

Privacy Notice

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This Privacy Notice will be reviewed annually by our Senior Management and Leadership Team. A review may also be carried out if there are changes to any legislative requirements. Any amendments will be subject to approval by the Board of Directors.

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 on you.

Personal data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information.

All our degrees are validated and awarded by the University of Northampton, therefore for the purposes of processing for activities such as admissions, academic performance, decisions regarding progression and awards, relevant data is shared with the University of Northampton. Further details of the use of data are highlighted in Section 4 of this document.

Bloomsbury Institute is the Data Controller of your personal data and is subject to the United Kingdom -General Data Protection Regulation (the "UK GDPR") and Data Protection Act 2018.

Bloomsbury Institute is registered with the Information Commissioner's Officer (ICO). Our registration number is Z1082474. Further details of how we handle data and the relevant complaints process with regards to data protection is outlined in our [Data Protection Policy](#)¹.

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 initial 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 and visa compliance 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
- as you interact with us during your time as a student of Bloomsbury Institute, for the various purposes set out below
- from your answers to any online and paper survey forms and questionnaires we ask you to complete.
- from third parties, for example from your previous or current school, sixth form college, university, Student Loans Company (SLC) 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 and sensitive personal data about you.

Personal data includes, but is not limited to, the following:

¹ <https://www.bil.ac.uk/qem/policies/>

- Your current and previous name(s), and contact information such as residential address, email address and contact 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/nationalities
- if you are a non-UK citizen, we will collect and record your UK immigration status and any other immigration status you may hold for any other country
- imagery including video and or audio which is recorded through use of [CCTV](#)² within our premises
- imagery including audio and video which is recorded through use of electronic platforms
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you may have attended and places where you may have worked, the courses you may have completed, dates of study and examination results. We will also keep records relating to assessments of any course work, details of any examinations taken, any predicted and actual examination grades and any other information in your student record
- information relating to your UK immigration history which we may also obtain from the UK Visas and Immigration (UKVI), as well your immigration history for any other country (if relevant)
- information relating to your return or stay in your home country (if relevant)
- 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
- financial information related to tuition fees and other financial charges such as course fees, scholarships (if applicable), payments made and outstanding debt
- financial information related to living costs and source of funds (if relevant)
- module information and academic performance
- attendance and progression
- awards
- breaches of our policies, if relevant, such as academic or other misconduct concerning College or University activities

Sensitive data is:

- information concerning your health and medical conditions
- information about your racial or ethnic origin; religion or similar beliefs
- information about your sexual orientation

We also process contact and educational details after you stop being a student with us.

² <https://www.bil.ac.uk/qem/policies/>

4. How and why we use your data

Data collected will be held securely in your electronic student file and/or hardcopy file, where relevant, and access is controlled. Only staff who have an operational requirement to access this information will be able to do so. The purposes for which Bloomsbury Institute, and where relevant, University of Northampton, use your data include:

- processing your application, which may include, for example, seeking confirmation from other institutions and other relevant bodies of any entry qualifications that you have declared
- enrolling you as a student and maintaining your student record
- recording your academic progress
- processing survey results to give participants a voice as well as improve the quality of our services, performance and teaching, to name just a few. Please note if you do not wish to have any of your data or information processed, you are free to opt out of completing any surveys
- obtaining your UK immigration records from the UKVI (if relevant) necessary for the performance of tasks we carry out in the public interest (e.g. teaching and research)
- administering the financial aspects of your studies, including tuition and other financial charges (e.g. library fines)
- administering travel bursary schemes for eligible new students
- 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
- sharing 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]
- sharing data with relevant internal or external auditors - for checking the integrity of our data and processes sharing data with our partners, agents, other agencies and public bodies, including our technology suppliers for example our hosting service provider
- submitting reports and statistics to government organisations and/or third parties, which is necessary to fulfil our statutory and legal obligations. This also means sharing your contact details with the relevant bodies for surveying purposes. These include but are not limited to:
 - the Higher Education Statistics Agency (HESA) (see Section 6 below for more information)
 - National Student Survey (NSS)
 - Graduate Outcomes Survey
 - Office for Students (OfS)
 - Home Office, UKVI. Relevant international student's records will be maintained throughout a student's period of study and 1 year after completion UKVI will be notified of any breaches of, non-compliance with the UKVI regulations.
- monitoring equal opportunities

- safeguarding and promoting the welfare of students
- offering alumni services

In other instances, for example, 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 a country does not have in place adequate legal protection for the privacy of your personal information, we will put in place appropriate safeguards to cover this e.g. contractual clauses.

If you are an overseas student holding a student visa, we will maintain records of any visa refusal notices, enrolment and early course completion records and will notify the UKVI, as required, of the same, including ongoing engagement.

N.B. Under UK GDPR an organisation can process data, either on a lawful basis or by seeking consent from the data subject. Any data Bloomsbury Institute collects is on a legal basis and other sets are for processing for specific purposes, 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

The information shared and the manner of disclosure will be in accordance with the provisions of the Data Protection Act 2018 and UK GDPR. More details on how we handle data are covered in our [Data Protection Policy](#)³ and our [Confidentiality Policy](#)⁴. These can be accessed by following the link in Section 7 below.

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 also 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 Office for Students, 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. It is your responsibility to keep up to date with the updates.

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

dpo@bil.ac.uk

³ <https://www.bil.ac.uk/qem/policies/>

⁴ <https://www.bil.ac.uk/qem/policies/>

7. How we keep your data secure

Bloomsbury Institute has internal policies, which include our Data Protection Policy, Confidentiality Policy, our document retention schedules in our Student Records Policy, and controls are in place to prevent unauthorised access or disclosure, any changes to or destruction of data and to ensure that data is not misused and is not accessed except by employees in the performance of their duties. The third parties we share your information with are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Relevant policies can be found [here](#)⁵

8. Engagement 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 UKVI, 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 Engagement Policy which can be accessed by following the link in section 7 above.

9. 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 and respond to any enquiries. The information that may be kept indefinitely includes:

- Your name
- Date of birth
- Your student ID
- Your grades and achievement during your studies with us
- Your financial history with us
- Your immigration history

10. Your rights

Under the UK GDPR, you have the following rights:

- The right to be informed
- The right to subject access

⁵ <https://www.bil.ac.uk/qem/policies/>

- The right to rectification
- The right to object
- The right to erasure
- The right to portability
- The right to restrict processing
- The right to automated decision-making and profiling

A detailed explanation of your rights can be found in our Data Protection Policy through the link in Section 7 above.

N.B. Whilst this Privacy Policy sets out many of the key ways in which we collect and use students' data, it does not provide an exhaustive list of all the ways in which we collect and use personal data and this is regularly reviewed. Please also 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 in Section 11. 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.

11. 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: dpo@bil.ac.uk

Telephone: +44 (0) 20 7078 8840

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