

All Nations Christian College

Enquirers and Applicants' Privacy Notice

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2. Introduction

We are pleased that you are considering becoming a student at All Nations Christian College. The College needs to collect and process personal data in order to answer enquiries, process applications, provide services, manage its operations effectively and meet legal requirements. The College is committed to protecting your privacy and to meeting our data protection obligations. This privacy notice is intended to give you an understanding of how and why we use the information you provide to us via our website and other means.

3. Related Documents

- Data Protection Policy
- Data Retention Schedule
- Website Privacy Notice
- Cookie Policy
- Student Privacy Notice Summary
- Student Privacy Notice
- Student Terms and Conditions
- Student Agreement
- Supporters and Alumni Privacy Notice
- External Library Users Privacy Notice

4. Scope

- 4.1 This document applies to you if you have made any enquiries (via our website, telephone, postal, email or enquiry through any other means) about studying at All Nations Christian College or if you have begun/ completed and/or submitted an application form for studying on any course or programme of study at the College.

- 4.2 If you have registered or enrolled to study at the College please see the Student Privacy Notice.

5. Who we are

All Nations Christian College is the **data controller** in relation to the processing activities described below. This means that the College decides why and how your personal information is processed. Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it is referring to All Nations Christian College.

6. What information do we collect about you and how do we collect it?

Information that you give to us:

- 6.1 As soon as you contact us, or speak with an adviser either via phone or at an Enquirers' or Taste & See Day, or at a stall run by the College at an external event run by a third party, we create a record in your name.
- 6.2 Information supplied on any application form you start to complete/complete/and/or submit will be added to a Student Record as part of the application process. This includes other application documentation, such as transcripts, visas, English eligibility documentation and references.
- 6.3 As part of your application you may give us information about “special categories” of data, including your racial or ethnic origin, religious beliefs, physical or mental health, sexual orientation or criminal background
- 6.4 We keep records of your participation in Enquirers' or Taste & See Days, and your use of other services we offer, e.g. accommodation, payments made to the College etc.
- 6.5 If you attend an Enquirers' or Taste & See Day we retain the Enquirer's registration you complete that day. This contains name and contact details, sex, date of birth, nationality, marital status, previous qualifications, previous mission experience, how you heard about us, the study of programmes and modules you are interested in and when you might join us. We will give you the opportunity to be added to our database which helps us when you contact us in the future.
- 6.6 You may provide us with your mailing preferences if you elect to go subscribe to any of our mailings.

Information that we automatically collect:

- 6.7 We may automatically collect technical information when you browse our websites. Further information about this is given in our Cookies Policy.
- 6.8 If you receive email marketing communications, we record if you open them.

Information we receive from third parties:

- 6.9 We may receive references from those you have chosen as referees.
- 6.10 We may receive information provided by medical assessments from third parties e.g. needs assessments for Disabled Students' Allowances (DSA)s, if you have given permission for us to receive this information.
- 6.11 We may receive information from the Disclosure and Barring Service as part of our safeguarding checks.
- 6.12 We may enhance our records with data received from third parties, in order to ensure we

have up to date contact details for you, and in order to offer you more relevant communications. We will only send you marketing communications if your communications preferences allow this.

7. How do we use your personal information?

Where the activity relates to our public task of delivering Higher Education qualifications and promoting the educational wellbeing of the community

- 7.1 We will use and process your personal information to respond to your requests and enquiries and to provide you with our services and or information about them and our activities.
- 7.2 We will use and process all the information we receive as part of your formal application for a study place to facilitate your application and to determine whether you meet the admissions criteria, as set out in the College Admissions Policy, and to facilitate our response to your application.
- 7.3 If you do not provide some of the information we need, we may not be able to either service your request or effectively determine whether you are eligible to be offered a place on a programme of study.
- 7.4 Information that you give us about any disabilities and special requirements you have will also be used for the purpose for which it was provided.
- 7.5 We use your “special categories” of data for activities including: equal opportunities monitoring, identifying if you need support, providing you with relevant opportunities and to complete legally required statistical returns. Criminal background information is also used to determine whether the College needs to carry out a safeguarding risk assessment and to inform us whether this will impact any visa application or ministry placement.

Where the activity is in our legitimate interests

- 7.6 Our legitimate interests are to provide and improve our services, to manage our operations efficiently and to increase our student numbers.
- 7.7 We will follow up enquirers and applicants to see if we can supply them with further information, to manage complaints and to verify the accuracy of data held about them.
- 7.8 We may contact incomplete, deferred or withdrawn applicants at a later date to confirm whether they wish to continue with their application.
- 7.9 We will also follow up enquirers and applicants to ask them if they would like to receive relevant marketing information. All such communications come with the option to change your marketing preferences including the option to no longer receive them.

8. Who do we share your information with?

- 8.1 Personal data provided when people contact the College by phone, post, email, or other digital media are stored digitally and in paper files. Internally, the data is only accessible by relevant staff on a need-to-know basis and in order for them to fulfil their roles and responsibilities.
- 8.2 **Third Parties:** We will never sell, distribute, or lease your personal information to third parties. However we may disclose your details to third-party service providers and agents for the purposes of providing services to us. All third parties are obliged to be compliant with data protection legislation. Third parties who may have access to your data include:
- **IT Support:** Our accounting software providers have an agreement with us to use the personal information we provide them only to provide, support or improve their services to us. They are obliged to never sell our subscriber lists and neither they nor their third parties (where applicable) have a direct relationship with you nor advertise their services to you.
Our external IT support are also able to access your personal data if it is stored on our network. They are only able to access this for technical support and at our request and are legally bound not to breach anyone's privacy in performing their duties.
 - **Internet facilitators:** Please note that when you browse any website, by default your computing device will also send information to us, such as your IP address and other device specific information in order to enable the website to function as it should. Similarly, when you send an **email** to us, it is transmitted from server to server as it crosses the Internet. Along the way, server administrators can read what you send and we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.
- 8.3 We may transfer your personal information to a successor body if All Nations Christian College ceases to exist.
- 8.4 We may also transfer your personal information if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights property or safety of our enquirers. However we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

9. Where do we store your personal information?

- 9.1 All Nations is committed to the data protection principles of good practice for handling information.
- 9.2 We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees and those providing technical support or services, in the proper performance of their duties. We use a secure server for computer files and encrypt all personal data held digitally. When we store paper records, they are always kept in locked cabinets or rooms which are locked when unoccupied.
- 9.3 We will only transfer data within All Nations on a 'need-to-know' basis so that we can support our academic and other services to you
- 9.4 We take every care when communicating with potential students in sensitive locations, to ensure as far as possible that we do not compromise their safety by only ever contacting them through the contact details they provide.

If for some reason we experience a breach in our security, we will fulfil our legal obligation to

inform the data protection supervisory authority, The UK Information Commissioner's Office (ICO) within 72 hours. We will inform you if there is a possibility that you might have been or you have been harmed by any breach.

10. For how long do we keep your personal information?

- 10.1 Our Data Retention Schedule gives more detailed information about data retention.
- 10.2 Data concerning your enquiry and incomplete application forms and other application documentation is deleted between 6 months and two years after it has been provided, depending on the nature of your enquiry or how far you proceeded with your application. It will be kept longer if you make this request.
- 10.3 Application records become part of your Student record if you are subsequently registered or enrolled on a programme of study and are used and stored in line with our Student Privacy Notice.
- 10.4 If Enquirers or Applicants agree to receive marketing information, this will be used and stored in line with our Supporters and Alumni Privacy Notice.

11. Do we transfer information outside the European Economic Area (EEA)?

- 11.1 All Nations will not transfer personal data outside the European Economic Area. If we are required to transfer your information outside the EEA, we will take steps to ensure that appropriate security measures are taken to protect your privacy rights as outlined in this policy. This would either be imposing contractual obligations on the recipient of your personal information, or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. For example, we would ensure that a supplier based in the USA has signed up to "Privacy Shield".

12. Automated decision-making

Applicant decisions are not based on automated decision-making.

13. What are your rights?

13.1 As a data subject, you have a number of rights. You can:

- access and obtain a copy of the information we hold about you, on request;
- require the College to change incorrect or incomplete data;
- require the College to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the College is relying on its legitimate interests as the legal ground for processing.

13.2 Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However we may continue to use the data where we have a legitimate reason for doing so.

13.3 If you believe that the College has not complied with your data protection rights, you can complain to the data protection supervisory authority, The UK Information Commissioner's Office (ICO), which who can be contacted at <https://ico.org.uk/concerns/handling>

14. How to Contact Us

14.1 If you would like to exercise any of the above rights, have any queries about this privacy notice or about the way we process your personal information, please direct any queries to our Data Protection department using the contact details below.

- Email: info@allnations.ac.uk
- Telephone: +44(0)1920 443500
- By post: Data Protection, All Nations Christian College, Easneye, Ware, Herts, SG12 8LX
- You can update your mailing preferences here:
<https://allnations.accessconsent.com/home> or by contacting: network@allnations.ac.uk

14.2 If you would like to access a copy of your data, you may find it easier to use the form you can find here: [https://www.allnations.ac.uk/sites/default/files/PDFs/Data Subject Access Request Form.pdf](https://www.allnations.ac.uk/sites/default/files/PDFs/Data%20Subject%20Access%20Request%20Form.pdf)

14.3 We will make every effort to respond to you within 7 days and within no more than 30 days.

15. Notice Review:

This notice is effective from March 2021. We will review it regularly and will update it when necessary, so please check back from time to time.

All Nations Christian College Limited is a registered charity (No. 311028) and a company limited by guarantee, registered in England (no 990054). The College is registered under the Data Protection Act 2018 (Reg. No. Z6320083). The College has a fully owned trading subsidiary: All Nations Trading Limited, a registered company (No. 1189164) VAT Reg. No. 214 7013 06. Both companies have a registered address of: Easneye, Ware, Hertfordshire, SG12 8LX.