

Loughborough College Privacy Notice – Careers and Enterprise Hub

1. Scope and Purpose

This privacy notice tells you about the information we process about you if you use the facilities of the Careers and Enterprise Hub run by Loughborough College. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

2. Policy Statement

In order to comply with its contractual, statutory, and management obligations and responsibilities, Loughborough College is required to process personal data relating to its customers, including potentially 'sensitive' personal data, as defined in the UK's Data Protection Act 2018 and other relevant legislation which includes information relating to health, racial or ethnic origin, and criminal convictions.

All such data will be processed in accordance with the provisions of these laws and Loughborough College's Policy on Data Protection, which may be amended from time to time. For the purposes of the Act and this notice, the term 'processing' includes the initial collection of personal data, the holding and use of the data, as well as access, disclosure, through to final destruction. In certain circumstances, the provisions of the Act and laws permit Loughborough College to process a customers personal data, and, in certain circumstances, sensitive personal data, without their explicit consent. Further information on what data is collected and the purposes for which it is processed is given below in this notice.

The Data Protection Officer/GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Loughborough College collecting/processing their personal data.

Loughborough College staff who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Equality Impact Assessment

This policy/procedure has been assessed for its impact on equal opportunities and will be informed by the aim to eliminate all forms of discrimination in all strands of the equal opportunities legislation.

4. Privacy Notice

4.1. Who are we?

We are Loughborough College. Our address is Radmoor Road, Loughborough, Leicestershire. LE11 3BT. You can contact us by post at the above address, by email at dataprotection@loughcoll.ac.uk or by telephone on +44 (0)1509 618 375.

We are required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to DPO@loughcoll.ac.uk or by using the address or phone number above.

4.2. What is personal data

Under the UK's Data Protection Act 2018, the UK GDPR and the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

4.3. How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us, for example when you express your interest in either studying at Loughborough College or in seeking employment through our services.
- when you communicate with us by telephone, email, for example in order to make enquiries or raise concerns;
- from third parties, for example from your previous or current school, sixth form college, university or government agencies who may want to assist you in looking for employment or further studies.

4.4. The types of information we collect

We may collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality.
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results.
- sensitive personal data and information about criminal convictions and offences, including:
 - information concerning your health and medical conditions (e.g. disability and dietary needs);
 - certain criminal convictions (e.g. for students on nursing programs, following completion of an annual declaration of “good character”); and

- information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

4.5. How we use your information

The purposes for which we may use personal data (including sensitive personal data) we collect during your association with us include:

- To assist with admissions should you choose to apply to learn through Loughborough College;
- To assist in finding employment, which may include sharing your curriculum vitae with organisations.
- Monitoring equal opportunities;
- Meeting our legal reporting obligations (e.g. Government Departments)
- other administrative purposes, including:
 - carrying out research and statistical analysis;
 - carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
 - preventing and detecting crime;

4.6. The basis for processing your information and how we use it

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you are enrolled as a student, as part of the advisor and admissions process;
- to be able to work with other organisations in helping you apply for employment opportunities;
- to deal with any concerns or feedback you may have;

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

- to monitor and evaluate the performance and effectiveness of the College, including by training our staff or monitoring their performance;
- to maintain and improve the academic, corporate, financial, estate and human resource management of the college;
- to promote equality and diversity throughout the college;
- to seek advice on our rights and obligations, such as where we require our own legal advice;

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional);
- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

4.7. Sharing information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited personal data to a variety of recipients including:

- our employees, agents and contractors where there is a legitimate reason for their receiving the information, including but not exclusively:
 - third parties who work with us to provide student support services (e.g. counselling).
 - Third parties that may provide additional training and advice to assist in furthering your skills for future employability.
 - Potential future employers.
 - internal and external auditors.
- government departments and agencies where we have a statutory obligation to provide information (e.g. the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes));
- crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);

4.8. International data transfers

Some of the personal data we process about you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

4.9. Changes to your personal data

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. Some details can only be changed in person, however we can advise further if you call into the Careers and Enterprise Hub, or email CareersHub@loughborough.ac.uk

5. Accuracy of data

Loughborough College is required to take reasonable steps to ensure that any personal data it processes is accurate and up-to-date. It is the responsibility of the individual to inform Loughborough College of any changes to the personal data that they have supplied to it during their association with the college by emailing CareersHub@loughborough.ac.uk

6. Retention period

Loughborough College will process personal data for whilst you are a customer and will store the personal data for a period of time once you have ceased to be a customer. The retention period for different classifications of personal data has been established in line with information management guidelines and for the purposes of the Careers and Enterprise Hub will be the current academic year plus one year.

7. Individuals Rights

Under data protection legislation, you have the right to request access to information about you that we hold. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- *The right to be informed* - under transparency requirements in the new laws, you are informed about the collection and use of personal data
- *Right of access* – you have the right to request a copy of the information that we hold about you.
- *Right of rectification* - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- *The right to erasure* - in certain circumstances you can ask for the data we hold about you to be erased from our records
- *The right to restrict processing* - where certain conditions apply to have a right to restrict the processing of personal data
- *The right to data portability* - you have the right to have the data we hold about you transferred to another organisation
- *The right to object* - you have the right to object to certain types of processing such as direct marketing
- *Rights in relation to automated decision making and profiling* - you also have the right to be subject to the legal effects of automated processing or profiling

8. Requesting access to your personal data

To make a request for your personal information, contact our Data Protection Officer at dpo@Loughborough.ac.uk
If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or write to them at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

9. Further information

If you would like to discuss anything in this privacy notice, please contact: Data Protection Officer at dpo@Loughborough.ac.uk or the data protection advisor at DataProtection@Loughborough.ac.uk