

Policy and Procedure Title	Loughborough College Privacy Notice – Students
Date Approved	May 2018
Approved by	VP People and Planning
Date of Impact Assessment	
Next Review Date	April 2020
Executive Lead	VP People and Planning
Applicable to:	Students
Accessible to:	Staff and Students

1. Scope and Purpose

This privacy notice tells you about the information we process about you whilst you are a student at Loughborough College, and in some cases after you cease to be a student. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

2. Policy Statement

In order to comply with its contractual, statutory, and management obligations and responsibilities, Loughborough College is required to process personal data relating to its students, including ‘sensitive’ personal data, as defined in the EU’s General Data Protection Regulation and UK data protection laws which includes information relating to health, racial or ethnic origin, and criminal convictions.

All such data will be processed in accordance with the provisions of these laws and Loughborough College’s Policy on Data Protection, which may be amended from time to time. For the purposes of the Act and this notice, the term ‘processing’ includes the initial collection of personal data, the holding and use of the data, as well as access, disclosure, through to final destruction. In certain circumstances, the provisions of the Act and laws permit Loughborough College to process a student’s personal data, and, in certain circumstances, sensitive personal data, without their explicit consent. Further information on what data is collected and the purposes for which it is processed is given below in this notice.

The Data Protection Officer/GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Loughborough College collecting/processing their personal data.

Loughborough College staff who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject’s attention and their consent to the processing of their data is secured.

3. Equality Impact Assessment

This policy/procedure has been assessed for its impact on equal opportunities and will be informed by the aim to eliminate all forms of discrimination in all strands of the equal opportunities legislation

4. Privacy Notice

4.1. Who are we?

We are Loughborough College. Our address is Radmoor Road, Loughborough, Leicestershire. LE11 3BT. You can contact us by post at the above address, by email at dataprotection@loucoll.ac.uk or by telephone on +44 (0)1509 618 375.

We are required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to Ian Jones at DPO@loucoll.ac.uk or by using the address or phone number above.

4.2. What is personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

4.3. How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your interest in studying at Loughborough College;
- when you apply to study at Loughborough College and complete enrolment forms via the Universities and Colleges Admissions Service (UCAS), Loughborough College website and when you complete other admissions processes and procedures;
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
- in various other ways as you interact with us during your time as a student of Loughborough College, for the various purposes set out below;
- from third parties, for example from your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies.

4.4. The types of information we collect

We may collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number;
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results. We will also keep records

relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;

- information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a bursary or in order to provide you with appropriate pastoral care;
- sensitive personal data and information about criminal convictions and offences, including:
 - information concerning your health and medical conditions (e.g. disability and dietary needs);
 - certain criminal convictions (e.g. for students on nursing programs, following completion of an annual declaration of “good character”); and
 - information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

4.5. How we use information about our students

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

- recruitment and admissions;
- academic matters, including:
 - the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification, graduation);
 - maintaining student records;
 - assessing your eligibility for bursaries and scholarships, etc.
- providing library, IT and information services;
- non-academic matters in support of our core services, including:
 - providing student support services (e.g. through Additional Learning Support, Careers and Employability Service, Health and Wellbeing Service, Student Medical Centre, personal supervisors and academic departments);
 - monitoring equal opportunities;
 - safeguarding and promoting the welfare of students;
 - ensuring students' safety and security;
 - managing student accommodation;
 - managing the use of social media;
 - managing car parking on campus;
- administering finance (e.g. fees, scholarships and bursaries);

- meeting our legal reporting obligations (e.g. Government Departments, Awarding Bodies)
- other administrative purposes, including:
 - carrying out research and statistical analysis;
 - carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
 - providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice);
 - promoting our services (e.g. providing information about summer schools, student exchanges, or other events happening on and off campus);
 - preventing and detecting crime;
 - dealing with grievances and disciplinary actions;
 - dealing with complaints and enquiries.

4.6. Course completion, graduation and degree information

Personal data (including award and classification) will be published in the award ceremony booklet. This information will also be passed to third parties involved in the ceremonies (including our local paper and commemorative clothing suppliers). All published details will be available on our archive and our website following the relevant graduation events.

You may withhold your consent to your name being published for these purposes by contacting dpo@loucoll.ac.uk

4.7. The basis for processing your information and how we use it

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you are enrolled as a student, as part of the admissions process (e.g. to send you a prospectus or answer enquiries about our courses);
- once you have enrolled, to provide you with the services as set out in our Student Agreement;
- to deal with any concerns or feedback you may have;
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

- to provide you with educational services which may not be set out in our Student Agreement but which are nevertheless a part of our academic and educational mission;
- to monitor and evaluate the performance and effectiveness of the College, including by training our staff or monitoring their performance;

- to maintain and improve the academic, corporate, financial, estate and human resource management of the college;
- to promote equality and diversity throughout the college;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- recovering money you owe to us;
- for fundraising purposes.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional);
- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

4.8. Sharing information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited personal data to a variety of recipients including:

- our employees, agents and contractors where there is a legitimate reason for their receiving the information, including:
 - third parties who work with us to provide student accommodation;
 - third parties who work with us to provide student support services (e.g. counselling);
 - third parties who are contracted to provide out-of-hours IT services for us;
 - organisations operating anti-plagiarism software on our behalf (such as Turnitin®, for further details see our [Turnitin® UK Information for Students](#));
 - internal and external auditors.
- those with an interest in tracking student progress and attendance, including:

- student sponsors (e.g. the Student Loan Company, research sponsors, Research Councils);
- current or potential education providers (for example, where you take part in an exchange programme as part of your course);
- current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance);
- professional and regulatory bodies (e.g. Association of Accounting Technicians, Institute of Leadership and Management) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses;
- government departments and agencies where we have a statutory obligation to provide information (e.g. the Education and Skills Funding Agency, the Office for Students, the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes));
- crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
- parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure);
- third parties conducting surveys, for example the National Student Survey.

4.9. International data transfers

Some of the personal data we process about you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

4.10. Students' Union

We share some of the information we hold about you (including your name, date of birth, nationality, LC email address and programme of study) with Loughborough Students' Union (LSU) unless you notify us that you wish to opt out of LSU membership. LSU use this information to administer membership of the Students' Union.

4.11. Fundraising and Alumni Relations

We pass certain of your personal data to our Marketing and Alumni departments when you graduate. This information will be used for alumni activities, including sending Loughborough College publications, external destination surveys, promotion of alumni benefits, services, events and programmes.

4.12. National Student Survey and Leaver Surveys

Students may be included in surveys that track the progress of leavers in the years after they leave/graduate. If so, we will pass your contact details to the organisation that has been contracted to carry out that survey. The organisation will use your details only for that purpose and will then delete them.

If you do not want to take part in any of these surveys, please let us know at DPO@loucoll.ac.uk

4.13. Changes to your personal data

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. Some student details can only be changed in person, however we can advise further if you call into college reception, or email studentrecords.funding@loucoll.ac.uk

5. Accuracy of data

Loughborough College is required to take reasonable steps to ensure that any personal data it processes is accurate and up-to-date. It is the responsibility of the individual employee to inform Loughborough College of any changes to the personal data that they have supplied to it during the course of their employment by emailing studentrecords.funding@loucoll.ac.uk

6. Retention period

Loughborough College will process personal data for whilst you are an employee and will store the personal data for a period of time once you have ceased to be an employee. The retention period for different classifications of personal data has been established in line with information management guidelines. Please refer to Records Retention and Protection Policy (DP-P002) for more information on retention periods.

7. Individuals Rights

Under data protection legislation, you have the right to request access to information about you that we hold. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- *The right to be informed* - under transparency requirements in the new laws, you are informed about the collection and use of personal data
- *Right of access* – you have the right to request a copy of the information that we hold about you.
- *Right of rectification* - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- *The right to erasure* - in certain circumstances you can ask for the data we hold about you to be erased from our records
- *The right to restrict processing* - where certain conditions apply to have a right to restrict the processing of personal data
- *The right to data portability* - you have the right to have the data we hold about you transferred to another organisation
- *The right to object* - you have the right to object to certain types of processing such as direct

- marketing
- *Rights in relation to automated decision making and profiling* - you also have the right to be subject to the legal effects of automated processing or profiling

8. Requesting access to your personal data

To make a request for your personal information, contact Ian Jones (Data Protection Officer) at dpo@Loucoll.ac.uk If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or write to them at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

9. Further information

If you would like to discuss anything in this privacy notice, please contact: Ian Jones (Data Protection Officer) at dpo@Loucoll.ac.uk or the data protection advisor at Data.Protection@Loucoll.ac.uk