



Data Privacy Notice & Consent Policy

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Linked policies:	Policy on your Rights in Relation to your Data
External references	Data Protection Act 1998, 2018 Article 51 GDPR
	UK Quality Code UKSCQA/02 Advice and Guidance on Monitoring and Evaluation (6.7) <i>Providers take account of ethics and data protection requirements when designing and operating monitoring and evaluation systems.</i>
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Audience:	Website , face to face, email, College notice boards

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1. Introduction

This privacy notice informs you of what to expect when Oxford Business College collects your personal information and what your rights are in respect of that information. The College manages all personal information in accordance with its legal obligations under English Law.

At Oxford Business College we do all we can to respect your right to privacy and the protection of your personal information. The College has appointed a Data Controller of this data under the Act and is registered with the Information Commissioner's Office. Its registration number is Z1097339. Oxford Business College may change this policy from time to time by updating this page. You should check this page to ensure that you are happy with any changes.

2. Privacy statement

We take your privacy seriously and will only use your personal information to administer your account and to provide the services you have requested from us. We will never sell, share or use your personal information other than as described here.

3. About this privacy policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Oxford Business College.

4. How we operate

We operate in line with EU GDPR (May 2018) data protection guidelines. We are committed to maintaining your personal rights and allow all users to change or withdraw their opt-in options at any time. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office.

5. To whom this privacy policy applies

Oxford Business College is a Higher Education Alternative Provider. This policy relates to users of Oxford Business College. Processing of your data is required in order to offer you these services. This policy applies to individuals who have registered with Oxford Business College as either a student, user, administrator, or in any other capacity.

6. What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes (as a student):

- Information you provide during the registration process
- Information you provide when we create campaigns
- Information you provide in the form of number data, messages or meta-data
- Information we collect about how you use the website
- Information relating to purchases and other transactions
- Information given and stored as part of our ongoing relationship

7. Scope of consent

By submitting your personal data to an OBC College site, a student/user is affirming explicit consent for such information to be used in accordance with this privacy policy. They will be able to withdraw that consent at any time by the methods described.

8. Opting out at a later date

Once consent has been given, consent can be amended or withdraw at any time. Processing can also be objected to at any time. We respect all user rights as defined in GDPR.

9. How we store and process personal data

Data will be collected stored and processed in the UK only. Data will be stored for Up to 7 years after the last recorded login attempt. In order to provide updates and offers that may be of interest to a user we use recognised third parties to take payment, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU.

10. Our obligations

We appoint a data controller. In relation to the information provided to us, we are legally responsible for how that information is handled. We will comply with the Data Protection Act 1998 and the GDPR (2018) in the way we use and share personal data. Among other things, this means that we will only use personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes

We will process personal data ourselves as the data processor. We will take reasonable precautions to safeguard the personal information that is supplied by individuals.

Oxford Business College may from time to time use someone's personal information for marketing, account management or relationship management purposes. The main purpose of this is to provide them with information about services which we think may be of interest to the individual and/or to maintain any existing relationship we may have with them.

11. **Third parties**

Individuals' data is not shared with any third parties other than as described here.

12. **Legitimate interests**

Under the Data Protection Act, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to someone).

13. **Contacting us, exercising information rights and complaints**

If there are any questions or comments about this Privacy Policy, or if someone wishes to exercise their information rights in connection with the personal data they have shared with us or wish to complain, they must contact: The Data Protection Officer at Oxford Business College. We will process SARs within 20 days, SAR responses are usually free, but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

14. **What information do we collect about people?**

We collect information about students when they enquire, apply and enrol on our courses. We also collect information when they voluntarily complete learner satisfaction surveys, provide feedback or participate in competitions.

Personal data relating to employees, students etc. that we collect includes:

- Name
- Job title
- Date of birth
- Passport data
- Home address
- Home telephone number
- Private email address
- Emergency contact
- Bank details etc.

Special categories of personal data (sensitive personal data) relating to an employee/student can include racial and ethnic origin, religion, biometric data, sexual orientation, health records etc.

We need to collect the following sensitive data about you in order to deliver a service, provide a course or qualification or comply with awarding and regulatory bodies.

Where we collect sensitive data, we need to explicitly state what it is being collected for, where, and how it is being stored. We need to carefully consider any lawful basis for this.

15. Why we hold information about people

We process personal information to enable us to fulfil our public tasks including our responsibilities as the lead regulator for higher education in England. This function is directed by the secretary of state and is in accordance with our legal obligations including those described in the Higher Education and Research Act 2017. We also have a role in monitoring the performance by higher education providers of their 'prevent' duty under the Counter-terrorism and Security Act 2015.

Personal information is also used for:

- promoting and administering our services
- maintaining our accounts
- administrative purposes
- supporting and managing our staff
- journalism and media
- property management.

The College is committed to people's privacy.

Information collected about students during their learning including any enquiries and applications will be used for educational administration, guidance, statistical research and health and safety purposes.

Information will be shared with other organisations directly associated with funding, education support and guidance in accordance with our data protection notification. Processing this data will enable the performance of the College to be monitored and for the College to operate effectively and plan future provision.

16. How will people's information will be used?

Purpose/Activity	Type of data	Lawful basis for processing
To register someone as a new student	(a) Identity, (b) Contact	Performance of a contract with them
To process and deliver their order including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with them, (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with them which will include notifying them about changes to our terms or privacy policy, and asking them to leave a review or take a survey	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with them, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how students use our services
To enable them to partake in an event, seminar, competition or complete a survey	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications	(a) Performance of a contract with them, (b) Necessary for our legitimate interests to study how students use our products/services, to develop them and grow our business
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to them and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how students use our services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of students for our services, to widen participation, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to them about services that may be of interest to them	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

We may process someone's personal data without their knowledge or consent where this is required or permitted by law.

- Administering finance (e.g. fees, contracts, payroll and payments)
- Providing support services
- Providing, IT and information services
- Managing accounts
- Monitoring equal opportunities
- Carrying out research and statistical analysis
- Providing operational information
- Promoting /marketing our products and services
- Safeguarding & Prevent
- Security

- Preventing and detecting crime
- Where necessary for your legitimate interests

At no time will someone's personal information be passed to other organisations for marketing or sales purposes.

Accepting a place on a College course gives consent for the College to hold and use information about someone. **In addition, it may also mean that consent given for the College to make video or audio recordings of them for assessment purposes only.**

If they do not wish to give this consent, then the College may not be able to offer them a course place and may withdraw any offer already made. If they have any concerns about this, they should contact the Data Controller (Head of Programme).

The data supplied for some students on College courses may be passed to AP Student Record Service for the purpose of allocating them a Unique HUSID number and the creation of their Personal Learning Record. The AP student record is used to enable collection and sharing of data within the education sector. The Personal Learning Record will be a lifelong record of their learning and qualifications, which will be accessible to them, organisations linked to their education and training and any other organisations they choose.

For further details of how personal data is shared and used by AP student record, contact the Data Controller by emailing headofacademics@oxfordbusinesscollege.ac.uk OR enquiries@oxfordbusinesscollege.ac.uk.

17. Student loan company, local authority and sponsoring body

We may be required to report on a student's attendance and performance to their sponsor, embassy and or the Student Loan Company (SLC) upon request, if they have been assessed for eligibility for support. Reports may also be provided to a sponsoring body, sponsoring employer or Local Authority provided that receipt of information on the student's progress forms part of the conditions of their sponsorship.

The College receives information from the Student Loans Company (based on data that the student has supplied to the Local Authority) for use in determining eligibility for some bursaries and financial support.

18. Debt collectors

In case the College is unable to directly collect a debt owed, we may be required to share someone's information with an appointed debt collecting agency for the College. The student will be sent reminder emails for any outstanding fees from the finance team and offered an opportunity to discuss a payment plan. Should there be no response or communication or an inability to keep to a payment plan, the College will refer them to the debt collection's agency. This might affect their credit ratings.

19. **Police**

In certain circumstances, the College may be required to disclose personal data to the police or courts for the purposes of the prevention of crime, or where it is necessary to protect someone's vital interests, in an emergency.

20. **Plagiarism detection**

The College reserves the right to utilise electronic plagiarism detection systems. The use of these systems allows the College to check systematically for plagiarism by comparing students' submitted work to material on the World Wide Web, in extensive databases and to other students' work.

21. **Marketing**

We would like to send students information about courses and events of ours which may be of interest to them using the email they have provided. They have the right at any time to stop us contacting them for marketing purposes.

Students will receive marketing communications from us **directly** if they have:

- requested information from us or purchased services from us; or
- if they provided us with your details and ticked the box at the point of entry of your details for us to send them marketing communications; and
- in each case, they have not opted out of receiving that marketing.

Where they opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a service purchase. If they no longer wish to be contacted for marketing purposes they should email enquiries@oxfordbusinesscollege.ac.uk requesting removal from marketing lists.

When our website is accessed, the site uses cookies. It does not directly store IP addresses. The site uses Google Analytics to help provide a better experience.

22. **Contacting the Head of Media and Communications**

If a student has any website related queries, they can send an email to the Head of Media and Communications, arun.asthana@oxfordbusinesscollege.ac.uk.

1.0. **What are student rights?**

Students have a right to access their personal information, to object to the processing of their personal information, to rectify, to erase, to restrict and to port their personal information. Any requests or objections should be made by email to enquiries@oxfordbusinesscollege.ac.uk

2.0. Security of information

We have put in place appropriate security measures to prevent people's personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process personal data on our instructions, and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If anyone has any queries or concerns about your data usage, they should contact us. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about them. We do not control these third-party websites and are not responsible for their privacy statements. When a student leaves our website, we encourage them to read the privacy notice of every website they visit.

DATA SUBJECT CONSENT FORM

Oxford Business College

65 George Street

Oxford

OX1 2BQ

Full name of the individual signing this form:

Address

Consent Agreement

I hereby acknowledge my consent in respect to Oxford Business College collecting, using, storing and deleting my personal data for the purpose of running, monitoring, reporting and promoting academic programmes for the period of seven years. I shall transfer my data for use of the data within the purposes described here to an authorised member of the Oxford Business College team ensuring that the data is processed in compliance with requirements of the GDPR data protection regulations.

Contact details of the student or stakeholder

Email _____

Phone no _____

I have made available my personal data to Oxford Business College. I understand that I am entitled at any time to request an update of my data, information regarding use of my data, as well as to withdraw the consent provided hereby and deletion of my data and all rights under the GDPR.

Name

____.____.____.

Date