

All Nations Christian College

Student Privacy Notice

1. Contents

1. Contents
2. Introduction
3. Related Documents
4. Scope
5. Who we are
6. What information does the College collect about you and how do we collect it?
7. How do we use your personal information?
8. Who do we share your information with?
9. How long do we keep your personal information for?
10. Student's use of personal data
11. How does the College protect data?
12. Do we transfer information outside the EEA?
13. Automated decision-making
14. What are your rights?
15. How to contact us
16. Notice Review
17. Glossary
18. Appendix 1: How do we use your personal data?
19. Appendix 2: Who do we share your personal data with?

2. Introduction

All Nations Christian College needs to collect and process personal data in order to provide services to students, 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
- Student Data Retention Schedule
- Enquirers' Privacy Notice
- Alumni Privacy Notice
- Student Privacy Notice Summary (i.e. a summary of this document)
- Student Terms and Conditions
- Student Agreement
- Website Privacy Notice
- Cookie Policy

4. Scope

- 4.1 This document applies to you if you have ever enrolled or registered to study with All Nations Christian College, including:
 - undergraduate students
 - postgraduate students
 - En Route programme students

- Short Course or Advanced Short Course students

4.2 If you have contacted All Nations but not enrolled for study, please see the Enquirers' Privacy Notice. If you have already completed your studies, please see the Alumni 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, we create a record in your name. To that record we add information that you give us when reserving, registering or enrolling and throughout your studies. We keep records of your participation in learning activities and your use of other services we offer, e.g. accommodation, use of College transport, library, Virtual Learning environment (VLE) etc.
- 6.2 We hold general information about you, such as your name, contact details, modules and qualifications studied and fee payments, as well as data relating to assessments and results.
- You may give us information about "special categories" of data, including your racial or ethnic origin, religious beliefs, physical or mental health, or sexual orientation. If you are currently or become subject to an order, restriction or arrangement imposed by a court or by an authorised body, you must make us aware immediately of any conditions which may prevent you from fully engaging with the programme of study and the wider All Nations community.

Information that we automatically collect:

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

Information we receive from third parties:

- 6.5 We may receive some information about you from third parties. We may contact the Higher Education Statistics Agency (HESA) or other educational institutions to confirm the qualifications you have obtained or to check whether you have been included in a previous HESA or Individual Learner Record (ILR) return.

We also receive some personal information from HESA as part of the process of reporting to HESA according to our legal obligation.

- 6.6 If you receive funding from a UK funding authority or government agency, such as a loan or grant, we will receive basic information from the funding provider. If your fees are paid by another organisation, they may provide some information about you to us.
- 6.7 Information provided in medical assessments from third parties e.g. needs assessments for Disabled Students' Allowances (DSA).

- 6.8 If you are not currently studying, 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.
- 6.9 If you book your course via Event Brite, we may offer you the option of receiving marketing communications in future when we contact you in one follow-up email after the course has finished.

7. How do we use your personal information?

- 7.1 We process your data as part of fulfilling our public task of delivering Higher Education qualifications and promoting the educational wellbeing of the community.
- 7.2 We collect and process a broad range of personal data about you in order to deliver our services and support you, to manage our operations effectively, and to meet our legal requirements.
- 7.3 If you do not provide some of the information we need at registration, enrolment and during the course of your studies, we may not be able to effectively provide administration or support services to enable you to succeed in your studies.
- 7.4 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.
- 7.5 Information that you have given us about any disabilities and special requirements you have will also be used to inform the provision of reasonable adjustments and other provisions for your study.
- 7.6 You may submit additional “special category” information to us, for example medical information to support your wellbeing, medical evidence for funding or information pertinent to an enquiry or complaint. We only use this information for the purpose for which it was provided.
- 7.7 Detailed information on the purposes we use your information for is provided in Appendix 1.

8. Who do we share your information with?

- 8.1 We share data with a number of organisations for specific purposes.
For example,
- If you are studying on an Open University validated award programme, we will share information with them when we enrol you with them at the start of your programme and during the conferment of awards process.
 - We share data with other organisations where we have a legal or regulatory obligation to do this, for example with the HESA, and with government departments. If you want to know more about how HESA uses your data, please see: www.hesa.ac.uk .
 - We will also share your data so that you can be invited to participate in surveys commissioned by the Office for Students (OfS) which may be carried out by contractors on their behalf. If you do not want to take part in the National Students Survey, please contact them via www.thestudentsurvey.com
 - We share data with organisations that provide funding, for example the Student Loans Company, other national funding authorities/ government bodies (e.g. Student Finance England) and sponsors (e.g. churches, trusts and sponsor organisations).
 - If you are studying on a programme of study that is run by All Nations in collaboration

with a partnership organisation, we may share your names with them (e.g. Operation World, Teach Beyond).

- When you register as a student, we will share some information with the Student Committee since you automatically become a member of the Student Body at registration.
- We may disclose your information to our third-party service providers and agents for the purposes of them providing services to us, or directly to you on our behalf. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service. We have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

8.2 More detailed information on who we share your personal information with is available in Appendix 2.

Other ways we may share your personal information:

8.3 We may transfer your personal information to a third party if All Nations ceases to exist and another organisation offers to continue your study. 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, visitors and students. However, we will always aim to ensure that your privacy rights continue to be protected.

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

9.1 If we collect your personal information, the length of time we keep it for is determined by a number of factors including our purpose for using the information and our legal obligations.

9.2 We have a retention schedule for information and keep identifiable records only for as long as they have a legal or business purpose:

- i. We keep academic transcript data at least until student date of birth + 120 years, in order to provide references and verify your study with us.
- ii. We keep some information relating to the module or qualification, and related queries and communications, for six years after you have completed the module or qualification, in order to inform our ongoing relationship with you, and in case it is necessary to establish, bring or defend legal claims.
- iii. We destroy some information within three years, where it does not have a longer term impact, and is not required for business purposes. See the Data Retention Schedule for more details.

10. Students' use of personal data

10.1 Students are occasionally expected to collect or use personal data as part of their All Nations' studies, for example for your assignment or research, but if you need to do so you must complete the Research Ethics Questionnaire and obtain approval for the processing of the data.

10.2 If you do need to process personal data, All Nations will be the data controller for these activities as long as you have followed the advice in Section 10.1 above. Otherwise, you will be the data controller for the personal data you process, and will be fully responsible for it. See the Information Commissioner's Office website for more information.

11. How does the College protect data?

- 11.1 All Nations is committed to the data protection principles of good practice for handling information.
- 11.2 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 that are locked when unoccupied.
- 11.3 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
- 11.4 We take every care when communicating with students in sensitive locations to ensure as far as possible that we do not compromise their safety, by only contacting them through the contact details they provide.
- 11.5 **Data Breach:** 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 or have been harmed by any breach.

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

- 12.1 All Nations will not transfer data outside the European Economic Area, except to respond to queries from those who provide contact details outside the EEA or at a student's request (e.g. to send a reference outside the EEA).
- 12.2 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 will either be by imposing contractual obligations on the recipient of your personal information, or by 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".

13. Automated decision-making

Applicant decisions are not based on automated decision-making.

14. What are your rights?

- 14.1 As a data subject, you have a number of rights. You may, on request:
- access and obtain a copy of the information we hold about you;
 - 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.

14.2 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 can be contacted at <https://ico.org.uk/concerns/handling>

15. How to Contact Us

15.1 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

15.2 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)

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

16. Notice Review

This notice is effective from May 2019. 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.

17. Glossary

Personal data: According to current data protection legislation 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data Controller: A data controller determines the purposes for which and the manner in which any personal data are processed. In essence, this means that the data controller decides how and why personal data are processed.

Special categories of data: Data Protection legislation sets out "special categories" of data which have to be given additional protection. These comprise your racial or ethnic origin, religious beliefs, political opinions, trade union membership, genetics, biometrics (where used for identity purposes) physical or mental health, sex life and sexual orientation. Information about criminal offences or criminal proceedings are treated similarly.

Cookies: A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone browser from a website's computer and is stored on your

computer's or mobile phone's hard drive. Each website can send its own cookie to your browser, if your browser's preferences allow it which the site can then access when you visit it again to track, for example, online traffic flows. A website cannot access cookies sent by other websites.

Privacy Shield: Privacy Shield is a framework which provides companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the USA. USA based organisations self-certify to the Department of Commerce and publicly commit to comply with the Framework's requirements, which is then enforceable under USA law.

18. Appendix 1: How do we use your personal data?

1. Activities relating to your contract with All Nations Christian College

The following data processing activities are necessary for the contract we have with you, as set out in your Student Terms and Conditions and Student Agreement. They include:

- Registering and enrolling you as a student with the College and, if on a validated award programme, with the Open University
- Administering your payments
- Maintaining your student record
- Administering your study, including assignment submission
- Monitoring your attendance at lectures and other learning events and placements, access to systems, examinations and assessments, facilitating reasonable adjustments for those qualified to benefit from them etc.
- Monitoring those involved in online study, including forums, on All Nations' VLEs to ensure they are engaging with the curriculum sufficiently
- Administering use of library resources
- Providing support services that are necessary for your study, e.g. Information and Learning Services support and Library resources and services. For example, information provided in medical assessments e.g. needs assessments for DSA, will be used by Information and Learning Services Team (ILST) to create a learning contract with you. This is shared with other staff with your permission and on a need to know basis.
- Managing queries, complaints, appeals and allegations of misconduct
- Providing academic support. We may also identify if you require additional support or specific services and contact you to offer support.
- Ensuring a safe environment. If you give us any information about your unspent criminal convictions, or restrictions you are subject to, we may use the information to restrict your access to services where required.
- Contacting you via your email address, telephone, video conferencing facilities and All Nations' Virtual Learning Environments (VLE). Some tutor groups and cohorts voluntarily set up a WhatsApp group to communicate with each other, if they wish to do so. This is optional.

2. Activities relating to our public task of delivering Higher Education Qualifications

Some of our data processing activities are necessary for our public task as a higher education provider as set out in relevant legislation. These include:

- Administering financial support and payments to students e.g. refunds, awards, bursaries, loans, grants or donations
- Providing statistical and management reports, for service improvement, forecasting and target setting, and to fulfil our legal obligations. This includes predicting and reporting on student numbers. This also includes special categories of data for equal opportunity monitoring to help us understand our student demographics and to fulfil our legal obligations.
- Analysing career choices and destinations of leavers
- Administering the publication of results and/or conferment of awards for non-validated programmes
- Administering the recording of marks
- Administering the progression of students, recommendation of results and awards at the Examination Boards for the subsequent ratification and conferment of awards by the Open University's Module Results Approval and Qualifications Classification Panel (MRAQCP).
- Long term retention of student data for verification of qualifications purposes.
- Improving the study experience and the quality and delivery of teaching and learning. This includes engaging students in evaluation exercise and quality enhancement activities. We generally use depersonalised student data to inform these activities/exercises, which can include completed assignments and records of learning events. We will ask you for feedback when you complete learning activities.

3. Information we process in our legitimate interests

We may use and process your personal information where it is necessary for us to pursue our legitimate interests for the following purposes:

a) Communications and marketing purposes

- To send you marketing communications about All Nations' events, or other services we offer. You are able to opt out of receiving marketing communications by using the contact details in Section 15 of the Student Privacy Notice above.
- To stay in touch with you after you graduate/leave/complete your studies. Before you leave, you will be able to indicate your preferences on a leavers form. Please see the Alumni Privacy Policy for further details.

- To analyse the make-up of our student body to inform our marketing strategy and to enhance and personalise student experience.
- To verify the accuracy of data that we hold about you and create a better understanding of you as a student.

b) Internal activities

- To prevent fraud and other criminal activities e.g. fraud in relation to public funding
- To audit our activities in order to ensure regulatory compliance
- To monitor use of IT services and ensure network and information security
- To test and maintain our systems
- To help us improve our services via staff training
- To record concerns about people at risk of being drawn into terrorism (the Prevent (Counter-Terrorism) Duty).
- To record wellbeing and/or safeguarding concerns

19. Appendix 2: Who do we share your personal data with?

1. Where we have a legal obligation to share data

Sharing information with government bodies

- We have an obligation to provide information about students on Open University (OU) validated programmes to other organisations under Higher Education (HE) legislation. We are required to send some of the information we hold about registered students to HESA. This information forms your HESA record. If you want to know more about how HESA uses the data, please see their privacy notice at <https://www.hesa.ac.uk/search/site/privacy>. We are also required to share statistical information with other English, Irish, Welsh and Scottish regulatory and government bodies under HE and other legislation.
- We have an obligation to provide information about visa students if requested by the United Kingdom Visa and Immigration department.

Sharing information with funding bodies

- If you are paying your fees via student loan information on your courses and fee liability is shared with the relevant funding body.
- If you apply for maintenance funding and/or Disabled Students Allowance, information about your course is shared with the relevant national funding body to progress the award.

- If you apply for discretionary financial support, we share information with the relevant funding body.
- These are legal obligations, governed by regulations made under the Teaching and Higher Education Act 1998: for England, Wales; Scotland, and Northern Ireland. Further information is available with the relevant funding application.

2. Where we share data as part of our public task of offering Higher Education qualifications

- Your contact details may be passed to survey contractors to carry out surveys that we need to carry out for statutory purposes, on behalf of OfS or HESA, such as the National Student Survey (NSS). The contractors will use your details only for that purpose and will then delete them. If you do not want to take part in the National Students Survey, please contact them via their website at www.thestudentsurvey.com/about
- If you complain about us, and escalate your request to the Office of the Independent Adjudicator (OIA), we will share details of your complaint with them.

Sharing under other legal bases

- We will provide academic references and confirmation of study to prospective employers and to your local authority or council, with your consent.
- We will provide contact information to the Student Committee to enable them to contact you with such things as a welcome pack, the College Bulletin, and other student notices, with your consent.
- We will share information with the emergency services where there is an emergency situation such as illness or serious injury, where this is in someone's vital interest.
- We will share information with the police and other agencies where necessary for the prevention and detection of crime, including under the Prevent (Counter-Terrorism) Duty and our safeguarding statutory duties.
- We will share financial information with our auditors to fulfil statutory requirements.

Third party service providers

We use third party service providers for supporting IT systems. We will only disclose to them any personal information that is necessary for them to provide their service. We have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.