



Privacy Notice for Applicants, Students, Apprentices, Employers of Apprentices & Alumni

INTRODUCTION

1. This Privacy Notice applies to registered students, apprentices, employers of apprentices, former students, former apprentices, alumni and applicants. It explains how the College processes your personal data. This notice does not form part of any contract.
2. The College may update its Privacy Notices at any time; please check back here regularly to review any changes.
3. The College holds a range of personal data about you, some of which you provide to the College directly and some of which is received from third parties.
4. Here are some examples of types of personal data the College holds:
 - 4.1. Personal details such as name, title, and date of birth.
 - 4.2. Your contact details such as address, telephone number, email address.
 - 4.3. Country of nationality and domicile.
 - 4.4. Current and prior educational experience and attainment.
 - 4.5. Immigration information (such as passport details and language proficiency) health information (including any disabilities) and other equality monitoring data you provide to us including any additional support needs you may have to successfully complete your programme.
 - 4.6. For apprentices, information about your career, workplace, employer and employment contract is held to adhere to ESFA funding rules.
5. In addition, if you come to study at the College, data stored and processed by the College will include:
 - 5.1. Academic performance.
 - 5.2. Attendance and progression.
 - 5.3. If relevant, breaches of the College's policies (such as academic or other misconduct concerning College activities) banking and payment information.

- 5.4. Appearance, voice and distinguishing features through recordings, filming video and photographs.
- 6. The College also processes contact and educational details after you stop being a student/apprentice here.
- 7. The College may also collect, store and use information about your health, ethnicity or religion for the purposes of statutory reporting it is legally required to undertake or should you require it to make reasonable adjustments for you during your visit to the College's or to make resources accessible.

HOW DOES THE COLLEGE USE THIS INFORMATION AND WHY

- 8. When you are an applicant, the College processes your personal data with the purpose of assessing your eligibility to be offered a place on an academic programme, including apprenticeships, and for identifying any support needs you may have.
- 9. If you accept a place on a programme and/or register as a student/apprentice at the College, the College processes your personal data for the purposes of providing its academic programmes and its related services.
- 10. In general, this applies to personal data you provide to the College to process your application and, if enrolled, to monitor academic performance. Without that information, the College would be unable to provide you with your chosen academic programme and its related services.
- 11. Some personal data is also required to fulfil the College's legal obligations regarding immigration. A failure to provide that information would interfere with your application for a UKVI Student Route visa.
- 12. Some personal data is also required to fulfil the College's legal obligations regarding reporting to regulatory bodies. A failure to provide that information could interfere with your application for student finance, or the College's designation as a registered body.
- 13. The College only processes data for specified purposes and when is justified in accordance with data protection law. The table below shows examples of personal data the College processes and the justification for doing so.

Purpose	Legal basis and justification
Assessing eligibility to undertake one of the College's educational programmes including apprenticeships	Processing is necessary for the purposes of preparing to enter into a contract with the College For apprenticeships, this information is also shared with employers and governing bodies (ESFA)
Provision of educational programmes and related	Processing is necessary for performing a contract to provide your chosen educational programme. This may

Purpose	Legal basis and justification
services (including IT and library services)	be a contract between you and the College or a contract between you and your sending institution, or for apprentices between you and your employer. This is called contractual necessity
Assessment of academic progress and performance (including attendance)	Contractual necessity
Occupational and apprenticeship progress	Contractual necessity for apprentice learners only
Administration of complaints, grievances and appeals	Contractual necessity
Immigration matters	<p>Necessary for the College to comply with its legal obligations concerning students or applicants who hold a Student Route visa. This processing may also be in the public interest, and your consent may be required in some cases</p> <p>If applicable for an apprentice learner, processing would also be required to adhere to eligibility regarding ESFA funding rules</p>
<p>Making reasonable adjustments for disabilities and providing relevant support to students or applicants with ill health</p> <p>For apprentice learners, communication of any reasonable adjustments with employers to ensure support is also available in the workplace</p>	Consent
Regulating the College's community (including dealing with misconduct under the College's procedures for academic and other misconduct)	Contractual necessity and the College's legitimate interest in maintaining academic standards
Obtaining payment of fees	Contractual necessity and the College's legitimate interest in securing payment for the services it provides

Purpose	Legal basis and justification
Additional payments for Apprentice Employers	Employer bank details are held due to a contractual necessity to transfer funds, where applicable, from training provider to employer
Protecting the College's property and assets (for example by dealing with misconduct)	Necessary for the College's legitimate interest in safeguarding its property and assets
Providing relevant IT and other facilities, for example, a virtual learning environment, as well as the development of new IT systems	Contractual necessity and the College's legitimate interest in providing proper facilities to support the provision of educational programmes and related support services
Communicating with applicants, students and apprentices	Contractual necessity
Communicating with prospective and active apprentices and their employers	Contractual necessity
Assisting applicants and students to obtain residential accommodation/housing	Consent
Careers and LAUNCH	Contact details, programme details and progression information where relevant to enable the opportunities offered by Careers and LAUNCH
Alumni relations	Necessary for the College's legitimate interests and by consent for marketing, fundraising and maintaining an alumni network
Audit Services	Necessary for the College's legitimate interests in maintaining internal controls, and/or preventing, detecting and investigating fraud
To provide references on request	Contractual necessity or where consent has been given
For use in the College's marketing materials and media to promote the College	The College's legitimate interest to process your personal data for the purposes of marketing and promotion

Purpose	Legal basis and justification
and its teaching, research and reputation	

14. There may be other processing in addition to the above, for example, when you access the College’s website which uses cookies, or when the College takes photos or video of our events and publishes them. This is done on the basis of our other policies, and the College will inform you about such processing at the time when the data is obtained or as soon as possible afterwards. Apprentice and employer information will also be processed through our Learner Management System Aptem and for the purpose of reporting to ESFA.
15. Where the basis of processing your personal data is a contractual necessity, and you don't provide the College with the personal data needed, the College may not be able to process your application or provide you with the programme for which you have applied.
16. A failure to provide immigration-related data may result in failure to obtain a Student Route visa for those students who require it.

WHAT INFORMATION DOES THE COLLEGE GET FROM THIRD PARTIES?

17. Sometimes the College receives your data from third parties. The following table lists what information the College may receive from them.

Data the College may receive	Source
Application data, which includes contact details, academic attainment, work experience, previous institution, contextual data and disability information	UCAS, Apprentice Employers
Your immigration status	Home Office (UKVI), Foreign and Commonwealth Office
Transcripts (full details of educational programmes undertaken at another institution, and your attainment in these)	Another institution and/or secondary schools, Learning Records Service, Functional and Initial Skills Assessment Provider (Apprentices only)
Medical, accessibility related and similar information, occupational health medical clearing (we only obtain this information from third parties if you give us consent to do so)	Another institution, medical practitioners and/or family members, Apprentice Employers

Your financial status	Student Loans Company
Details of any College associated complaint	Officer of the Independent Adjudicator
Details of performance in other educational institutions or in relevant jobs	Referees you have identified, Apprentice Employers
Information relating to criminal convictions	Disclosure and Barring Service
Accreditation information	Relevant professional accrediting bodies
Employment details and contracts	Apprentice Employers

WITH WHOM DOES THE COLLEGE SHARE INFORMATION?

18. Sometimes the College may need to share your data. The following table gives examples of this kind of data sharing.

Recipients	Data which we may share with them
College faculty	Contact details, attendance, progression, education, and attainment data. Where necessary for the provision of reasonable adjustments and/or of other support, and subject to your consent, health information
Professional staff	Contact details, immigration details, attendance, progression, education and attainment data. Where necessary for the provision of reasonable adjustments and/or of other support, and subject to your consent, health information
College's alumni team	Contact details, attendance and progression information
Employment or study placement providers	Your CV as well as any accessibility and assistance requirements and related information
Apprenticeship Employers	Personal information relating to conduct, performance and academic achievement plus progression of the apprenticeship programme

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Future employers	Personal information relating to conduct, performance and academic achievement, where the College is asked for a reference
University league table compilers, for example, <i>The Economist</i> , <i>Times</i> , <i>Guardian</i> and organisations compiling graduate destination data	Contact details and employment or further study destination data
Official bodies to which the College is obliged to report, for example HESA and the Office for Students, or their agents, ESFA, Ofsted, and the Department for Education	Information supplied as necessary to fulfil inspections or the College's reporting obligations to these bodies. This may include relevant special category data, the creation or maintenance of a Unique Learner Number (ULN), and a Personal Learning record (PLR)
External examiners	Exam papers
UK Home Office	Passport details, programme details and fees, and housing details
Senior Residents in Halls of Residence	Student details
Housing providers	Student details
Data processors (in other words third parties who process personal data on our behalf such as software providers)	Application details, attendance records
Local Authority	Contact details
Student Loans Company	Contact details
Research partners	Contact details, attendance and progression information
Regulatory and accrediting bodies, for example, SSU and SU	Contact details, attendance and progression information
Funding bodies, scholarship and bursary providers	Contact details, attendance and progression information
Government agencies, for example, HMRC (only upon request and where there is a legal basis for doing so)	Contact details

Police (only upon request and where there is a legal basis for doing so)	Information supplied as necessary to fulfil the College's legal obligations with respect to fire prevention, detection of crime, or safeguarding if applicable
Professional film-makers, photographers, design agencies, media suppliers, press	Your appearance, voice and distinguishing features through film and photography. The College may disclose your name and educational information, subject to consent

HOW LONG DOES THE COLLEGE KEEP YOUR DATA?

19. The College must retain some staff and student/apprentice personal data after they leave the College either because the law requires it or for other reasons, e.g. to provide transcripts and references or to keep tax records. Each type of data will be held for a set period, which is defined in the College's [Data Protection Policy](#).

THE DATA PROTECTION OFFICER

The College has appointed a Data Protection Officer. Their postal address is:

Data Protection Officer
New College of the Humanities
The Registry
Bedford Square
London
WC1B 3HH

QUESTIONS & COMPLAINTS

For more information on your rights, if you wish to exercise any right, for any questions, you may have or if you wish to make a complaint, please the Data Protection Officer.

Complaint to the Information Commissioner and/or Education & Skills Funding Agency's apprenticeship service helpline.

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which the College processes your personal data. You can make a complaint via the ICO website.

Apprentices and their employers may also escalate a query, concern or complaint about any aspect of their apprenticeship to the Education & Skills Funding Agency's apprenticeship service helpline.

Apprenticeship Service Support:

0800 150400

helpdesk@manage-apprenticeships.service.gov.uk

ESFA Complaints Policy

Title: Privacy Notice for Applicants, Students, Apprentices, Employers of Apprentices & Alumni					
Approved by: Executive Committee					
Version number	Date approved	Date published	Owner	Location	Proposed next review date
2.0	March 2021	April 2021	Data Protection Officer	NCH Academic Handbook/ policies and procedures/data protection	September 2022
1.5	September 2019	September 2019	Director of Marketing	NCH Academic Handbook/ policies and procedures/data protection	September 2020
1.4	May 2018	May 2018	Director of Marketing	NCH Academic Handbook/ policies and procedures/data protection	May 2019
Referenced documents	Data Protection Policy				
External Reference Point(s)	UK Quality Code Theme: Admissions, Recruitment and Widening Access; Information Commissioner's Office (ICO); UKVI Studnet Route visa				