

GENERAL PRIVACY NOTICE

Who we are

Bexhill College is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act 1998 (DPA) and the new General Data Protection Regulation 2018 (GDPR). In doing so, the College only collects, stores and processes personal information for legitimate purposes. This includes information disclosed when contacting the College as well as information we may learn during any engagement activity. This Privacy Notice explains how we do this as well as highlighting privacy rights, and how the law protects individuals.

Bexhill College is committed to keeping personal data safe and private and giving opportunity to update it as appropriate. The College will not sell or transfer personal data to a third party unless there is a legal requirement or a legitimate business need to do so.

What information do we hold about individuals?

This privacy notice applies to anyone who engages with the College in any capacity including visitors, parents, suppliers and contractors.

Information we collect

Personal data may be provided to the College when individuals visit the College or engage with us in any way. This information may include name, address, date of birth, contact information, gender, family details such as next of kin/childs details, any medical or support needs, and bank account information. On occasion, we may also collect sensitive information about ethnicity, disability, medical conditions and criminal offences which may be used by the College for the purposes of equal opportunities and to minimise risk.

Other information

We may also hold other information including previous contact information, records of applications for College related services previously requested or provided by the College, any information; advice or guidance provided or given by the College; records of meetings and any other information collected as part of any engagement with the College.

We may keep information contained in any correspondence by post, email or other electronic processes. We may record phone calls.

We may also obtain other information about an individual permitted by law from other sources, for example references for new suppliers.

Why do we collect this information?

We use this data for the the purposes of managing and operating the College. Such data is needed to enable us to:

- ✓ administer the College effectively;
- ✓ provide College services efficiently;
- ✓ maintain our own records and accounts;
- ✓ support teaching and learning effectively including effective pastoral care;
- ✓ to ensure the College is safe and secure
- ✓ administer applications for financial support e.g. student bursaries

This list is not exhaustive.

The lawful basis on which we use this information

We process this information on the basis of our legitimate interests:

- we have a legitimate interest in wishing to interact with an individual to manage and operate the College effectively and to ensure that the College is safe and secure for all persons visiting; and
- to be able to do so, we need to understand details of who is in the building, the reasons for this and to be able to communicate with them.

Where we are required by law to hold certain records, then we collect and hold those records to comply with that legal obligation.

Who might we share information with?

We will keep any personal information we hold confidential. We will only share the information when it is legitimate to do so. Depending on the reason for the engagement with the College, we may share information with government funding agencies (the Education and Skills Funding Agency, the Office for Students, the Student Loan Company) as well as the Local Authority (East Sussex County Council) in order to comply with our legal duties.

We may also share the information with other organisations for

- ✓ the purposes of administration;
- ✓ for the purposes of making payments;
- ✓ the provision of careers advice and other guidance;
- ✓ monitoring or statistical and research purposes;
- ✓ for other purposes related to the provision of education, training, employment and individual well-being. This will only take place where the sharing is compliant with the Data Protection Act 1998 and the GDPR 2018.

This list is not exhaustive.

We may be asked to share data with other third parties where there is a lawful reason for their request. These may include: the police, social services, legal firms acting on an individuals or the College's behalf, insurance companies acting on a individuals or the College's behalf or other government agencies.

We will not share details with any other third party including commercial companies without consent to do so.

The College will always ask permission to share sensitive information with other organisations unless required to do so by law.

Marketing

On occasion, we may need to publicise visitors who attend the College for example, when external speakers contribute to events for students. The College will seek permission to use any personal information including photographs and videos for any marketing purposes such as press releases, on our website, advertisements, in the prospectus or other publications or any other publicity material or methods including social media.

Use of the website

Wherever possible, we aim to obtain explicit consent to process information gleaned from use of the College website, for example, by asking a user to agree to our use of cookies.

Sometimes implicit consent may be given by an individual, such as when an email message is sent to which the sender would reasonably expect us to reply.

Except where an individual has consented to our use of their information for a specific purpose, we do not use information in any way that would identify an individual personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

CCTV

The College has CCTV in operation on all College premises both inside the buildings and in the grounds. Number plate recognition software is also used as part of the parking and CCTV monitoring system in the main College car park. This is used to enhance the security of the college environment including:

- ✓ the prevention, investigation and detection of crime including anti-social behaviour
- ✓ the apprehension, discipline and prosecution of offenders – including the use of images as evidence in disciplinary and criminal proceedings
- ✓ safeguarding students, staff, other College users and the public, ensuring their safety
- ✓ monitoring the security of the College site
- ✓ monitoring the use and security of the car park

Disclosure of recorded images to third parties may be authorised where the release is fair to the individual, there is a legal obligation to do so or release is consistent with the purpose for which the system was established.

IT systems

The College employs a range of monitoring software and regularly monitors the use of IT, including internet and email use through user names and logins to ensure adherence to the Acceptable Use Policy or for statistical purposes. All users should ensure they are familiar with these expectations and operate within them whilst on site or using College resources either during or outside College hours.

Automated decisions and personal information

We do not make automated decisions using personal data.

Transfer of personal data outside of the European Economic Area (EEA)

We do not transfer personal data outside the EEA.

How long do we keep this information?

We keep information in accordance with our document retention policy. Retention periods are in line with the length of time we need to keep personal information in order to manage and administer our business and handle any future information issues. They also take into account our need to meet any legal, statutory and regulatory obligations. These reasons can vary from one piece of information to the next. In all cases, our need to use specific personal information will be reassessed on a regular basis and information which is no longer required will be disposed of.

Letting us know that personal information is incorrect

Individuals have the right to question any personal information the College holds about them if they think it is wrong, inaccurate or incomplete.

How can I access the information held about me?

Under Data Protection legislation, an individual has the right to request access to particular personal data that we hold about them. This is referred to as a Subject Access Request. We will respond within one month from the point of receiving the request and all necessary information.

Individuals can make a Subject Access Request by completing and submitting the request form or by emailing it to dataprotection@bexhillcollege.ac.uk.

Individuals also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed

Can an individual withhold my personal information or withdraw consent to hold and process my personal information?

We may need to collect personal information by law, or under the terms of a contract we have with an individual. If this personal information is not provided, or consent to us holding or processing personal information is withdrawn, it may delay or prevent us from meeting our obligations in the capacity in which any engagement with the College is being undertaken. It may also mean that we cannot perform services needed to engage with that individual.

What if an individual want us to stop using their personal information?

Individuals have the right to object to our use of their personal information, or to ask us to delete, remove, or stop using their personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use the data. But individuals are able to tell us if there they think there is a reason why we should not be using it.

We may sometimes be able to restrict the use of certain personal data. This means that it can only be used for certain things, to exercise legal rights. In this situation, we would not use or share such information in other ways while it is restricted. If an individual wants to object to how we use their personal information, or ask us to delete it or restrict how we use it or, they should contact the college Data Protection Officer as outlined below.

Who can I contact if I have any questions or concerns?

Please write to the Data Protection Officer at Bexhill College, Penland Road, Bexhill on Sea, East Sussex TN40 2JG or email dataprotection@bexhillcollege.ac.uk. with any questions or queries which are not answered by this Privacy Policy, or potential concerns about how we may use the personal data we hold,

If a concern or complaint is not satisfactorily resolved and there is reason to believe we are processing personal data without legitimate reason, individuals have the right to complain to

the Information Commissioner's Office (ICO). The complaint form is available on their website <https://ico.org.uk/concerns>

Policy changes

This Privacy Policy is regularly reviewed by the Senior Leadership Team. This is to make sure that we continue to meet the highest standards and to protect privacy. We reserve the right at all times, to update, modify or amend this Policy.

The latest version of this policy can be found at on the College's website.

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