

# STUDENT ENQUIRERS PRIVACY NOTICE

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# 1. Aim of Privacy Notice

This Privacy Notice explains how Oak Hill College collects, stores, manages and protects data whilst you are enquiring about studying at Oak Hill. It outlines the types of data that we hold and how we use it to provide services to you. It also outlines what steps you can take if you would like us to change how we use your data or if you would like us to stop using it altogether.

This notice applies to those who make enquiries about studying at Oak Hill College, submit an application or are offered a place on a programme, or as a Flexible Learner, up to the point of enrolment. The term enquirer also includes someone who registers to attend an Open Morning or an enquirer event. There is a separate Student Privacy Notice and Supporters Privacy Notice, available on the Oak Hill website.

## 2. Oak Hill College responsibilities & legal basis for processing your data

Oak Hill College is committed to protecting your personal data. We aim to be clear how we use your personal information, and to not do anything with it you would not reasonably expect. We are the data controller for all the personal data we hold and process, except where we use data in the capacity of a data processor on behalf of another data controller.

Your personal data will be stored securely in digital and paper files, and on our student records system which is part of Oak Hill College's secure IT infrastructure.

Oak Hill College processes the information outlined in this privacy notice in pursuit of our legitimate interests in:

- Providing high-quality educational services to undergraduate and postgraduate level for Ordinands and Independent students
- Enabling the College to achieve its strategic and operational goals
- Supporting students in achieving their educational aims
- Improving the College and the educational standards
- Satisfying the awarding University
- Encouraging spiritual growth
- Communicating with enquirers, students, staff, and current and potential supporters
- Providing benefits and services to enquirers, students, staff, churches, church leaders and supporters
- Furthering the College's educational charitable mission
- Safeguarding and promoting the welfare of students and staff
- Promoting the interests of the College
- Keeping the buildings safe
- Using your information in connection with legal disputes i.e. if you bring a claim against the College
- Protecting the College's reputation
- Obtaining legal advice and in connection with legal disputes
- Ensuring that all relevant legal and statutory obligations of the College are complied with (for example, Health & Safety, Church of England and Office for Students (OfS) registration and inspections, compliance auditing, Charity Commission, eligibility to study in the UK, court orders, financial auditing).

Some of the above may also be examples of when the College uses your information to perform tasks in the public interest (for example, in facilitating efficient operation of the College, ensuring that we comply with all of our statutory and legal obligations). In addition your personal information may be processed for the legitimate interests of other organisations (for example, insurance company).

Whilst the College relies on legitimate interest as the legal basis for processing, where this is not overridden by the interests and rights or freedoms of the data subjects concerned, it recognises that it is not the only lawful ground for processing data.

As such, where appropriate the College will sometimes process your data on an alternative legal basis (for example, because you have given us consent to do so).

In limited circumstances the College may use your information to protect your vital interests or the vital interests of someone else (for example, if you are seriously ill at College).

### **3. Where does Oak Hill collect the data from?**

The vast majority of the information we hold is obtained directly from you. Depending on how far through the application process you go this may also include your application form, references, interview notes, Financial Assurances Form and supporting documentation and, for Anglican Ordinands, a copy of your Stage 2 report which Ministry Division provide. The Student Privacy Notice explains further about the information which we hold on you once a Student.

### **4. What information do we collect about you?**

Oak Hill College collects information about you from the enquiry stage through to starting at college. The personal information we will collect and process at various stages through the enquiry stage will include for example:

- name, date of birth
- address, contact details including a telephone number, personal email address
- spouse name and any children (for example, for accommodation requirements)
- student reference number
- references
- information about your health and any support needs you may have, information from Doctors or other professionals (where we need this to look after you or make reasonable adjustments)
- criminal offences in relation to Safeguarding
- education history
- employment history
- personal statements
- records of all contact we have with you
- ethnicity, nationality
- sex and sexual orientation
- photographs
- funding information, supporting church (where relevant).

## **5. How we use your personal information**

We will only process your data for the specific purposes that we tell you and then only to the extent necessary for that specific purpose e.g. registering for an event, responding directly to your enquiry, following up with you after an event.

Some of your information will be shared internally, but will be restricted only as necessary to enable you to find out more about the college and to process your application.

Sensitive personal information which the College may reasonably hold include your racial or ethnic origin, your sex, your socio-economic background religious or philosophical beliefs, your medical information (to ensure that we make reasonable accommodation for your medical needs), your sexual orientation and details of your emergency contacts (to ensure we can contact nominated individuals in the case of an emergency), and self-declaration information about criminal convictions.

If you apply to live in Oak Hill College accommodation, the Site & Facilities Department will have access to relevant information (for example, your email address) to assist with preparations for your arrival.

Applicants are asked to provide a photo if they accept the offer of a place to study. The photo is then placed on the applicant's electronic file. The electronic copy of the photo is retained for those who become students and used for their College identification pass, and for the learning platform.

We use CCTV and details recorded via the Salto door logs for monitoring and safety reasons. Images captured and records produced are only investigated and kept if there is due reason, usually of a safety or criminal nature. Please refer to the CCTV Policy.

Not all enquirers complete the process within the application time frame for a particular yearly intake, so enquiries/applications are retained indefinitely to facilitate progress in future years or for historical, research or statistical purposes

We may use third-party partners to support the legitimate activities of the college. If you interact with the College through a third party (for example, Diocese, Church Minister) then we may obtain information about you from that third party. The sharing of data in this manner is subject to the third party's own privacy policy. Data obtained in this way is treated no differently to any other once held by the College, and is bound by the terms of this Privacy Notice as soon as it is received.

If you do not become a student and wish to be on the College's mailing list please complete the online form on the website.

## **6. Protecting your data & sharing data with third parties**

We are committed to holding your data securely and treating it with sensitivity. Your data is held on a database hosted on a secure server within the College's IT network. Access is restricted to staff and workers who need to see the data to carry out their duties at the College. User access rights to the database are restricted according to individual job roles in order to ensure that users only see information relevant to them. This access is reviewed on a regular basis.

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside the College other than those which are either acting as agents for the College (for example, if we use a company to print and send out documents) or have a legitimate reason to hold the

information (for example, Middlesex University, OfS). All external entities with whom data is being shared or processed and to whom we are not legally bound has to provide sufficient guarantees under the data protection legislation. We will never sell, trade or give away your data.

Although most of the information we store and process stays within the UK, some information may be transferred to countries beyond the UK. This may occur if, for example, one of our trusted partners' servers is located in a country outside the UK. 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.

We may need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies) or if we have your permission to do so. In the case of HESA and the OfS this would be anonymised statistical information.

## **7. How long we keep your information**

We will process your personal data only as long as is necessary for the purpose(s) for which it was collected (unless otherwise advised – see caveats in section 5) and in accordance with the College's records retention schedule. Data will be kept securely and destroyed when no longer required. The College may also decide to archive some data.

## **8. Your rights & how to contact us**

We will always try to ensure that the data we hold for you is up to date, reasonable and not excessive. You will always 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
- 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 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:

Director of Operations & Finance  
Oak Hill College  
Chase Side  
London, N14 4PS  
Tel: 020 8449 0467

If you have a concern about our handling of personal data, then please contact us, via the Director of Operations & Finance at the address above, 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.

We will amend this privacy notice periodically to ensure it remains up to date and reflects how and why we use your personal data or new legal requirements. The current version will always be posted on the Oak Hill website.

## 9. Document Control

<b>Date last approved</b>	November 2023
<b>Approved by</b>	Director of Operations and Finance
<b>Status</b>	Approved
<b>Previous reviews</b>	Approved Autumn 2018, reviewed Autumn 2019, April 2021, October 2022
<b>Next review</b>	When needed