

Student Privacy Notice (Addendum 1)

We understand that privacy and the security of your personal information is extremely important.

This statement sets out what we do with your information and what we do to keep it secure. It also explains where and how we collect your personal information, as well as your rights over the personal information we hold about you.

This notice applies to prospective, past and current students at The Bedford College Group (registered Bedford College), which includes the brands Bedford College, National College for Motorsport, Shuttleworth College, The Bedford Sixth Form and Tresham College. It also includes any other brands we add to this group in the future.

This document refers to the UK General Data Protection Regulation (GDPR) and any future legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection in the UK. This includes any replacement legislation coming into effect from time to time.

1. What sort of information do we collect?

We collect a variety of personal data and special category data.

- **Personal information** data includes information such as: contact information, such as your name, username, address, email address and phone numbers; your date of birth and national identifiers (such as your National Insurance number or passport number), information about your employment.
- **Special category information** includes information such as: information about your physical or mental health, including genetic information or biometric information, information about your race, ethnic origin and religion

Further information on how, and why we process specific types of special category data can be found in our Policy on the Processing of Special Category data and Criminal Convictions located on our policies page. [Policies & Procedures | The Bedford College Group | Further & Higher Education](#)

We collect the following information about you:

- a) Information about you including:
- Personal details about yourself including your name, date of birth, unique learner number and national insurance number
 - Contact details including address, telephone number and email address
 - Details of your previous qualifications, employment and educational history
 - Information about your nationality and residency, and previous address if applicable

- Information about medical or health conditions, including whether or not you have a learning disability or difficulty, ethnicity
- Household information (this is collected only for the Education and Skills Funding Agency (ESFA) and is not used by the College)
- Free school meals eligibility
- Attendance marks such as sessions attended, number of absences and absence reasons
- Information to monitor and report on student discipline and progress and support your learning
- Your destination after College.
- Your postcode for the provision of mapping geographical demographic information.

- b) We collect data about criminal convictions.
- c) We collect your sexual orientation, gender identity and religion.
- d) We collect parent/carer/emergency contacts. For those over age 18 at the start of the academic year, the information is optional.
- e) We collect your bank details if you need to pay for your course or you are in receipt of a bursary. If you pay for a course online, your card information is not held by us. It is collected by our third-party payment processors who specialise in the secure online capture and processing of credit/debit card transactions.
- f) We collect the name of your last school.
- g) We collect your consent to keep in touch with you about our products and services, future events and College news, and to take photography and record audio and video content to showcase the College to prospective students and the community.
- h) We take your photograph to display on your College ID card
- i) We may capture your image on our CCTV systems
- j) We monitor your internet browsing.
- k) We collect details such as free meals entitlement and a range of household income values
- l) Test results from COVID tests (if needed)

2. **How do we collect information from you?**

Most of the information above is collected directly from you via online forms on our websites, application forms, enrolment forms, in person, over the telephone or face-to-face. However, some information such as previous qualifications, or special needs, may be collected from other organisations such as the Department of Education (DfE), the Local Education Authority, or your previous school.

3. **Why do we collect your information?**

The Bedford College Group needs to collect and process data so we can provide you with the highest standards of service we are able to give, and to meet its legal obligations from government organisations such as the DfE and Office for Students (OfS)

More specifically, we collect the following data for the following reasons:

How we use your information	Legal (Lawful) Basis
Information about you (See section 1a above)	<p>In order to meet our legal obligations with the Education & Skills Funding Agency (ESFA), Office for Students (OfS)/Higher Education Statistics Agency (HESA part of JISC https://www.hesa.ac.uk/about/regulation/data-protection/notices). They are also necessary in order for us to carry out our public task to provide education and training.</p> <p>With regards, to your email address, to support you (i.e. your legitimate interest), we will share this with awarding bodies (if able to) to enable you to receive an e-certificates from them. This will facilitate timely receipt of your results.</p>
Criminal Convictions	As a part of our Public Task in order to carry out our duty to safeguard our staff and students.
Information regarding your Sexual orientation, gender identity and religion	<p>As part of our Public Task to ensure that you are not discriminated against in any way</p> <p>You do however have the option not to provide this information (by using the prefer not to say option)</p>
Parent/Carer/Emergency Contacts	<p>We collect these so that we can communicate with them if it is in your vital interest</p> <p>For under 18-year olds, we collect these as part of our public task in order to support your education and learning as fully as possible</p>
Bank details (if you need to pay for your course or you are in receipt of bursary)	We collect this so that we can fulfil our contract with you. If you pay for a course online, your card information is not held by us. It is collected by our third-party payment processors who specialise in the secure online capture and processing of credit/debit card transactions

The name of your last school	As part of our Legitimate Interests so that we can monitor progression from our feeder schools
Your consent	<p>To keep in touch with you about our products and services, future events and College news, and to take photography and record audio and video content to showcase the College to prospective students and the community</p> <p>Consent can be withdrawn at any time, where the organisation is relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.</p>
Take your Photograph to display on your college ID card	As part of our legitimate interests to ensure the safety of all our students and provide you access to our facilities.
Capture your image on CCTV	As part of our legitimate interest to ensure the safety of our students, staff and visitors, and the protection of our buildings and assets
Monitor your internet browsing	As part of our legitimate interests to ensure the safety of our students.
We collect details such as free meals entitlement and a range of household income values (e.g. Employment status and benefits)	As part of our legitimate interest to assess entitlement to fee discounts, support or access to student / higher education bursary
Potential test results (for Covid. E.g. Lateral flow test results)	As part of our public task to protect students and staff
Your health data	In order to support the vital interests of our students and staff.

4. How do we use your information?

We are committed to being transparent about what we collect, how we use your data and meeting our data protection obligations

We collect and process your personal data to:

- Meet our statutory obligations as a Further Education (FE) College
- Process application or enrolment forms you've submitted for a course, study programme or apprenticeship programme
- Access catering facilities and provide free school meals using our cashless catering system Way2Pay
- Support your University application using online tools such as Unifrog
- Effectively manage your learning, including monitoring and reporting on your progress, providing pastoral care, registering with awarding bodies (so that they can provide your certification) , and administering learning loans
- Seek your views, comments and feedback on our products and services, and notify you of changes
- Send you communication which you have requested and that may be of interest on our products, services, news and events
- Conduct market research, either ourselves or through reputable agencies
- Support statistical and demographic analysis
- Ensure the safety of our students, staff and visitors, and the protection of our buildings and assets.

Where the organisation processes other special categories of personal data, such as information about ethnic origin, age, gender, disability or health, this is done for the purposes of equal opportunities monitoring and monitor our service provision to improve our services to specific groups. We also use the data so we can personalise the provision to each student to provide them with the best possible opportunities to succeed.

5. What if I do not provide the personal information you require?

If you do not provide the data required to meet legal obligations, we will not be able to enrol you as a student.

If you do not provide the other information we request, for example whether you have a learning difficulty or disability, it may result in us being unable to provide the high standard of service we would wish to deliver.

6. Where do we store your personal information?

Your personal information is stored securely in a range of different places, including student information and recruitment management systems, on electronic documents within a secure network and on paper, stored in secure places and with restricted access by only those authorised.

7. Who has access to your personal information?

7(a) Sharing data within the Bedford Group (Internally)

Your information may be shared internally, including with any staff from The Bedford College Group who need the data to provide services to students. This will include special categories of data where appropriate.

7(b) Sharing Data with Third Parties

The College will only share your data with third parties where there is a legal basis to do so. These third parties include the Department of Education (DfE) / ESFA, OfS, Learner Records Service (LRS), the Higher Education Statistics Agency (HESA), awarding and examination bodies, Student Loans Company (SLC) and local

authorities, where there is a legal basis to do so.

Where the Group receives a request from an appropriate body we may share your personal data for law enforcement purposes, i.e. for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.

From time to time, we engage non-statutory third parties to process personal data on our behalf, for example to follow up course applications during busy periods or undertake research. Where this happens, we require these parties to do so on the basis of written instructions, under a duty of confidentiality and an obligation to implement appropriate technical and organisational measures to ensure the security of data, and never to use it for their own direct marketing purposes. We will only disclose personal information that is necessary to carry out the task or provide the service to you on our behalf.

7(b)(i) Data used by / shared with the Department for Education (DfE) including the Education and Skills Funding Agency (ESFA)

For the purposes of relevant data protection legislation, the DfE is the data controller for personal data processed by Education and Skills Funding Agency (ESFA).

Your personal information in your Individualised Learner Record (ILR) is used by the DfE to exercise its functions under article 6(1) (e) of the UK GDPR and to meet our statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009.

The ILR collects data about learners and learning undertaken. We must collect and return the data to the ESFA each year under the terms of a funding agreement, contract or grant agreement. This helps ensure that public money distributed through the DfE/ ESFA is being spent in line with government targets. It is also used for education, training, employment, and well-being purposes, including research. We retain ILR learner data for 3 years for operational purposes and 66 years for research purposes. For more information about the ILR and the data collected, please see the ILR specification at <https://www.gov.uk/government/collections/individualised-learner-record-ilr>

For more information about how your personal data is used by the DfE and your individual rights, please see the DfE Personal Information Charter (<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>) and the “Privacy Notice for key stage 5 and adult education “issued by DfE issued by DfE (<https://www.gov.uk/government/publications/esfa-privacy-notice>).

For more information about how HESA use personal data then please access <https://www.hesa.ac.uk/about/website/privacy> .

7(b) (ii) Data used by shared with the Learning Records Service (LRS)

The information you supply will be used by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE), to issue you with a Unique Learner Number (ULN), and to create your Personal Learning Record. For more information about how your information is processed and shared refer to the Privacy Notice available on gov.uk [LRS: privacy notice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/lrs-privacy-notice)

7(b)(iii) Data shared with the Higher Education Statistics Agency (HESA)

Personal data is shared with the Higher Education Statistics Agency (HESA), part of Jisc, for the purposes of conducting the Graduate Outcomes survey, which is a UK-wide survey capturing information about the activities and perspectives of graduates 15 months after they finish their studies. All eligible graduates who complete a higher education course are asked to take part in the survey, in order to help current and future students gain an insight into career destinations and development.

More information about how Jisc processes your data can be found in the [Graduate Outcomes Privacy Information](#).

8. International Transfers

From time to time we may transfer your personal information to our service providers based outside of the UK for the purposes described in this Privacy Policy. If we do this your personal information will continue to be subject to one or more appropriate safeguards set out in the law. These might be the use of model contracts in a form approved by regulators, or having our suppliers sign up to an independent privacy scheme approved by regulators.

9. How do we protect your personal information?

The organisation takes the security of your personal information very seriously. We have policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Our Data Protection Policy is available to view on our website via the following link: [Policies & Procedures | The Bedford College Group | Further & Higher Education](#).

We have procedures and policies in place to ensure we do our best to protect your personal data. This includes reporting of near miss events so that we continually improve procedures.

If a breach is likely to result in high risk to rights and freedoms of individuals the Group has a lawful duty to inform them without undue delay. And we are legally obligated to notify the ICO within 72 hours.

If you suspect a breach please contact the Data Protection Officer using the details in the contact section below.

10. How long do we keep hold of your information?

We review our retention periods for personal information on a regular basis. We are

legally required to hold some types of information to fulfil our statutory obligations, for example all personal data collected and processed on behalf of the ESFA or OfS is held for as long as we are legally required to do so, currently until at least 2030. Other data will be held as long as is necessary to fulfil our duty as a college and/or to undertake relevant activity. See our Retention Policy via the following link [Policies & Procedures | The Bedford College Group | Further & Higher Education](#)

11. Keeping you informed

From time to time, we would like to tell you about our products and services, events and College news we think you might be interested in. We will do this by post and, where you have consented to us doing so, we may also do this by email, text message or telephone. We will not send you marketing messages if you have not indicated to. As a student, and where you have consented to us doing so, we may also take photographs, audio and video of your time here to showcase the College to prospective students and the community.

You can change your marketing preferences at any time by contacting us as set by using the contact details outlined in to Contact us section below.

12. Websites and social media

Our websites contain links to other websites. This Privacy Statement only applies to our official College websites so when you link to other websites you should read their own privacy statements.

When using one of our websites, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like' or 'share' a new story. When doing this, your personal information may be visible to the providers of those social networks, their other users and/or The Bedford College Group. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

You can engage with us on social media through one of our official social media pages. To participate in these you will need to like our page and can opt-out at any time.

13. Your rights

Unless subject to an exemption under the data processing regulations, you have the following rights with respect to your personal data.

- **The right to be informed:** You have the right to be informed. We will inform you of the reason for processing your data, when we first contact you.
- **The right of access:** You have the right to access the personal information that we hold about you in many circumstances. This is sometimes called a 'Subject Access Request'. There is a form located via the following link to assist this. [Data Protection: Subject Access Request Form – The Bedford College Group \(collegeworkflows.co.uk\)](#)

We are committed to providing the information you request as part of your Subject Access Request and have procedures in place to ensure this occurs in a timely fashion. We **do not** have agreements in place with any third-party platforms that offer "Subject Access Requests as a Service". As a responsible data controller of your personal information, this represents significant risks when sharing data. The right of access afforded to you, does not obligate data controllers to share data with 3rd parties. It is our policy to provide the information directly to data subjects ensuring the safety and security of the information throughout the process

- **The right to rectification:** If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.
- **The right to object:** You have the right to object to the processing of your personal data where we are relying on a Legitimate Interest and there is something about your particular situation, which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. Please refer to section 3 for the lawful basis under which we process your data and section 10 for how long we retain your information.
- **The Right to Erasure:** This enables you to ask the organisation to delete or stop processing your data, for example where the data is no longer necessary for the stated purposes of processing and where the organisation is relying on consent or its legitimate interests as the legal ground for processing. Note, however, that we may not always be able to comply with your erasure request for specific legal reasons. Please refer to section 3, for the lawful basis under which we process your data and section 10 for how long we retain your information.
- **The Right to restrict processing:** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (i) if our use of the data is unlawful but you do not want us to erase it,
 - (ii) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it,
 - (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Please refer to section 3 for the lawful basis under which we process your data.

- **The Right to Data Portability** (request to transfer): We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right may only apply to automated information which you initially provided consent for the organisation to use or where the organisation used the information to perform a contract with you.
- **The Right to object to automated decision making.**
You have the right to object to any decision made by solely automated means. You can ask for human intervention on any decision, to express the Group's point of

view and to obtain an explanation of the Group's decision. You also have the right to challenge the decision.

Where possible we will seek to comply with your request but we may be required to hold, retain or process information to comply with a legal obligation or as a public task.

- **If you would like to exercise any of these rights, please contact us using the details in the contact (section 15)**

Please Note: We will need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect your personal information against fraudulent requests.

We will monitor future guidance from the Information Commissioner's Office but currently undertake our own reasonable measures to verify the identity of data subjects. We would like to assure you that the protection of your data is our main concern and we are committed to providing information as part of any valid request.

For more information on your rights, please refer to the website of the Information Commissioner's Office (ICO).

14. **Changes to this Policy**

We may occasionally make changes to the Policy, in particular when there are significant changes in related legislation or in Group's strategy. When this happens we will place an updated version on the Group's website and the date this has been amended.

15. **Contact us**

If you would like to:

- Exercise one of your rights as set out above or
- Have a question regarding how your personal information is being processed

Please contact us using one of the methods below:

Email	Mydata@bedford.ac.uk
Post	Data Protection Officer, The Bedford College Group, Tresham College; Windmill Avenue, Kettering; NN15 6ER

Should this still not be resolved, you have the right to complain to the supervisory authority – the Information Commissioner's Office (ICO). Contact details for the ICO

can be found on www.ico.org.uk

- If you wish to raise a concern regarding a **data breach** please contact:

By Email: Dataprotection@bedford.ac.uk

To read our full Privacy Policy, please visit [Privacy Policy | The Bedford College Group
| Policies](#)