



# Prospective Student, Applicant and Offer-Holder Privacy Notice

## 1. Introduction

This notice provides details about how Spurgeon's College uses your personal information when you make enquiries about studying with us (including by registering to attend our open days), make an application and if you go on to become an offer holder.

The College is the 'Data Controller' of your personal data and is subject to the General Data Protection Regulation 2016 (GDPR). We are registered with the Information Commissioner's Office (ICO).

## 2. What is personal information (also known as personal data)?

'Personal information' means any information about you from which you can be identified from that information alone or taken together with other information. It does not include data where your identity has been removed and where you can no longer be identified (anonymised data). It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes during your contact with us.

## 3. How does this notice relate to other information about data protection?

This notice covers the period before you become a registered student at Spurgeon's College from the time you make an enquiry about possible study at the College, through the application and offer-holder process. The Student Privacy Notice provides detailed information about how we use personal information when you are a registered student.

## 4. What personal information do we collect?

The College needs to collect, maintain and use personal data relating to or about you in order to deal with your enquiry; process your application; manage the provision of offers and the preparations for your arrival at the College.

For these making an enquiry to study this includes:

- Personal contact details such as name, title, and home address, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Course(s) applied for
- In certain circumstances we may ask you to provide some additional details such as the name of your previous institution of study and academic history including previous or predicted assessments and results, relevant prior learning (APL) and/or work experience.

For those applying to study at Spurgeon's College, and those in receipt of an offer for study at Spurgeon's, all of the above information, plus some or all of the following:

- Nationality
- Ethnicity
- Details of any disability
- English language ability
- Marital status and dependants plus information about parents/legal guardians (e.g. address details, passport information, employment history) and sometimes nationality information of other relatives for the purposes of a tuition fee assessment where fee status is under review
- Next of kin and emergency contact information where you are applying to for an access programme and are under 18 years of age
- National Insurance number (as part of the required identity checks for students that require a DBS check for safeguarding purposes)
- Copy of passport, visa and right to study documentation where relevant
- For the purposes of assessing eligibility for bursaries, applications for hardship funds programmes linked to these, a record of household income will be collected and maintained
- Your application form. We will use the details you provide on your UCAS application or in the case of direct entry (including pre-sessional courses and CPD) your Spurgeon's College application plus any supporting documents requested as part of your application and additional details provided by any referees and recorded following any interview or selection process.

## **5. Special Category Data**

The College will also process some information about you that is considered more sensitive and this is referred to as 'special category' personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK this also includes any personal information relating to criminal convictions and offences.

## **6. How do we use your personal information?**

We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition. In the case of those making an enquiry to study at Spurgeon's, prior to submitting an application or receiving an offer, we will process your personal information on the basis that we have a legitimate interest to respond to your enquiry.

Following the submission of an application to study we will use your personal information in the following circumstances where it is:

- necessary for the performance of our contractual obligations with you including preparing for a future contract (e.g. to manage your student experience, accommodation services and general welfare while you study at Spurgeon's College)
- necessary for compliance with a legal obligation (e.g. UK equal opportunities monitoring)
- necessary for the performance of tasks we carry out in the public interest (e.g. admissions research)
- necessary for the performance of our public task and pursuit of the legitimate interests of the College or an external organisation (e.g. to give you information relating to studying at the College).

We do not use your personal information to carry out automated decision-making processes.

## **7. Examples of processing**

The College will process the personal information you provide, including your application details and the other information referred to above for a range of purposes connected with potential future study, including the purposes of:

- identifying you
- sending you the course or study related information you requested and tracking your application status
- sending you other information by both mail and electronically relevant to an enquiry about studying at Spurgeon's College and/or making a choice to study at the College including sending you information about an Open Day event you have registered to attend. In certain circumstances where this information is not necessary for the processing of your application/offer you will be provided with the opportunity to opt-out of receiving some of this information
- processing your application to study at Spurgeon's College including any related applications for accommodation services
- verifying the information you provided
- deciding whether to offer you a place and communicating that outcome (together with any feedback)
- conducting a tuition fee assessment to ascertain your fee status
- conducting risk assessments of applicants under 18 years of age.

We may also use or disclose the information provided for the following statutory or public interest purposes:

- To prevent or detect fraud
- For equal opportunities monitoring
- To allow us to consider any future accommodation requirements when you have applied for Spurgeon's College accommodation
- To provide statutory returns required by applicable legislation
- For statistical purposes, but no information which could identify you will be published.

## **8. How do we use 'special category' personal information?**

We will only process special category personal information in certain situations in accordance with the law. For example, we can do so if we have your explicit consent and, in some circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do, we will provide you with full details for the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent, which you can withdraw at any time.

We do not need your consent to process special category personal data when we are processing it for the following purposes as these satisfy another legal condition:

- where we need to carry out our legal obligations
- where you have made the data public
- where processing is necessary for the establishment, exercise or defence of legal claims.

We will use your special category personal information in the following ways:

- your race, national or ethnic origin, religious, philosophical or moral beliefs or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting (including where for monitoring purposes conducted by the Higher Education Statistics Agency HESA)
- for certain courses of study, including on an individual, ad-hoc basis information about past criminal convictions will be processed where this is relevant because you will be working with children or vulnerable adults, and/or because of fitness to practise requirements in certain regulated professions
- information about your physical health or mental health or disability status where you choose to provide these details to us in order to receive an additional service, such as to request reasonable adjustments relating to a disability you wish to inform us about. This might be to help with attendance at an open day or for future study at the College.

## **9. Who do we share your personal information with?**

In addition to sharing your personal information with relevant Spurgeon's College staff for the purposes of dealing with your enquiry; assessing and processing your application or offer as required we will share your personal information for the above purposes as relevant and necessary with:

- Your referees
- Where relevant and as required and/or notified to you, your school/college or training organisation
- Your examination boards or awarding bodies
- Your student support assessment body
- Your funders and/or potential funders, including in the case of international applicants, the British Council or appropriate agencies
- Where relevant and as required, UK Visas and Immigration in order to act as your sponsor for visa purposes
- Where relevant and as required, governmental bodies including local authorities, the Home Office, and the Department for Work and Pensions and its agencies
- UCAS for the purpose of investigation in cases where we need to verify aspects of the application
- The University of Manchester, for those students registered on a University of Manchester accredited course.
- Liverpool Hope University, for those students registered on a Liverpool Hope accredited course.
- Other Higher Education organisations, in order to assist with tracking and research into access to Higher Education.
- The Higher Education Statistics Agency (for more information on how HESA use your data please go to <https://www.hesa.ac.uk/about/regulation/data-protection/notices>)
- Companies or organisations providing specific services to, or on behalf of, the College (e.g. payment platforms, IT providers)
- Any other relevant professional or statutory regulatory bodies e.g. Research Councils, where applicable.
- On occasion and where necessary, College auditors and, where required, other statutory bodies acting in an audit capacity
- The Baptist Union of Great Britain if you are a Baptist Union candidate
- To banks (and other payment agencies you may use), family members who are paying a deposit, application fees, or early tuition fee payments before student registration. Where appropriate and this includes the disclosure of relevant information to our supplier of banking services for the purposes of complying with anti-money laundering regulations.

Other than as set out above, we will not normally publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

## **10. International data transfer**

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers is located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

## **11. Who has access to your personal information and where is it stored?**

Your information may be processed by members of staff who have a business need to access the information in the performance of their roles within the College. Data will be stored in a range of different places, including on the College's secure IT systems and email.

## **12. How long do we keep your personal information?**

For those making an enquiry prior to application your data will be retained until the start of the next academic year. We store your personal information as part of your student record for the duration of your studies and for a defined period after you graduate. In addition, information directly relating to your studies and the qualifications you were awarded is retained much longer as stated above and this information may also be consulted as part of our assessment of any future application you make for further studies at Spurgeon's College. Detail about how long information is retained by the College is contained in the Records Retention Schedule and can be obtained on request.

## **13. How do we protect your personal information?**

We are committed to holding your data securely and treating them with sensitivity. All data are held securely and in accordance with the Data Protection Act 1998. Your data are held on a database hosted on a secure server within the College's IT network.

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We have put in place procedures to deal with any suspected data breach. If you suspect a data breach has occurred at the College, the organisation has a duty to report this to the Information Commissioners Office (ICO) within 72 hours. Please report suspected data breaches to the Data Protection Officer as soon as you can.

## **14. Your rights and how to contact us**

We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. In certain circumstances, by law you have the right to:

- Be informed as to how we use your data (via this Privacy Notice)
- Access or request a copy of the data we hold about you
- Update, amend or rectify the data we hold about you
- Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from us

- Ask us to remove your data from our records
- Withdraw consent, where it is used as a legal basis for processing
- Object to or restrict the processing of your information for any of the purposes outlined above.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you have any questions about this Privacy Notice, your data rights, or would like to receive a copy of the information we hold about you, please contact:

Rev Helen Stokley  
Data Protection Officer  
Spurgeon's College  
South Norwood Hill  
London  
SE25 6DJ  
[dpo@spurgeons.ac.uk](mailto:dpo@spurgeons.ac.uk) +44 (0)20 8653 0850

If you feel that we have let you down in relation to your information rights then please contact us so that we can discuss this with you and rectify the situation.

You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is [ico.org.uk](http://ico.org.uk) and their telephone helpline number is 0303 123 1113.

From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices change at some time in the future, we will always post the policy changes on this page.

<b>Document control box</b>			
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