's Privacy Policy can be found here:
https://policies.google.com/privacy/update

Using their Google Workspace for Education accounts, staff may access and use the following "Core Services" offered by Google (described at https://workspace.google.com/terms/user_features.html):

Google provides information about the information it collects, as well as how it uses and discloses the information it collects from Google Workspace for Education accounts in its Google Workspace for Education Privacy Notice. You can read that notice online at https://workspace.google.com/terms/education_privacy.html

You may wish to review this information in its entirety, however below are some quoted answers to common questions:

Will Google Disclose My Child's Personal Information?

> *For external processing. Google may provide personal information to affiliates or other trusted businesses or persons to process it for Google, based on Google's instructions and in compliance with the Google Workspace for Education privacy notice and any other appropriate confidentiality and security measures.*

For legal reasons. Google will share personal information with companies, organisations or individuals outside of Google if it has a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- *Meet any applicable law, regulation, legal process or enforceable governmental request.*
- *Enforce applicable Terms of Service, including investigation of potential violations.*
- *Detect, prevent, or otherwise address fraud, security or technical issues.*
- *Protect against harm to the rights, property or safety of Google, Google users or the public as required or permitted by law.*

Google also shares non-personal information - such as trends about the use of its services - publicly and with its partners."

What If I Have More Questions Or Would Like To Read Further?

If you have questions about our use of Google Workspace for Education accounts or the choices available to you, please contact Marc Hankins, Senior Administrator at Roots and Shoots'.

If you want to learn more about how Google collects, uses, and discloses personal information to provide services to us, please review the Google Workspace for Education Privacy Center, the Google Workspace for Education Privacy Notice, and the Google Privacy Policy.

The Core Google Workspace for Education services are provided to us under Google's Apps for Education agreement.

Marketing

If you agree to sign up, Roots and Shoots may wish to send you information about products and services of ours that we think you might be interested in.

If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop Roots and Shoots from contacting you for marketing purposes.

Roots and Shoots does not share marketing data with any external parties and access to this data is restricted.

What Are Your Data Protection Rights?

Roots and Shoots would like to make sure you are fully aware of all your data protection rights.

What Data Protection Rights Do Staff Members Have?

The right to access
You have the right to request Roots and Shoots for copies of your personal data.

The right to rectification
You have the right to request that Roots and Shoots correct any information you believe is inaccurate. You also have the right to request Roots and Shoots to complete information you believe is incomplete.

What Data Protection Rights Do Students Have?

Due to legal obligation, under GDPR Article 6(1)(b) and (c) and Article 9(2)(g), students are entitled to the following:

The right to access
You have the right to request Roots and Shoots for copies of your personal data.

The right to rectification
You have the right to request that Roots and Shoots correct any information you believe is inaccurate. You also have the right to request Roots and Shoots to complete information you believe is incomplete.

What Data Protection Rights Do Members Of The Public Have?

The right to access
You have the right to request Roots and Shoots for copies of your personal data. You can find a Right of Access Data Request Form via our website, staff can find it via the intranet.

The right to rectification
You have the right to request that Roots and Shoots correct any information you believe is inaccurate. You also have the right to request Roots and Shoots to complete information you believe is incomplete.

The right to be informed
Transparency over how we use your personal information.

The right to restrict processing
You can ask us to stop using your information.

Right to be forgotten
You can ask us to remove your personal information from our records.

Right to object
Object / “opt-out” to the processing of your information for marketing purposes.

Right to data portability
Obtain and reuse your personal data for your own purposes.

Automated decision making and profiling
You can ask not to be subject to a decision when it is based on automated processing.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us via:
Email: office@rootsandshoots.org.uk
Phone: 020 7587 1131
Or write to us at: Roots and Shoots, Walnut Tree Walk, Kennington, London, SE11 6DN

Roots and Shoots Website

Cookie Policy

There are a number of different types of cookies, however our website uses:

- Functionality - Roots and Shoots uses these cookies so that we recognise you on our website and remember your previously selected preferences.
- We will retain and evaluate information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive.

It is important to Roots and Shoots that our website is easy to use, accessible and reliable. Small files, called cookies, place small amounts of information on your computer or other device used to access the internet, such as a mobile phone.

Cookies may be used on this site to help personalise your visit, to improve how you use the site and to record your online activity. This information cannot be used to identify you personally. You can disable cookies by adjusting your browser settings, but some functions of the site may not work correctly.

Specifically, Roots and Shoots uses cookies to measure how people are using the website so that we can improve the capacity and overall user experience.

Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store and use this information. See **Google's privacy policy** for more details.

In addition to Google Analytics, we also may use a range of other cookies, web beacons and flash cookies when relevant.

It is usually possible to stop your browser accepting cookies, or to stop it from accepting cookies from a particular website. All modern browsers allow you to change your cookie settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser. To understand these settings, the following links may be helpful, or you can use the 'Help' option in your browser for more details.

Links to other sites

Please note that Roots and Shoots is not responsible for the content on other websites.
If content is shared through social media, you may be sent cookies from those sites.

Roots and Shoots does not have any control over the content or security of other websites. We do not control the settings of these cookies and cannot be responsible for your privacy and protection if you choose to visit these websites. You should check third party sites for more information about the cookies they use and how to manage them.

How to manage cookies
You can set your browser preferences to not accept cookies, however, in a few cases, some of our website features may not function as a result.

Changes To Our Privacy Policy

Roots and Shoots keeps its privacy policy under regular review and places any updates on this web page / document.

How To Contact Us

If you have any questions about Roots and Shoots' privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email: office@rootsandshoots.org.uk
Phone: 020 7587 1131

Or write to us at:
Roots and Shoots, Walnut Tree Walk, Kennington, London, SE11 6DN

How To Contact The Appropriate Authority

If you would like to know more about your rights under the data protection law, wish to report a complaint or if you feel that Roots and Shoots has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

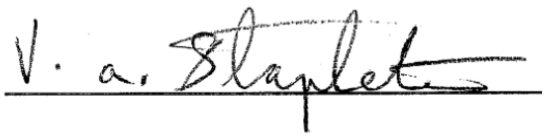
Website: https://ico.org.uk

Signed by the Director:



Date: 10 Mar 2025

Signed by the Chair of Trustees:



Date: 10 Mar 2025