

# College Application Privacy Notice

At Havering Sixth Form College, we're committed to protecting and respecting your privacy.

This Privacy Notice explains when and why we collect personal information about people who submit an application to study at our college, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes.

Any questions regarding this Policy and our privacy practices should be sent by email to [DPO@havering-sfc.ac.uk](mailto:DPO@havering-sfc.ac.uk) or in writing to DPO, Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3TB. Alternatively, you can telephone 01708 514400.

## Who we are?

Havering Sixth Form College (HSFC) is a large Sixth Form College located in Hornchurch, Essex. The College is located on one site and consists of eight buildings. The College provides full time education for over 2,700 students (16-19 years old) across a broad range of subjects. These students are supported by over 250 staff (support and teaching). Whilst most administrative staff are located in the central building, teaching staff are geographically spread across the site in subject specific areas.

## Who collects data on behalf of Havering Sixth Form College?

For the purposes of data collection, Havering Sixth Form College will be the Data Controller and is represented on behalf of the college by the Director of Strategy, Planning and Management Information. The Data Controller will ensure that the processing of data, carried out by Data Processors, on behalf of the college is fair and in accordance with the requirements of GDPR.

## How do we collect information from you?

When you complete and submit an online application to join the college we need to know your basic personal data in order to process your application. We will not collect any personal data from you that we do not need in order to provide and oversee this services to you. If you do not provide the required information, then Havering Sixth Form College will not be able to process your application and we will not be able to consider your application.

## What type of information is collected from you?

The personal information we collect includes your name, preferred name, gender, date of birth, current address, telephone number(s), email address, nationality, first language, school name(s), period of residency in the UK or EU and IP address, your Unique Learner Number (ULN) and Unique Candidate Identifier (UCI) (if known) (as well as information regarding what pages you accessed and when (See Appendix 1). We use the lawful basis of legitimate interest when collecting and processing your personal information.

We will also collect information about the Person with Parental Responsibility for yourself. The personal information that we collect in this case includes their title, forename and surname, their email address and their mobile phone number. As this information has been provided by yourself and not the person directly then we will contact them to ensure that they are happy to be nominated as such and to ensure that the information provided is accurate. Again the lawful basis that we use is legitimate interest.

We further collect personal information about your ethnicity, health and if you already have an Education, Health and Care Plan (EHCP) in place. This is considered to be Special Category Data and as such we are especially careful when processing it. Again we consider legitimate interest to be the lawful basis for processing and that the information is provided in order for the college to perform its legal obligations.

If you complete any forms on our websites, we will process this information on behalf of the college as the Data Processor. This information will be stored securely in a database, emailed to a contact at the college, or both. We will never sell, distribute or release this information to third parties unless we are required to do so by law.

## How is your information used?

We may use your information to:

- process an application to study with us/work for us.
- to carry out our obligations arising from any contracts entered into by you and us;
- to carry out statistical analysis of trends in data.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

## Links to other websites

Our website contains links to other websites run by third party organisations. Where possible data is provided to these companies in order to access their facilities. However, this privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites that you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## Who has access to your information

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information is located on servers within the European Union. No 3rd Parties have access to your personal data unless the law allows them to do so. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

## Third Party Service Providers we work in association with:

We may transfer your personal information to a third party if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights or safety of our staff and students. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## Third Party Service Providers working on our behalf:

We may pass your information to third party organisations for the purposes of completing tasks and providing services to you on our behalf (for example to register you with an Awarding Bodies).

## How long will we keep your information for?

Student Data: We retain all student records for a period of 10 years from the date a student completed their studies. This date is determined as the date on which the leavers form has been completed or the last date of the term in which the student left. Some data such as transcripts of student marks may be retained in perpetuity.

Where an application form has been completed and/or interview notes have been made but the applicant does not enrol then their data will be retained until the 31st January of the Academic year for which the application was made, after which it will be deleted/destroyed.

More information on our retention schedule can be found at

## Am I able to see what data you hold on me and how it is processed?

Yes, you have the right to obtain confirmation that your data is being processed lawfully and to access your own personal data. There is no charge for this service unless the request is considered manifestly unfounded or excessive, particularly where it is repetitive. Then HSFC may charge a 'reasonable fee' which may also apply should further copies of the same information be requested. This fee will be based on the administrative cost of providing the information.

Once your identity has been verified then you will be provided with the information held within one month of the receipt of the request. This period may be extended to a further two months where requests are complex or numerous however you will be informed of this within one month of the request being received with an explanation why an extension is necessary.

## How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [DPO@havering-sfc.ac.uk](mailto:DPO@havering-sfc.ac.uk) or by writing to Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3TB. Alternatively, you can telephone 01708 514400.

## What can I do if I believe the information you have about me is inaccurate?

If at any point you believe the information we process on you is incorrect you can request to see this information and have it corrected or deleted. If you wish to raise a complaint on how we handled your personal data, you can contact us to have the matter investigated. please email us at: [DPO@havering-sfc.ac.uk](mailto:DPO@havering-sfc.ac.uk) or by writing to Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3TB. Alternatively, you can telephone 01708 514400.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office <https://ico.org.uk>

## What can I do if I no longer wish the college to process my data?

If you decide that you no longer wish to attend the college before enrolment has taken place, then you have the right to withdraw your consent for data processing to take place and if request it that your data to be erased. If you wish to exercise this right then please email us at: [DPO@havering-sfc.ac.uk](mailto:DPO@havering-sfc.ac.uk) or by writing to Havering Sixth Form College, Wingletye Lane, Hornchurch, RM11 3TB. Alternatively, you can telephone 01708 514400.

## Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software **128 Bit encryption on SSL**. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## 16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

## Review of this Policy

We keep this Policy under regular review. This Policy was last updated in June 2018.