

# STUDENT PRIVACY NOTICE

## Contents

1. Aim of Privacy Notice	1
2. Oak Hill College responsibilities & legal basis for processing your data	1
3. Where does Oak Hill collect the data from?	2
4. What information do we collect about you?	2
5. How we use your personal information	2
6. Protecting your data & sharing data with third parties	4
7. How long we keep your information	4
8. Your rights & how to contact us	4
9. Document Control	5

# 1. Aim of Privacy Notice

This Privacy Notice explains how Oak Hill College collects, stores, manages and protects Student data. It outlines the types of data that we hold and how, as required by your Student type, 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 full time and part time students, Flexible Learners, spouses of students or faculty who are auditing or crediting, and anyone studying with Oak Hill. Once your studies have ended there is a separate Privacy Notice for Alumni 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 & learning platform 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 students, staff, and current and potential supporters
- Providing benefits and services to 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 ie if you bring a claim against the College
- Protecting the College's reputation
- Obtaining Legal advice
- 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 registration and inspections, compliance auditing, Charity Commission, eligibility to work 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, providing references to a potential employer, insurance company, sponsoring organisations eg Church of England).

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, to enter into a contract with you in order to fulfil contractual obligations we may have, or to provide a reference or a financial reference for mortgage or rental purposes.)

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, Safeguarding issues).

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

The vast majority of the information we hold is obtained directly from you, primarily through the application process, including your application form, references and interview. In addition, if you are an Anglican Ordinand, Ministry Division will send us a copy of your Stage 2 report which goes on your file. Information about you increases during your time at Oak Hill to include information generated by your coursework. College conducts a regular student data check with students.

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

Oak Hill College collects information about you from when you complete your application form, and throughout your time at the College.

Oak Hill College maintains a record of students and, as such, we hold limited education records in perpetuity. These include your duration of study, the course name and your qualification.

The personal information we will collect and process will include name, date of birth, address, contact details including a telephone number and personal email address. The information we collect might also include spouse and family (for example, via accommodation agreements), student reference number, references, medical information you declare, information from Doctors or other professionals (where we need this to look after you or make reasonable adjustments), assessed work and submission dates, academic records, extensions and deferrals, stipend information, ethnicity, nationality, sex, gender, photographs, funding information and what you are doing up to 15 months after you completed your study.

### **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.

Some of your information will be shared internally, but will be restricted only as necessary for the furtherance of your studies, your vocational formation and your personal welfare.

Safeguarding concerns may require sharing of information with the local authorities, Church of England Safeguarding Team, police, or externally appointed safeguarding advisors.

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

If you live in Oak Hill College accommodation the Site & Facilities Department will have access to limited information (for example, your address). On very rare occasions it may be necessary for relevant site staff to have some medical information (for example, if you are epileptic, diabetic) so swift and appropriate action can be taken in case of an emergency.

Although information collected about you is for legitimate reasons, the College may ask for your consent to use your information in certain ways. For example, the College may ask for your consent before taking or using some photographs, videos and films (for example, if the photograph, video or film is going to be distributed widely say on social media or in print). If the College asks for your consent to use your personal information you can withdraw this consent at any time. Any use of your information before you withdraw your consent and use of material until a suitable replacement is made remains valid. Already printed matter may continue to be distributed until supplies are exhausted (for example, College Prospectus).

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.

Recorded lectures will have identifiable names, images and voices of participants. Lectures are uploaded onto Acorn (the College's Virtual Learning Environment) for students and auditing students registered on the respective module. They are not intended for public use or for students not registered on the given module. There is requirement in the Regulations and Procedures Handbook for students and staff not to download and keep, or pass on lecture recordings. Where students have been permitted to make individual recordings - normally in connection with a particularly specific learning difficulty - students are requested to delete any such recordings before they leave Oak Hill.

The College will keep relevant information about you indefinitely in case it is needed for historical, research or statistical purposes. For example, there may be a statutory requirement for College to provide details, such as for a safeguarding investigation.

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, supporting Oak Hill College via Stewardship, Student Loans Company, Diocese, Church Minister, Grant providers) 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.

You will have the opportunity to join the College's mailing list when you leave college. If you wish to be on the College's mailing list after you have left, 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 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 student records system 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, placement supervisor). All external entities with whom data is being processed 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.

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

Oak Hill College considers its relationship with students, members and supporters to be lifelong. Generally, we will process your personal data only as long as is necessary for the purpose(s) for which it was collected (unless otherwise advised) 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 for statistical, research or historical purposes. Please see the Alumni Privacy Notice for further information.

## **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 the Director of Operations & Finance.

If you have a concern about our handling of personal data, then please contact us, via the Director of Operations & Finance at the address below, so that we can discuss this with you and rectify the situation.

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

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>	October 2022
<b>Approving Committee</b>	Data Protection
<b>Status</b>	Approved
<b>Previous reviews</b>	Approved August 2018; reviewed Autumn 2019, January 2021