



Student Privacy Notice

1. Introduction

This notice provides details about how Spurgeon's College uses your personal information while you are a registered student.

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 time with us.

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

When you applied to become a student you were told how the College would use your personal information to process your application and for related purposes in the 'Prospective Student, Applicant and Offer-holder Privacy Notice'.

This notice provides you with the details about the uses we make of your personal information while you are a registered student. In addition to the information published here, when you use specific additional or optional services and facilities offered by the College, you will be told about any other uses of your personal information.

4. What personal information do we collect?

The College needs to collect, maintain and use personal data relating to or about you. This includes:

- Personal contact details such as name, title, home and term time address, telephone numbers, and personal email addresses
- Date of birth

- Gender
- Ethnicity
- Nationality
- Details of any disability
- Marital status and dependants
- Next of kin and emergency contact information
- Course studied
- Records of payments made to the College
- Bank account details where required for the collection of fees and charges, and where applicable, bursaries and other payments made by the College
- Information about your assessments and results
- National Insurance number where required for Disclosure and Barring Services checks
- Where relevant a copy of passport, visa and other right to study documentation
- A record of the details you provided on your application form, any supporting documents requested as part of your admission and additional details provided by any referees and recorded following any interview process
- For the purposes of assessing eligibility for bursaries, hardship funds and programmes linked to the receipt of a bursary a record of household income will be maintained
- Records about you and your studies at Spurgeon's or at another institution or partner where you undertake a placement away from the College
- Records about your use of the academic and non-academic facilities and services that we offer
- CCTV footage and other information obtained through electronic means such as student (swipe) card records when you are on campus
- Information about your use of our information and communications systems
- Photographs used to identify you and those taken at College events. You will be informed separately where photographs are taken at events and consent will be sought before an image identifying you is re-used.

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 - including mental health and

disability information, 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. Most commonly, we will use your personal information in the following circumstances where it is:

- necessary for the performance of our contractual obligations with you (e.g. to manage your student experience and 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 our public task (e.g. teaching)
- necessary for the pursuit of the legitimate interests of the College or an external organisation (e.g. to enable your access to external services)

We may also use your personal information if we need to protect your vital interests (or someone else's interests), for example if you are taken ill.

If we require your consent for any additional uses of your personal information, for example using your image on our website, we will collect it at the appropriate time and explain this to you. You can withdraw your consent at any time.

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

7. Examples of processing

The College will process your personal information, including where applicable your image, 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 placements with external organisations), and determine/confirm your academic achievements (e.g. results, prizes)
- To administer student related policies and procedures including appeals, complaints, grievances, disciplinary matters (including plagiarism and academic misconduct) and matters related to health and welfare
- To operate security (including CCTV), governance, audit and quality assurance processes and arrangements
- To administer the financial aspects of your relationship with us and any funders, including international funders and manage the granting of scholarships, bursaries and other discretionary payments
- To deliver facilities or services to you (e.g. IT including the provision of a College email address, libraries, accommodation, careers, catering, counselling and student learning support services)
- To produce student identification cards containing images and maintain records of your image so that we can identify you.

- To support your training, medical, safety, welfare and religious requirements
- To compile statistics and conduct research for internal and statutory reporting purposes.
- To fulfil and monitor our responsibilities under UK equalities, immigration and public safety legislation
- To monitor the attendance of students in accordance with College policy, and where relevant for UKVI Tier 4 Visa compliance.
- To 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)
- To film and record certain lectures. Please note that students are not the subject of these recordings, although they may be visible and any discussion between lecturers and students as part of the activity may be recorded.
- Where relevant, to monitor, evaluate and support your research activity
- To enable your participation at events, including graduation ceremonies
- To facilitate your placement and supervision with a church or other placement setting
- To communicate effectively with you by post, email, and phone including the distribution of relevant newsletters and circulars containing information the College considers necessary to support your student experience. Where appropriate you will be given the opportunity to opt-out of receiving some communications from us
- We may also contact you by social media channels and applications where you have joined an official College social network or initiated contact with us in this way
- To administer employment contracts where you undertake paid work for the College (see Staff Privacy Notice).

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. Where you provide this type of information to us in order to receive an additional service, such as occupational health or counselling services you will normally be given further details about the use of this data.

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 it is necessary to protect your vital interests or those of another person and where you/they are physically or legally incapable of giving consent. This would be in an emergency situation where your health, wellbeing or welfare was at risk

- where processing is necessary for the establishment, exercise or defence of legal claims
- where processing is carried out as part of our legitimate activities with appropriate safeguards as a not-for-profit body with a religious aim, and you (as a student) have regular contact with us in connection to this purpose. Personal data is not disclosed outside the College without your consent.

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, placements and work opportunities information about past criminal convictions and offences will be processed where this is relevant because you are working with children or vulnerable adults, and/or because of fitness to practise requirements. In these circumstances a DBS check may be required, where this is the case you will be informed separately
- information about your physical health or mental health or disability status to ensure your health and safety whilst registered at the College and to assess your fitness to study, travel, take part in placements, provide appropriate reasonable adjustments and where you request it, to make decisions relating to applications for mitigating circumstances
- where you choose to provide the College with sensitive information about yourself for the purposes of student support we will use this to work with you and provide the support you requested
- where you interact with discussion or debate about religion or other matters that may constitute personal sensitive data when lectures or activities are recorded for educational purposes. Students have the option to opt-out of lecture recording in accordance with the College's Lecture Capture Policy.

9. Who do we share your personal information with?

As described above, your personal information is shared with relevant Spurgeon's College staff as required. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations or third parties, including the following:

- UK 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 (e.g. the UK Student Loans Company, BU)
- The providers of any external/collaborative learning, training, work and other

placements e.g. affiliated institutions such as the Baptist Union of Great Britain

- External examiners and assessors, and external individuals involved in relevant College committees or procedures
- The University of Manchester, for those students registered on a University of Manchester accredited course
- Liverpool Hope University, for those student registered on a Liverpool Hope accredited course
- Relevant UK Government Departments (e.g. Department for Education, Home Office (including UK Visas and Immigration), Foreign and Commonwealth Office, Department of Health) and other public bodies (e.g. HM Revenue and Customs, the Health and Safety Executive) for the assessment of student status for immigration and visa purposes; for the purposes of gathering census or other information including the assessment of fee
- Relevant Higher Education bodies (e.g. Office for Students, Universities and Colleges Admissions Service, Office of the Independent Adjudicator, the organisation(s) running the National Student Survey and other student surveys)
- Any other relevant professional or statutory regulatory bodies e.g. Research Councils, where relevant
- The College Students' Union, in order to facilitate your membership of this and associated clubs and societies. You have the opportunity to opt-out of membership of the Students' Union
- Croydon Council for the purpose of Council tax exemption or electoral registration for relevant students
- On occasion and where necessary, the police and other law enforcement agencies
- On occasion and where necessary, College auditors and, where required, other statutory bodies acting in an audit capacity e.g. OFSTED
- Companies or organisations providing specific services to, or on behalf of, the College under contract (a data processor) e.g. Microsoft for student email services
- To any third party wishing to access a catalogue within the College's library containing reference to student work
- To banks (and other payment agencies you may use), family members who are paying your fees, sponsors or other third parties to enable them to pay student debts and this includes the disclosure of relevant information to our supplier of banking services for the purposes of complying with anti-money laundering regulations
- To external agents and debt collectors acting for the College in relation to the repayment of student debts
- Where necessary the emergency services and your designated emergency contact where there is an urgent requirement to share information e.g.

- illness, serious injury, bereavement or the suspicion/risk of this
- Croydon Police, for relevant overseas students from certain countries only where there is a requirement to register under the terms of a tier 4 visa. In these cases only your name, date of birth and nationality and if applicable the details of any dependants are shared prior to your registration appointment with the Police
 - Confirmation of your results and qualifications awarded may be made available electronically and you can choose to share this information with third parties such as potential employers.
 - We will provide references to third parties with your consent
 - We will make your name and confirmation of your award available at your graduation ceremony.

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. How do we use your personal information after you graduate?

After you graduate a permanent record of you and your studies is retained indefinitely so that the details of your academic achievements can be confirmed and for statistical or historical research.

Once you graduate we will contact you about becoming a member of our alumni or College Conference. You will receive more details at the appropriate time and have opportunity to opt-out of being contacted for these purposes.

Your contact details will also be passed to HESA and/or an organisation contracted to undertake a graduate outcomes (further information is available from <https://www.hesa.ac.uk/about/regulation/data-protection/notices>) survey on their behalf. The survey contractor will only use your contact details for the survey and will delete them when the survey is closed. HESA may hold your contact details for further graduate outcomes surveys where these are in the public interest. Your responses to the survey of graduate outcomes will be made available to the College. These surveys are used to create statistics to meet the public interest in the outcomes of higher education

Further privacy and data protection information will be provided if you are contacted for any of these surveys. You might also be contacted as part of an audit to check that the survey has been undertaken properly.

12. 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. This will include staff members from finance, registry, IT, Library and Security.

Data will be stored in a range of different places, including your student file, and in IT systems such as the student database and College email system, and Moodle.

13. How long do we keep your personal information?

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 or withdraw from your studies. 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. Information about how long the College retains different types of information is published in the Records Retention Schedule.

14. 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.

15. 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 +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 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.

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