

Privacy notice for current, former and prospective students

1: Introduction

Here at The City College we are committed to respecting and protecting your privacy and personal information. ‘Personal information’ means any information which relates to or identifies you as an individual.

The City College (TCC) is a trading name of Inter-Ed UK Ltd. Inter-Ed UK Ltd is a data controller in terms of the Data Protection Act 1998 and the General Data Protection Regulations (GDPR) which comes into effect on the 25th May 2018. Inter-Ed UK Ltd is registered with the Information Commissioners Office (ICO) with the registration number Z2115272.

TCC is a college of Higher Education based in the UK that delivers a range of programmes to UK and EU students. This privacy notice explains how TCC collects, uses, and shares your personal data, and your rights in relation to your personal data that TCC holds. This privacy notice concerns TCC’s processing of personal data for its current, former and prospective students.

2: How does The City College collect your information?

Information about you will be collected by TCC in a number of ways:

- When you apply or register to study at TCC we will collect data to allow us to administer your studies, including through your application form. If you have applied through an agent they will share your information with us
- If you express an interest in TCC we will ask you to provide us with some information so we can communicate with you effectively
- In various other ways during the course of your studies, for example, when you interact with TCC administration department
- TCC may, at times, ask third parties for information about you, such as your previous place of learning or an employer.

3: What type of information does The City College collect?

TCC 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 and your passport number, country of domicile and nationality, and emergency contact details
- Information relating to your education and employment history, including where you have studied and your examination results, and where you have worked
- Information relating to assessment of your work, details of assignments, meetings with tutors and other staff, attendance records, and other information in your student record
- Sensitive personal data or special category data, including information required by Higher Education Statistics Agency, for example:
 - Disability
 - Ethnicity
 - Gender Identity
 - Religion or belief
 - Sexual orientation.

4: How does The City College use your information?

TCC will process your personal information for a range of contractual, statutory or public interest purposes, including the following to:

- deliver and administer your education, record the details of your studies (including any work experience with external organisations), and determine/ confirm your academic achievements (eg. results, prizes)
- administer the financial aspects of your relationship with us and any funders, including the Student Loans Company
- deliver facilities to you (eg. IT, libraries, careers)
- provide student support services (eg. council tax reduction eligibility, opening a bank account, discount travel card eligibility, employability opportunities and use of the National Careers Service, or providing learning support)
- carry out legal duties, providing information to others (eg. local councils, Transport for London, or the Student Loans Company)
- enable your participation at events (eg. functions, 'graduation')
- communicate effectively with you by post, email, phone, and other electronic media, including the distribution of any relevant newsletters and circulars
- operate security (including CCTV), governance, disciplinary (including academic misconduct), complaint, audit and quality assurance processes and arrangements
- support your training, medical, safety, welfare and religious requirements as appropriate
- compile statistics and conduct research for internal and statutory reporting purposes
- fulfil and monitor our responsibilities under equalities, immigration and public safety legislation
- provide other activities within TCC's business, including developing and maintaining our relationship with former students
- enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us).

5: What is the legal basis for processing your information?

The legal basis for processing your data is necessary for:

- Article 6 (1)(b): the performance of our contractual obligations with you (eg. to manage your student experience and welfare while studying)
- Article 6 (1)(c): compliance with legal obligations (eg. providing your information to Higher Education Statistics Agency)
- Article 6 (1)(d): the purpose of protecting the vital interest of yourself or another (eg. in a medical emergency)
- Article 6 (1)(f): the pursuit of the legitimate interests of the college or an external organisation (eg. contact with former students or to enable your access to external services such as discounted travel from Transport for London) unless there is a good reason to protect your personal data which overrides those legitimate interests
- Article 9(2)(j): processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the

aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject [NB. Article 9(2)(j) relates specifically to the sensitive personal data or special category data that is collected and processed – see section 3 above].

The City College does not share your information with any third party beyond the legitimate purposes referred to in this section. If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw this at any time.

6: With whom might The City College share your information?

Where necessary, TCC might share relevant items of your personal data with those outside the institution as set out below:

- The Higher Education Statistics Agency (see HESA's statement about the uses made by them of your personal information published at:
<https://www.hesa.ac.uk/about/regulation/data-protection/notices>)
- Your funders and/ or sponsors (eg. the Student Loans Company - this does not include third parties who may be paying for your studies but with whom no formal contract exists)
- Awarding Bodies that validate the qualifications studied, including External Examiners, Standards Verifiers, Academic Management Reviewers, and Test Inspectors
- Professional bodies (e.g. Health and Care Professions Council or the Nursing and Midwifery Council) for the purposes of confirming your qualifications and the accreditation of your course
- Work experience providers or other educational partners involved where this is necessary for the purposes of your study
- Relevant Government Departments (eg. Department for Education, Home Office, Foreign and Commonwealth Office, Department of Health)
- Relevant executive agencies or non-departmental public bodies (eg. UK Visas and Immigration, HM Revenue and Customs, the Health and Safety Executive)
- Relevant Higher Education bodies (eg. The Office for Students (OfS), the Office of the Independent Adjudicator (OIS), the Quality Assurance Agency (QAA), and the National Student Survey)
- Potential employers or providers of education whom you have approached for the purposes of confirming your qualifications or providing a reference
- Local authorities, (eg. when validating your eligibility for Council Tax reduction)
- Transport for London for the purpose of validating your eligibility for discounted travel costs
- UK Agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, collection of a tax or duty, or safeguarding national security. This may include, for example, Benefit or Tax Inspectors, the Police, or UK Visas and Immigration (UKVI), as necessary, and with consideration of your rights and freedoms
- TCC also employs the services of various suppliers and agents as data processors. In each case your information will only be shared with these third parties in accordance with the data protection principles.

7: Data retention

TCC retains personal information it collects from you where there is an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When there is no ongoing legitimate business need to process your personal information, TCC will either delete or anonymise it.

Records are generally kept for a period of six years before being deleted or anonymised. However, some identifiable records (e.g. core records about when a student studied or the qualification achieved) justifiably need to be retained in the very long-term for 'active' purposes (e.g. the provision of references).

8: Your rights in relation to the data The City College holds about you

You have rights to your personal data held by TCC as set out in the GDPR. These include:

- Rights to access your personal data to be provided by TCC within one calendar month. This is known as a Subject Access Request (Article 15) and details include:
 - A description of your data
 - The Recipients of your data
 - A copy of your data
- Rights to rectification and erasure. You have the right to correct any inaccurate personal data held by TCC. Once information TCC has collected is no longer necessary for the purpose for which it was collected and processed, you sometimes have the right to have your data erased
- Rights to restriction of processing:
 - You sometimes have the right to restrict the processing of your personal data or object to the processing of your data
 - If you wish to withdraw consent for the processing of your personal data or otherwise restrict or object to the processing of your personal data, please contact the college Principal
- Rights to data portability. You have the right to receive the personal data TCC holds about you in a structured, commonly used and machine-readable format, and have the right to transmit that data to another controller without hindrance from TCC.

9: Will this privacy notice be changed?

TCC reserves the right to amend this privacy notice from time-to-time if deemed necessary, for example to remain compliant with UK law. If this happens, TCC will post notice of the change on its website and you will be deemed to have accepted such changes.

TCC encourages you to periodically review this notice to be informed of how the institution is protecting your privacy.

10: Who is The City College's Data Protection Officer?

TCC's Data Protection Officer (DPO) is the Principal. Should you have any concerns about your personal data held by TCC, please contact the DPO by email using privacy@citycollege.ac.uk