

# Privacy Notice 2018-19

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## Committee Approval

<b>Committee</b>	<b>Committee Action</b>	<b>Date</b>
Course Committee		
QAEC		
SMLT	Approved	9 May 2018
Academic Committee		
Board of Directors		
	<b>Date in force</b>	<b>25 May 2018</b>

## 1. Introduction

This Privacy Notice concerns the processing of personal data of past, present and prospective students of BLOOMSBURY INSTITUTE ("you", "your"). The Privacy Notice explains how Bloomsbury Institute ("BLOOMSBURY INSTITUTE", "we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold.

BLOOMSBURY INSTITUTE is the data controller of your personal data and is subject to the General Data Protection Regulation (the "GDPR").

## 2. How we collect your data

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 BLOOMSBURY INSTITUTE;
- when you apply to study at BLOOMSBURY INSTITUTE and complete application forms via our website and/or through UCAS 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 BLOOMSBURY INSTITUTE, 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.

## 3. Categories of data 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, age, gender, and your passport number or national identity card details, country of domicile and your nationality;
- 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 course 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 provision of appropriate pastoral care;
- information concerning your health and medical conditions;
- information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation;
- financial information related to tuition fees and other financial charges such as course fees, scholarships (if applicable), payments made and outstanding debt.

## 4. How we use your data

The purposes for which BLOOMSBURY INSTITUTE uses your personal data include:

- processing your application, which may include, for example, seeking confirmation from other institutions of any entry qualifications that you have declared;
- enrolling you as a student and maintaining your student record;
- administering your course and academic progress;
- administering the financial aspects of your studies, including tuition and other financial charges (e.g. library fines);
- providing or offering facilities and services to you during your time as a student and thereafter as part of BLOOMSBURY INSTITUTE's legitimate business, including pastoral care;
- share limited data with the BLOOMSBURY INSTITUTE Student Guild (an independent body that represents the voice of our student population), in order for you to become a member of the Guild and take part in all the services they provide [you have the right to opt out of becoming a member of the Guild];
- submitting reports and statistics to government organisations and/or third parties, which we are legally required to do. These include but are not limited to:
  - the Higher Education Statistics Agency (HESA) (see Section 5 below for more information)
  - National Student Survey (NSS)
  - Graduate Outcomes (former DLHE)
- monitoring equal opportunities;
- safeguarding and promoting the welfare of students;
- offering alumni services;
- if you are an overseas student, we may from time to time disclose relevant parts of your personal information to organisations outside the European Union ("EU"), for example where legislation requires us to make a disclosure. Before we release your personal information to a country outside the EU, we will ensure that such country has in place adequate legal protection for the privacy of your personal information.
- if you are an overseas student holding a student visa, we will maintain records of enrolment and will notify the UK Visas and Immigration (UKVI), as required, of your enrolment status.

**N.B.** In GDPR terms there are mainly two reasons an organisation can process data, either on a lawful basis or by seeking consent from the data subject. The vast majority of the data BLOOMSBURY INSTITUTE collects is on a lawful basis, in order to be able to provide you with the service you expect at the same time as complying with UK and EU laws and regulations. Therefore, if you were to object, we would not be able to enrol you as a student.

## 5. Sharing of your data

Except for sharing your data with the third parties mentioned in Section 4 above we will never share any of your data with any other third parties where it is not necessary to do so for the reasons mentioned above or without asking for your explicit consent prior to the distribution of the information. Furthermore, we will never sell your data to any related and/or third parties.

## 6. Data submission to the Higher Education Statistics Agency (HESA)

In order to fulfil the obligations set by the Department for Education (DfE), and to comply with specific course designation criteria, we are required to provide personal data about you to HESA. This is a legal requirement and we will therefore not seek your permission to disclose data about you to HESA. HESA publishes a Student Collection Notice. We comply fully with this Student Collection Notice. The Notice is regularly reviewed. The most up to date version is available at:

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>

Minor updates to the HESA Student Collection Notice may be made at any time. Major updates will be made no more than once per year.

If you would like a copy of the Student Collection Notice please contact our Data Controller at:

[dpo@bil.ac.uk](mailto:dpo@bil.ac.uk)

## 7. Attendance Monitoring

Students enrolling on a course at Bloomsbury Institute must agree to have their attendance and engagement monitored, and for the data to be used for intervention and reporting purposes (including reporting to external agencies). We monitor a student's attendance and engagement because we have a duty of care as a responsible institution to follow up promptly on matters of non-attendance and non-engagement so that students can be supported and given every opportunity to succeed. In addition, we are obliged to comply with the requirements of the UK Visas and Immigration, the Student Loans Company and other external agencies which require the monitoring and reporting of student attendance and engagement. Attendance and engagement involves not only attendance at timetabled classes, but also, *inter alia*, responding to our interventions, accessing our Virtual Learning Environment (Canvas) and eBooks, submitting assignments, and sitting examinations.

More information can be found in our Attendance Policy available at:

<https://www.bil.ac.uk/quality-enhancement-manual/the-uk-quality-code-for-higher-education/policies/>

## 8. How long we keep your information

Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after you have completed your course with us. However, some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes. The information that will be kept indefinitely includes:

- Your name;
- Your student ID;
- Your grades;
- Your financial history.

## 9. Your rights

According to the GDPR, which comes into force 25 May 2018, you will have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress (if it is not lawfully needed to provide the service);
- to require us not to send you marketing communications;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data (if it is not lawfully needed to provide the service);
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

**N.B.** Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Data Protection Officer using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

## 10. Contact us

If you have any queries about this Privacy Notice or how we process your personal data or to request access to the personal data we hold about you, you can contact our Data Protection Officer by email, telephone or by post:

Email: [registry@bil.ac.uk](mailto:registry@bil.ac.uk)

Telephone: +44 (0) 20 7078 8840

Post: Data Protection Officer, Bloomsbury Institute, 7 Bedford Square, London WC1B 3RA.