



Weston College **Group**

PRIVACY POLICY

PRIVACY POLICY

CONTENTS

1	PURPOSE	Error! Bookmark not defined.
2	SCOPE	Error! Bookmark not defined.
3	POLICY STATEMENT	Error! Bookmark not defined.
3.1	WHY WE COLLECT AND USE YOUR INFORMATION	
3.2	THE CATEGORIES OF PERSONAL INFORMATION WE PROCESS	
3.3	HOW WE COLLECT YOUR PERSONAL INFORMATION	
3.4	LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION	
3.5	SPECIAL CATEGORY CONDITIONS FOR PROCESSING	
3.6	SHARING YOUR PERSONAL INFORMATION	
3.7	DATA RETENTION	
3.8	DATA SECURITY	
3.9	TRANSFERRING DATA INTERNATIONALLY	
3.10	YOUR RIGHTS	
3.11	SAFEGUARDING, PREVENT AND CRIMINAL INVESTIGATIONS	
3.12	COMPLAINTS	
4	RESPONSIBILITIES	12
	Compliance, monitoring and review	12
	Reporting	12
	Records management	12
5	DEFINITIONS	Error! Bookmark not defined.
	Terms and definitions	Error! Bookmark not defined.
6	RELATED LEGISLATION AND DOCUMENTS	12
7	APPENDIX A	Error! Bookmark not defined.

Change Control

Version:	2.1
Date approved by CLB:	05/10/2019
Date approved by Corporation:	
Name of policy holder:	Matt Beaver
Date issued:	05/10/2019
Review date:	05/10/2020

Version	Type – New/Replacement/Review	Date	History
2.0	Replacement		To replace GDPR Policy
2.1	Review	05/10/2019	Comments and recommendations from Audit West

PRIVACY POLICY

2.2	Update	07/10/2019	Updated document based on Audit West recommendations
-----	--------	------------	--

This policy applies to Weston College Group and all wholly owned subsidiary companies of the Weston College Corporation which include OLASS, Forward Futures, SOMAX, Releasing New Potential, Inspirational Events and Investments

PRIVACY POLICY

1. PURPOSE

This privacy policy applies to the personal information processed by Weston College Group (WCG). It is intended to inform you about how and why we are using your personal information. It is our overarching privacy policy and it applies generally to the personal information that is collected and used across the WCG. It forms part of a wider family of data policies including Freedom of Information Policy, Information Security Policy, IT Acceptable Use Policy & Document Retention and Storage Policy and Procedure.

You have a legal right to be informed about how we use your personal information. This privacy policy is intended to explain what information we collect about you, how we'll use that information, who we'll share it with and what steps we'll take to make sure it stays private and secure. It is intended for our learners, staff, contractors & visitors and we encourage all to read it. It will continue to apply even when you no longer have an active relationship with WCG.

You should read this data privacy policy alongside any terms and conditions, contracts agreements or policies issued.

For the purposes of data protection law, [Weston College Group] is the 'data controller'. Our Data Protection Officer is: **Peter Solman**.

2. SCOPE

This policy applies to any personal data where WCG is the Data Controller. We may also use 'data processors' to process personal information on our behalf and will inform you where this is the case and comply with data protection legislation.

3. POLICY STATEMENT

All personal information used by the WCG is collected, stored and processed following best practice recommendations and in compliance with current regulations and data protection law including The General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA). You have a number of rights relating to our use of your personal information which are explained in Section 3.10 of this document.

Our aim is to always provide clear information about the personal information we are using and why we are using it. We endeavour to keep the language in our privacy policy and supporting privacy notices as simple as possible, however if anything is unclear or if you have any concerns then you can contact us here data.protection@weston.ac.uk.

3.1 Why we collect and use your information

We process personal information to be able to run the WCG and manage our subsidiary organisations. We use it to make sure that we can provide excellent services and look after our learners, staff and other service users appropriately. We may collect information directly from you or from other third parties.

PRIVACY POLICY

Weston College collects, stores, process and share a range of information which can be directly associated to you as an individual. While much of the personal information that we collect is mandatory i.e. it must be provided so that we can manage the college, teach students and keep service users and staff safe, some of it is requested on a voluntary basis. Where this is the case, we will seek your consent at the point we collect the information. We will explain to you whether there is a requirement to provide certain information to us, or whether you have a choice in doing so. Where we process your personal data on the basis of consent, you may withdraw your consent at any time.

3.2 The categories of personal data we process

We have grouped the types of personal information that we may collect and use about you into categories of personal data. These are described in the table below. This is non-exhaustive however it aims to provide you with an overview of some of the main categories of personal data that is processed by the WCG and our subsidiaries. For more information please contact data.protection@weston.ac.uk.

Personally Identifiable Information

Type of Data	Examples
Personal Information	Personal data is information that relates to an identified or identifiable individual. It may include general information about you including your title, name/s, date of birth & gender, car registration number.
Special Category Information	We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law including; race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life, sexual orientation & criminal convictions.
Contact Details	Any information used to contact you including postal addresses, phone numbers & email addresses.
Professional Information	Any information relating to qualifications, employment history & character / working references.
Study related Information	Any information relating to your studies including work you have submitted, workbooks, assignments & photographic / audio / video recorded evidence of your work.
Identification Information	Any information used to confirm your identity including your photograph, national insurance number, passport & CCTV images.
Welfare Information	Any information in relation to your welfare including pastoral care records, counselling records & grievance / disciplinary information. Health & sex life information is categorised as Special Category Information.

PRIVACY POLICY

Financial Information	Any financial information including bank details, bursary information & payment history
Authentication Information	Your signature or password used to authenticate your identity
Technical Data	Any information used to confirm your digital presence including IP addresses, login information, location data & device information.
Market Research Data	Any information relating to marketing preferences or surveys you have completed.
Other Information You Give Us	Any other information you submit via forms or communicate verbally, by phone, emails, digital messages & social media.

Where we process criminal convictions, we must identify additional ground for processing under Article 10 of the GDPR. Information relating to criminal convictions will only be requested and processed by WCG where we have a legal obligation to do so in relation to safeguarding, preventing fraud where you have given your consent.

In addition to this information WCG also collects, stores, processes and shares a range of information which is anonymised and **cannot** be directly associated to you as an individual, this aggregated statistical data is used for business intelligence purposes. This is not included within the scope of this policy as it is not personal data.

3.3 How We Collect Your Information

We use various methods to collect your personal information either directly from you or via third parties. We will provide any relevant privacy information including our lawful basis for processing at the point at which we collect personal data from you unless there is a lawful or other legitimate reason not to do so (for example where it is for the prevention or detection of crime).

Examples of the ways in which we collect your personal information are provided in the table below:

Collection Method	Examples
Directly from you	We collect personal information directly from you by submitting forms, sending post / emails or giving information via the telephone.
Indirectly	We may record some information about you indirectly for example about your attendance, performance & behaviour for example notes taken from your tutorials or appraisals.
Automated / Computer Logs and CCTV	We collect personal information when you use College equipment or interact with websites or online services. All College campuses record CCTV footage for security purposes.

PRIVACY POLICY

Third Parties	<p>We may collect some publicly available personal information from the following 3rd party sources</p> <ul style="list-style-type: none">• Internet Search Engines• Social Media• Companies House• Electoral Register <p>We may collect personal information from the following 3rd Party sources</p> <ul style="list-style-type: none">• Previous employers• Previous educational establishments• Exam Bodies• Education Skills Funding Agency (ESFA) <p>WCG is a member of the Multi Agency Panel for safeguarding and prevent terrorism as part of this panel, we may collect personal information from:</p> <ul style="list-style-type: none">• Local Authority• Police Authority• Counter Terrorism Intelligence Unit• Other Members of the Multi Agency Panel <p>We may collect information from the following sources to assist you with Additional Learning Support (ALS) or to enable us to understand and meet the requirements of an Education Health Care Plan (EHCP)</p> <ul style="list-style-type: none">• Child & Adolescent Mental Health Services (CAMHS)• Coast Resource Centre• Counselling Services• Doctor / General Practitioner (GP)• Health Professionals• Local Authority• Mentoring Services• Police Authority• School• Social Care• Speech and Language Therapist <p>Commercial driving courses</p> <ul style="list-style-type: none">• DVLA <p>Prison Education may use the following sources to confirm or correct any personal information you give us</p> <ul style="list-style-type: none">• Ministry of Justice (MOJ) - Prison National Offender• Management Information System (pNOMIS) <p>For employment opportunities we may collect personal information about you from the following organisations</p> <ul style="list-style-type: none">• HM Government Disclosures & Barring Service• Ministry of Justice Security Clearance Service• Recruitment Agencies

PRIVACY POLICY

3.4 Lawful Basis for Processing Your Information

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are provided under Article 6 of the GDPR.

We have explained our lawful bases for processing personal data more fully in Appendix A. As described above, WCG processes a wide range of personal data for a variety of purposes and the lawful bases that we rely upon may therefore vary depending on our purpose for processing. Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data.

Wherever possible our lawful basis for processing will be clear at the point at which we collect personal information from you unless there is a lawful reason not to do so.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so. We will then cease this aspect of processing, unless another lawful basis applies. When processing your personal information Weston College will always use one of the following “Lawful bases for processing”:

Lawful Basis	Examples
Consent	Where you have asked us to and have provided your consent (for example a photo of you for promotional purposes or our website). You may withdraw your consent at any time.
Contract	Where we need to process personal information for the purposes of entering into a contract with you for example Learner Agreement or Employment Contract.
Legal Obligation	Where we need to process personal data to comply with the law and we have a legal or regulatory requirement to do so for example [To report Safeguarding concern or to meet EHCP requirements]
Vital Interest	Where we need to protect your vital interests (or someone else's interests). This relates to life and death situations.
Public Task	Where we need to carry out a task in the public interest which is laid down in law, for example where some of the collection and use of student information is necessary for us to perform our role as an education provider in line with The Further and Higher Education Act 1992.
Legitimate Interest	When it is in ours or a third party's legitimate interests to process personal data. Where this is the case we will ensure that we have considered whether or not our legitimate interests are overridden by your rights and freedoms

Further information on the definitions of these “lawful basis for processing” are available on the Information Commissioner's Office (ICO) website.

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>

PRIVACY POLICY

3.5 Special Category Conditions

Where we process information about you that falls into "special categories" of more sensitive personal data, we will identify an additional condition for processing under Article 9 of the GDPR.

These conditions may vary and will be explained in relevant privacy notices but more common reasons may include where processing sensitive data is necessary for reasons of 'substantial public interest' such as safeguarding, statutory and government purposes, or for ensuring equality of opportunity or treatment. We may also require your explicit consent for things such as the use of unique identifiers or we may need to share health data to maintain a person's vital interests where they are unable to give consent (life and death situations) or for the purpose of medical diagnosis or ensuring staff are aware of allergies.

Special category data is personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation

3.6 Sharing your Personal Data

To ensure we can deliver excellent services and meet our legal and regulatory obligations WCG may need to share your personal data with a number of other organisations.

Weston College will only share personal data with other organisations where it is necessary and lawful to do so. All organisations are risk assessed before sharing your data and we establish agreed terms with data sharing / non-disclosure agreements to ensure your data remains secure and is only used for the agreed purposes.

Examples of where we may share your data (where it is fair and lawful to do so) include parents/guardians, previous or subsequent school/college/universities, Local Authority, careers advisory services, employers, Awarding Bodies, health professionals, law enforcement agencies, Student Loans Company and UCAS. The tables in Appendix A of this document describe who we may share data with.

There are also occasions where we need to engage the services of third-party organisations to process personal data on our behalf. For example, where WCG engages in the use of software for a specific purpose or where we use another organisation to analyse data on our behalf. In these circumstances it should be considered that Weston College are the Data Controller and the 3rd Party are Data Processors unless otherwise indicated. Where this is the case a written contract will be entered into with the third-party data processor as per Article 28 of The GDPR in respect of the personal data being processed..

3.7 Data Retention

PRIVACY POLICY

Weston College only retain personal information for as long as it is necessary to complete the purpose it has been collected for and to complete any legal, regulatory, accounting or reporting requirements.

Personal data is stored in line with our Document Retention and Storage Policy in a range of different places including within student files and our IT systems including WCG's email system.

The information that we create and maintain is kept secure. We may retain certain information about you after your relationship with us has ended, as deemed necessary and in line with our retention policy.

Further details of the retention of data can be found within the College's Data Retention Policy.

Staff data is kept in line with the HR Data Retention Policy.

Weston College may retain information which anonymised and **cannot** be directly associated to you as an individual, this aggregated, statistical data is used for business intelligence purposes. This is outside of the scope of this Policy as it is not personal data.

3.8 Data Security

The information that we create and maintain is kept secure and in line with Information Security Policy.

Weston College take Information Security very seriously and are certified to the following best practice standards

- Cyber Essentials *Certificate Number QGCE1054-1*
- ISO 27001 *Certificate Number IS 656993*

If you have any data security concerns or have any information relating to a potential information security incident please contact the IT Department on 01934 411425 or it.helpdesk@weston.ac.uk.

3.9 Transferring data internationally

Where we transfer personal data to a country or territory outside of the UK, we will do so in accordance with data protection law and ensure that we have sufficient safeguards in place.

3.10 Your Rights

Under the Data Protection laws of the UK you have the following rights:

- To be informed how we will use your personal data
- to have access to your personal data
- to request correction of your personal data
- to request erasure of your personal data
- to object to processing of your personal data
- to request restriction of processing your personal data

PRIVACY POLICY

- to request transfer of your personal data
- to withdraw consent
- to object to any direct marketing
- to object to any automated decision-making
- to make a complaint to the Information Commissioner's Office about the handling of your personal data

Some of these rights have conditional requirements

3.10.1 Exercising Your Rights

If you would like to exercise any of these rights, please email your request to data.protection@weston.ac.uk or contact [01934 411411]

3.10.2 What We Need From You

We may need to request specific information from you to enable us to quickly identify your information and ensure we protect the rights of others information.

Your request **must not be manifestly unfounded or excessive**

3.10.3 Fees

You will not be required to pay a fee for a legitimate request to exercise your rights.

All information will be provided electronically unless otherwise requested. We may charge a "reasonable fee" for the administrative costs of complying with the request if it is manifestly unfounded or excessive; or where someone requests further copies of their data following a request

3.10.4 Time to Respond

We will **acknowledge your request within 1 week** and you will **receive a response within 1 month**. Occasionally this may need to extend the time to respond by a further two months if the request is complex or if we have received a number of requests from the individual. Where this is the case we will let you know within one month of receiving the request and explain why the extension is necessary we will inform you if this is the case and keep you up to date with progress.

3.10.5 Our Right to Refuse a Request

Data Protection laws say that your request must not be manifestly unfounded or excessive, if we deem this is the case we may refuse to comply with the request or charge a reasonable fee for processing it.

3.11 Safeguarding, Prevent and Criminal Investigations

Weston College work closely with local authorities and Police to ensure the safety and rights of individuals. Where it is necessary and lawful to do so Weston College may share relevant data or information relating to a safeguarding, prevent or criminal investigation with an investigating authority.

Weston College reserve the right to report any information considered to be fraudulent or related to a cyber offence to the police for investigation.

3.12 Complaints

PRIVACY POLICY

If you have a concern or complaint about the way we are collecting or using your personal data, please raise your concern with us in the first instance data.protection@weston.ac.uk.

The Information Commissioner's Office, which is the supervisory authority, may be contacted on 0303 123 1113, or via their website, www.ico.org.uk regarding any complaints about how the way that WCG handles your data. However under usual circumstances it may expect you to contact us first to see if we can help to resolve the issues first.

If you would like to discuss anything in this privacy notice, please contact: data.protection@weston.ac.uk or our Data Protection Officer Peter Sloman.

4. RESPONSIBILITIES

4.1 Compliance, monitoring and review

This document will be reviewed annually by the Weston College Group's Data Privacy Management Group (DPMG)

The Weston College's appointed Data Protection Office (DPO) who can be contacted using the following details

Data Protection Officer

Name: Mr. Peter Sloman
Email: data.protection@weston.ac.uk
Address: Weston College
Knightstone Campus
Knightstone Road
Weston-super-Mare
BS23 2AL

4.2 Reporting

The Weston College Group's Data Privacy Management Group (DPMG) is responsible for the management, reviewing and reporting of this policy to Leadership Board & the Governing Body

4.3 Records management

This policy will be maintained as part of the Information Management System (ISMS) as part of the College ISO 27001 certification

5. RELATED LEGISLATION AND DOCUMENTS

Legislation

- Data Protection Act 2018
- General Data Protection Regulation 2018

PRIVACY POLICY

Privacy and Electronic Communications Regulations (PECR)WCG Policies:

- Data Protection Policy
- Freedom of Information Policy

6. APPENDIX A

Purpose for Using Your Information

We have identified the purpose, the types of data, how the data is collected, the lawful basis for processing & who information needs to be share with in the tables below.

The tables below have been split in to the following categories of people who interact with the Weston College Group

- Learners
- Employee / Contractors
- Forward Futures
- General Public / Visitors
- Prison Education
- Inspirational Events & Innovations (IEI) Clients & Visitors

Learners

Purpose	Type(s) of Data <i>Described in Section 3</i>	Collection Method(s) <i>Described in Section 4</i>	Lawful Basis <i>Described in Section 5</i>	Special Category Data	Data Shared with <i>Described in Section 6</i>
To enrol as a learner	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Identification Information • Welfare Information • Financial Information • Authentication Information • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Internal Auditors • External Auditors • Department for Education - PLR

PRIVACY POLICY

<p>To deliver education services to you</p>	<ul style="list-style-type: none"> • Personal Information • Study related Information • Identification Information • Technical Data 	<ul style="list-style-type: none"> • Directly from you • Indirectly • Automated / Computer Logs • Third Parties 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Education software providers • Parents & Guardians (if under 18) • Partner Universities (HE) • Employers (Apprenticeships) • OFSTED • Office for Students (OfS) (HE) • Learning Plus UK (LPUK) • LA (sept guarantee) • Former School
<p>To provide Not in Employment, Education or Training (NEET) information to Local Authorises</p>	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Public Task 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Local Authorities
<p>To provide additional learner support and meet the requirements of an EHCP</p>	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Identification Information • Welfare Information • Authentication Information • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you • Indirectly • Third Parties 	<ul style="list-style-type: none"> • Legal Obligation 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Child & Adolescent Mental Health Services (CAMHS) • Coast Resource Centre • Counselling Services • Doctor / General Practitioner (GP) • Health Professionals • Local Authority • Mentoring Services • Police Authority • School • Social Care • Speech and Language Therapist

PRIVACY POLICY

To take you on educational visits	<ul style="list-style-type: none"> • Personal Information • Contact Details • Identification Information • Welfare Information • Financial Information • Authentication Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Contract • Vital Interest 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Travel Agency • Hotel • Airline • Police • Hospital • Insurance
To take payment for goods & services via our online shop	<ul style="list-style-type: none"> • Personal Information • Contract Information • Financial Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None
To assess your entitlement & to pay you bursary payments	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Identification Information • Welfare Information • Financial Information • Authentication Information 	<ul style="list-style-type: none"> • Directly from you • Third Parties (Local Authority provide carer information) 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • ESFA
To keep you informed of important information directly relating to your education service by SMS message	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Contract 		
To provide you with pastoral care and keep people safe including Safeguarding & PREVENT responsibilities	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly from you • Indirectly • Automated / Computer Logs • Third Parties 	<ul style="list-style-type: none"> • Public Task • Legal Obligation • Vital Interest 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Local Authority (LA) • National Health Service (NHS) • Health & Safety Executive (HSE)

PRIVACY POLICY

	<ul style="list-style-type: none"> • Identification Information • Welfare Information • Authentication Information • Technical Data • Other Information You Give Us 				<ul style="list-style-type: none"> • Multi Agency Panel Members • Police Authority • Next of Kin • Voluntary Organisations (for support reasons only) • Charities (for support reasons only)
To help ensure the security of individuals and property including the use of CCTV	<ul style="list-style-type: none"> • Personal Information • Contact Details • Identification Information • Technical Data 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	•	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss Adjusters • Legal Representation
To record information in the event of a Health & Safety incident	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Identification Information • Welfare Information • Authentication Information • Technical Data • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	•	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss adjusters • Legal reps • Medical Professionals • Health & Safety Executive • Environmental Health
To help plan your Travel to College	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly 	<ul style="list-style-type: none"> • Public Task 	•	<ul style="list-style-type: none"> • Local Authority

PRIVACY POLICY

	<ul style="list-style-type: none"> • Other Information You Give Us 				
To fund your education	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Welfare Information • Financial Information • Market Research Data 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Local Authority (LA) • Education and Skills Funding Agency (ESFA) • The Department for Education (DfE) (Data Controller) • Office for Students (HE) • HMPPS/MOJ • National Apprenticeship Services • Awarding organisations
To keep you informed of services, events and promotions	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Consent 		
To help promote the College and its services	<ul style="list-style-type: none"> • Personal Information • Professional Information • Study related Information • Identification Information • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Consent • Contract 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Photographer • Press • Social Media • Design Agency • Learners Schools • Business Related to Learner
To provide enrichment activities to compliment your studies	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Legitimate Interest 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •

PRIVACY POLICY

	<ul style="list-style-type: none"> Welfare Information Authentication Information Other Information You Give Us 				
To find you a work placement for an apprenticeship, industry placement or work experience placement	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Professional Information Study related Information Identification Information Other Information You Give Us 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Employers
To provide you with a customised content and prevent you from having to re-enter information including authentication details	<ul style="list-style-type: none"> Personal Information Contact Details Identification Information Authentication Information Technical Data 	<ul style="list-style-type: none"> Directly from you Automated / Computer Logs 	<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Website host Education software providers
To provide parents / carers with progress of learner journey (Student aged 18 years and under in the academic year of study or 24 years and under and have an EHCP)	<ul style="list-style-type: none"> Personal Information Professional Information Study related Information 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Parents / Carers

PRIVACY POLICY

--	--	--	--	--	--

Parent, Carers & Emergency Contacts

Purpose	Type(s) of Data <i>Described in Section 3</i>	Collection Method(s) <i>Described in Section 4</i>	Lawful Basis <i>Described in Section 5</i>	Data Shared with <i>Described in Section 6</i>
To assess learner's entitlement & to pay bursary payments	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Identification Information Welfare Information Financial Information Authentication Information 	<ul style="list-style-type: none"> Directly from you Indirectly Third Parties (LA carer information) 	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> ESFA
To contact a learners Next of Kin or emergency contact in an emergency	<ul style="list-style-type: none"> Personal Information Contact Details 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Vital Interest Legitimate Interest 	
To provide progress of learner journey of learners under 18 years old	<ul style="list-style-type: none"> Personal Information Contact Details 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Contract 	
To record information in the event of a Health & Safety incident	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Professional Information Identification Information Welfare Information Authentication Information Technical Data Other Information You Give Us 	<ul style="list-style-type: none"> Directly Indirectly Automated / Computer Logs 	<ul style="list-style-type: none"> Legal Obligation Legitimate Interest 	<ul style="list-style-type: none"> Security Consultant Police Authority Insurance / Loss adjusters Legal reps Medical Professionals Health & Safety Executive Environmental Health

PRIVACY POLICY

	•			
To help ensure the security of individuals and property including the use of CCTV	<ul style="list-style-type: none"> Personal Information Contact Details Identification Information Technical Data 	<ul style="list-style-type: none"> Directly Indirectly Automated / Computer Logs 	<ul style="list-style-type: none"> Legal Obligation Legitimate Interest 	<ul style="list-style-type: none"> Security Consultant Police Authority Insurance / Loss adjusters Legal Representation
To keep you informed of services, events and promotions	<ul style="list-style-type: none"> Personal Information Contact Details Professional Information 	<ul style="list-style-type: none"> Directly from you 	<ul style="list-style-type: none"> Consent 	
To help promote the College and its services	<ul style="list-style-type: none"> Personal Information Professional Information Study related Information Identification Information Other Information You Give Us 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Consent Contract 	<ul style="list-style-type: none"> Photographer Press Social Media Design Agency Learners Schools Business Related to Learner

Employee / Contractor

Purpose	Type(s) of Data <i>Described in Section 3</i>	Collection Method(s) <i>Described in Section 4</i>	Lawful Basis <i>Described in Section 5</i>	Data Shared with <i>Described in Section 6</i>
To process your application for a job	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Professional Information Identification Information Financial Information Authentication Information 	<ul style="list-style-type: none"> Directly from you 	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Referees
To process your employment contract	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Contract Legal Obligation 	<ul style="list-style-type: none"> HMRC Pension services Security services

PRIVACY POLICY

	<ul style="list-style-type: none"> Professional Information Identification Information Welfare Information Financial Information Authentication Information 			<ul style="list-style-type: none"> Disclosure and Barring Service Prison services (where applicable) Occupational health
When accepting a consultancy contract	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Professional Information Identification Information Financial Information Authentication Information Other Information You Give Us 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Contract Legal Obligation 	<ul style="list-style-type: none"> Service services (where applicable) Disclosure and Barring Service (where applicable)
To provide reference	<ul style="list-style-type: none"> Personal Information Contact Details Welfare Information Financial Information 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Legitimate Interest 	<ul style="list-style-type: none"> Prospective Employer
To improve our services	<ul style="list-style-type: none"> Personal Information Contact Details Professional Information Other Information You Give Us 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Legitimate Interest 	<ul style="list-style-type: none"> Best practice review organisations (for example The Times Best Employers)
To record information in the event of a Health & Safety incident	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Professional Information Identification Information Welfare Information Authentication Information Technical Data 	<ul style="list-style-type: none"> Directly Indirectly Automated / Computer Logs 	<ul style="list-style-type: none"> Legal Obligation Legitimate Interest 	<ul style="list-style-type: none"> Security Consultant Police Authority Insurance / Loss adjusters Legal reps Medical Professionals Health & Safety Executive Environmental Health

PRIVACY POLICY

	<ul style="list-style-type: none"> • Other Information You Give Us • 			
To help plan your Travel to College	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Public Task 	<ul style="list-style-type: none"> • Local Authority
To help ensure the security of individuals and property including the use of CCTV	<ul style="list-style-type: none"> • Personal Information • Contact Details • Identification Information • Technical Data 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss adjusters • Legal Representation
To help ensure the security of individuals and property including the use of CCTV	<ul style="list-style-type: none"> • Personal Information • Contact Details • Identification Information • Technical Data 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss adjusters • Legal Representation
To keep you informed of services, events and promotions	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Consent 	
To help promote the College and its services	<ul style="list-style-type: none"> • Personal Information • Professional Information • Study related Information • Identification Information • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Consent • Contract 	<ul style="list-style-type: none"> • Photographer • Press • Social Media • Design Agency

Forward Futures

Purpose	Type(s) of Data	Collection Method(s)	Lawful Basis	Data Shared with
	<i>Described in Section 3</i>	<i>Described in Section 4</i>	<i>Described in Section 5</i>	<i>Described in Section 6</i>

PRIVACY POLICY

To process your application for a job	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Identification Information • Financial Information • Authentication Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • Referees
To process your employment contract	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Identification Information • Welfare Information • Financial Information • Authentication Information 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Contract • Legal Obligation 	<ul style="list-style-type: none"> • HMRC • Pension services • Disclosure and Barring Service • Prison Security Services (where applicable)
To keep you informed of your employment contract	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Identification Information • Welfare Information • Financial Information • Authentication Information 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Contract • Legal Obligation 	
To provide reference	<ul style="list-style-type: none"> • Personal Information • Contact Details • Welfare Information • Financial Information 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Legitimate Interest 	<ul style="list-style-type: none"> • Prospective Employer
To improve our services	<ul style="list-style-type: none"> • Personal Information • Contact Details 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Legitimate Interest 	<ul style="list-style-type: none"> • Best practice review organisations (for example The Times Best Employers)

PRIVACY POLICY

	<ul style="list-style-type: none"> Professional Information Other Information You Give Us 			
To record information in the event of a Health & Safety incident	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Professional Information Identification Information Welfare Information Authentication Information Technical Data Other Information You Give Us . 	<ul style="list-style-type: none"> Directly Indirectly Automated / Computer Logs 	<ul style="list-style-type: none"> Legal Obligation Legitimate Interest 	<ul style="list-style-type: none"> Security Consultant Police Authority Insurance / Loss adjusters Legal reps Medical Professionals Health & Safety Executive Environmental Health
To help ensure the security of individuals and property including the use of CCTV	<ul style="list-style-type: none"> Personal Information Contact Details Identification Information Technical Data 	<ul style="list-style-type: none"> Directly Indirectly Automated / Computer Logs 	<ul style="list-style-type: none"> Legal Obligation Legitimate Interest 	<ul style="list-style-type: none"> Security Consultant Police Authority Insurance / Loss adjusters Legal Representation
To help promote the College and its services	<ul style="list-style-type: none"> Personal Information Professional Information Study related Information Identification Information Other Information You Give Us 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Consent Contract 	<ul style="list-style-type: none"> Photographer Press Social Media Design Agency

General Public / Visitors

Purpose	Type(s) of Data <i>Described in Section 3</i>	Collection Method(s) <i>Described in Section 4</i>	Lawful Basis <i>Described in Section 5</i>	Data Shared with <i>Described in Section 6</i>
---------	--	---	---	---

PRIVACY POLICY

<p>To record your visit to the campus and issue you a visitor's badge</p>	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Legitimate Interest • Public Task 	
<p>To record information in the event of a Health & Safety incident</p>	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Identification Information • Welfare Information • Authentication Information • Technical Data • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss adjusters • Legal reps • Medical Professionals • Health & Safety Executive • Environmental Health
<p>To help ensure the security of individuals and property including the use of CCTV</p>	<ul style="list-style-type: none"> • Personal Information • Contact Details • Identification Information • Technical Data 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss adjusters • Legal Representation
<p>To keep you informed of services, events and promotions</p>	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information 	<p>Directly from you</p>	<p>Consent</p>	
<p>To help promote the College and its services</p>	<ul style="list-style-type: none"> • Personal Information • Professional Information • Study related Information • Identification Information • Other Information You Give Us • 	<ul style="list-style-type: none"> • Directly from you Indirectly 	<ul style="list-style-type: none"> • Consent Contract 	<ul style="list-style-type: none"> • Photographer • Press • Social Media • Design Agency

Prison Education

PRIVACY POLICY

Purpose	Type(s) of Data <i>Described in Section 3</i>	Collection Method(s) <i>Described in Section 4</i>	Lawful Basis <i>Described in Section 5</i>	Data Shared with <i>Described in Section 6</i>
Enrol and fund your education	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Professional Information • Study related Information • Authentication Information • Technical Data • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you • Third Parties (p-NOMIS) 	<ul style="list-style-type: none"> • Contract • Legal Obligation • Public Task 	<ul style="list-style-type: none"> • HMPPS • OFSTED
Register for Qualification	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Study related Information • Authentication Information 	<ul style="list-style-type: none"> • Directly from you • Third Parties (p-NOMIS) 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • HMPPS • OFSTED • Awarding Bodies
Assessment academic level	<ul style="list-style-type: none"> • Personal Information • Study related Information • Technical Data 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • HMPPS • BKSB • OFSTED
To deliver education services to you	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Professional Information • Study related Information • Authentication Information • Technical Data • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you • Indirectly • Automated / Computer Logs • Third Parties (LRS - Learner Record Service) 	<ul style="list-style-type: none"> • Contract 	<ul style="list-style-type: none"> • HMPPS • OFSTED • Awarding Bodies
To provide additional learner support	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Professional Information • Study related Information • Welfare Information • Authentication Information 	<ul style="list-style-type: none"> • Directly from you • Third Parties (p-NOMIS) 	<ul style="list-style-type: none"> • Contract • Legal Obligation 	<ul style="list-style-type: none"> • HMPPS • OFSTED • Awarding Bodies

PRIVACY POLICY

	<ul style="list-style-type: none"> Other Information You Give Us 			
To improve our services	<ul style="list-style-type: none"> Personal Information Professional Information Study related Information Authentication Information Technical Data Market Research Data Other Information You Give Us 	<ul style="list-style-type: none"> Directly from you Automated / Computer Logs 	<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> HMPPS OFSTED CRC Community Resettlement Companies
Prep to release	<ul style="list-style-type: none"> Personal Information Sensitive Information Contact Details Professional Information Study related Information Identification Information Welfare Information Financial Information Authentication Information Technical Data Other Information You Give Us 	<ul style="list-style-type: none"> Directly from you Automated / Computer Logs 	<ul style="list-style-type: none"> Consent Contract Legal Obligation 	<ul style="list-style-type: none"> HMPPS OFSTED CRC Community Resettlement Companies Awarding Bodies

Inspirational Events & Innovations (IEI) Clients & Visitors

Purpose	Type(s) of Data <i>Described in Section 3</i>	Collection Method(s) <i>Described in Section 4</i>	Lawful Basis <i>Described in Section 5</i>	Data Shared with <i>Described in Section 6</i>
To reserve your room or event booking	<ul style="list-style-type: none"> Personal Information Contact Details Financial Information Identification Information Technical Data Market Research Data 	<ul style="list-style-type: none"> Directly from you Indirectly 	<ul style="list-style-type: none"> Contract 	<ul style="list-style-type: none"> Cloud based booking and payment system(s) providers

PRIVACY POLICY

To record information in the event of a Health & Safety incident	<ul style="list-style-type: none"> • Personal Information • Sensitive Information • Contact Details • Professional Information • Identification Information • Welfare Information • Authentication Information • Technical Data • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss adjusters • Legal reps • Medical Professionals • Health & Safety Executive • Environmental Health
To help ensure the security of individuals and property including the use of CCTV	<ul style="list-style-type: none"> • Personal Information • Contact Details • Identification Information • Technical Data 	<ul style="list-style-type: none"> • Directly • Indirectly • Automated / Computer Logs 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest 	<ul style="list-style-type: none"> • Security Consultant • Police Authority • Insurance / Loss adjusters • Legal reps
To improve our services	<ul style="list-style-type: none"> • Personal Information • Other Information You Give Us 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Consent 	
To provide you with information regarding our services and offers	<ul style="list-style-type: none"> • Personal Information • Contact Details 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Consent 	<ul style="list-style-type: none"> • Online email management system
To keep you informed of services, events and promotions	<ul style="list-style-type: none"> • Personal Information • Contact Details • Professional Information 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • Consent 	<ul style="list-style-type: none"> • Online email management system
To help promote the College and its services	<ul style="list-style-type: none"> • Personal Information 	<ul style="list-style-type: none"> • Directly from you • Indirectly 	<ul style="list-style-type: none"> • Consent • Contract 	<ul style="list-style-type: none"> • College Websites • Photographer

PRIVACY POLICY

	<ul style="list-style-type: none">• Professional Information• Study related Information• Identification Information• Other Information You Give Us			<ul style="list-style-type: none">• Press• Social Media• Design Agency• Online email management system
--	---	--	--	---