



# FAIR PROCESSING NOTICE

## FPN

London School of Academics is a provider of higher education therefore are legally obligated to provide information to the Department of Business, Innovation and Skills and Higher Education Funding Council for England who need it to carry out public functions assigned to them. Information includes personal data and sensitive data.

This Fair Processing Notice is to inform learners of the nature of the information London School of Academics collect, how their information is processed (how it is stored, how it is used and how it is shared) and how London School of Academics complies with the Data Protection Act 1998.

## NATURE OF INFORMATION

Under the Data Protection Act 1998 data is information which is processed by computers and other electronic equipment, recorded for processing purposes, recorded to form part of the relevant filing system, information which forms part of an accessible record and recorded information held by a public authority.

Personal data is information which relates to a living individual who can be identified from information or information in the possession or is likely to be in the possession of a data controller.

Chapter 29, Part 1, Section 2 states that “sensitive personal data means personal data consisting of information as to—

- (a) The racial or ethnic origin of the data subject,
- (b) His political opinions,
- (c) His religious beliefs or other beliefs of a similar nature,
- (d) Whether he is a member of a trade union (within the meaning of the [MI](#)Trade Union and Labour Relations (Consolidation) Act 1992),
- (e) His physical or mental health or condition,
- (f) His sexual life,
- (g) The commission or alleged commission by him of any offence, or
- (h) Any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings”.



A data controller is someone who determines the purpose and manner personal data is processed or is to be processed. The Director of London School of Academics is the Data Controller.

London School of Academics will collect data from all potential learners, current learners and former learners as part of admission, enrolment, progress on courses and for our Alumni database. The nature of the Data that we will collect includes:

- Full name
- Contact details
- Date of birth
- Nationality
- Ethnic origins
- Academic background
- Academic qualifications
- Disabilities
- Medical information
- A printed photograph of you to place on your enrolment form
- A digital photograph taken by CEME Campus security for your learner ID access card

## DATA PROTECTION

London School of Academics collects, stores and uses data which means we are legally obligated to act in line with the eight principles set out in the Data Protection Act 1998. The Data Protection Act 1998 states (Chapter 29, Schedule 1, part 1) the following as it's eight principles:

1. Personal data shall be processed fairly and lawfully. Consent should be obtained from the data subject with regard to processing unless the processing is necessary for compliance with legal obligations.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.



6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

All data collected and processed will be in line with the above principles, London School of Academics train our staff on data protection and put in place a number of measures to keep it safe and secure, these include:

- Limiting access to data; only those that need it for work purposes have access to it
- Data whether printed or in electronic form is only shared formally
- Data is not shared verbally with unauthorised persons or in an environment where it could be overheard or shared by others through hearsay.
- Data is kept secure through following the procedures and guidance set out in our Data Protection policy.
- All computer systems have passwords which are kept safe.
- Personal data is not disclosed to persons who are unauthorised, this includes internally and externally. For example, with learners, colleagues (who need not know), family, friends or others.
- Data is updated and reviewed regularly, where it is no longer required it is shredded or permanently deleted.
- London School of Academics provides awareness of data protection through training.

## THE INTENDED PURPOSES FOR WHICH DATA COLLECTED IS TO BE PROCESSED

All data collected will be done so with an intended purpose/s, which will be communicated, this can include for (non-exhaustive list):

- Admissions
- Enrolment



- Record academic achievement
- Pastoral and welfare support
- Administer finance
- Statics
- Disciplinary purposes
- Security purposes
- Internal and external quality assurance
- Alumni

Prior to enrolment information will be collected with your consent through the completion of an enrolment form and during an interview. After enrolling as a learner you will be consenting to London School of Academics collecting and processing data. All data collected and processed will be for purposes relating to your studies or other reasons which are legitimate, including where you opt in to Alumni.

### THIRD PARTY SHARING

London School of Academics are obligated to share data collected with public bodies, this includes Department of Innovation and Skills, Higher Education Funding Council for England and Student Finance England. Data can include both personal and sensitive data, the HESA Student Collection Notice section below should be read as it will give more information on the purpose for which information received will be used.

### HESA STUDENT COLLECTION NOTICE

The following is a complete, unamended text of the relevant HESA Collection Notice which can be accessed in addition to below by using this link: <https://www.hesa.ac.uk/content/view/141>

### STUDENT AND LEAVER SURVEYS

Your contact details may be passed to survey contractors to carry out the [National Student Survey](#) (NSS) and surveys of student finances, on behalf of some of the organisations listed below under Purpose 1. These organisations and their contractors will use your details only for that purpose, and will then delete them.

After you graduate we may contact you to ask you to complete one or more surveys into the outcomes of higher education and your activities after graduation. These surveys may be



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undertaken by us or by another specialist organisation contracted for that purpose. If a specialist organisation is used that organisation will receive your contact details, but will only use your details for the purpose of asking you to complete the survey, and will then delete them. You may also be contacted as part of an audit to check that we or any contracted organisation have undertaken these surveys properly.

If you do not want to take part in any of these surveys, please let us know.

## **SUBMISSION OF YOUR INFORMATION TO THE HIGHER EDUCATION STATISTICS AGENCY (HESA) [1]**

Every year we will send some of the information we hold about you to HESA (“your HESA information”). HESA is the official source of data about UK universities, higher education colleges, alternative HE providers, and recognised higher education courses taught at further education institutions in Wales [www.hesa.ac.uk](http://www.hesa.ac.uk). HESA collects, and is responsible for, the database in which your HESA information is stored. HESA is a registered charity and operates on a not-for-profit basis. HESA uses your HESA information itself for its own purposes. HESA also shares information from your HESA information with third parties. It may charge other organisations to whom it provides services and data. HESA's use of your HESA information may include linking information from it to other information, as described further below. HESA information is retained indefinitely by HESA for statistical research purposes. All uses of HESA information must comply with the Data Protection Act 1998 [www.legislation.gov.uk/ukpga/1998/29/contents](http://www.legislation.gov.uk/ukpga/1998/29/contents).

### **Sensitive information**

If you give us information about your disability status, ethnicity, sexual orientation, gender reassignment or religion these may be included in your HESA information and used to assist with monitoring equality of opportunity and eliminating unlawful discrimination in accordance with the Equality Act. Some other sensitive information is used to enable research into the provision of fair access to higher education, for example information as to whether you are a care leaver.

If you are enrolled at a higher education provider in England regulated by the Higher Education Funding Council for England your HESA information will include details of any financial support you may receive from us.

Your sensitive information will not be used to make decisions about you.

## **PURPOSES FOR COLLECTING YOUR HESA INFORMATION**

Your HESA information including linked data is used for four broad purposes:

### **Purpose 1 - Public functions**

#### **Education statistics and data**



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Your HESA information is used by some organisations to help carry out public functions connected with education in the UK. These organisations are data controllers in common of your HESA information under the terms of the Data Protection Act (this link explains what this means [ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/](https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/) ). Such organisations may include:

- Department for Business, Innovation and Skills
- Welsh Government
- Scottish Government
- Department for the Economy, Northern Ireland
- Higher Education Funding Council for England
- Higher Education Funding Council for Wales
- Scottish Further and Higher Education Funding Council
- Department for Education
- Research Councils
- Education Funding Agency
- Skills Funding Agency
- National College for Teaching and Leadership
- National Health Service bodies and organisations working with them e.g. Health Education England
- General Medical Council
- Office For Fair Access
- Quality Assurance Agency for Higher Education

and any successor bodies. These bodies may retain HESA information indefinitely for statistical research purposes, or for fixed terms depending on the terms of their data sharing agreements with HESA.

### **Other uses**

Your HESA information may also be used by some organisations who are also data controllers in common to help carry out public functions that are not connected with education. Such uses may include the following:

- Measurement of population levels and migration by the Office for National Statistics, National Records of Scotland and the Northern Ireland Statistics and Research Agency
- Monitoring of public expenditure by the National Audit Office
- Monitoring of the accuracy of electoral registers by Electoral Registration Officials.

### **Purpose 2 - Administrative uses**

**Fraud detection and prevention** - Your HESA information may be used to audit claims to public funding and student finance, and to detect and prevent fraud.



**Previous study** - If you are enrolled at a higher education provider in England: The Higher Education Funding Council for England (HEFCE) may share your previous education records with us, including HESA information submitted by other institutions, to determine the nature of any prior higher education study, including your current qualifications. This may be used to make decisions about the fees you are required to pay, the support available to you or the availability of a place for you to study with us.

**Your HESA information will not be used to make decisions about you other than for those uses outlined under Purpose 2.**

### **Purpose 3 - HESA publications**

HESA uses your HESA information to produce and publish information and statistics. This includes some National Statistics publications ([www.statisticsauthority.gov.uk/national-statistician/types-of-official-statistics](http://www.statisticsauthority.gov.uk/national-statistician/types-of-official-statistics)) and online business intelligence and research services. HESA will take precautions to ensure that individuals are not identified from any information which is processed for Purpose 3.

### **Purpose 4 - Equal opportunity, research, journalism and other processing in which there is a legitimate interest**

HESA and the other data controllers in common (see Purpose 1) may also supply information to third parties where there is a legitimate interest in doing so. Examples of use for this purpose include:

- Equal opportunities monitoring
- Research - This may be academic research, commercial research or other statistical research where this is in the public interest
- Journalism - Where the relevant publication would be in the public interest e.g. league tables
- Provision of information to students and prospective students

Users to whom information may be supplied for Purpose 4 include:

- Higher education sector bodies
- Higher education providers
- Academic researchers and students
- Commercial organisations (e.g. recruitment firms, housing providers, graduate employers)
- Unions
- Non-governmental organisations and charities
- Local, regional and national government bodies
- Journalists

Information supplied by HESA to third parties within Purpose 4 is supplied under contracts which require that individuals shall not be identified from the supplied information. A copy of



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HESA's current agreement for the supply of information is available at [www.hesa.ac.uk/bds-details#e](http://www.hesa.ac.uk/bds-details#e).

HESA student information may be linked to school and/or further education college information and supplied to researchers. A copy of the Agreement for the supply of linked data about pupils from schools in England is available at [www.gov.uk/government/collections/national-pupil-database](http://www.gov.uk/government/collections/national-pupil-database)

### **Linking of your HESA information to other information**

As indicated above, where HESA and organisations covered by Purpose 1 use HESA information this may include linking HESA information to other information for example:

- UCAS data
- National Student Survey data
- School and Further Education data
- Student Loans Company data
- Qualification Awarding Bodies data
- Tax, Benefits, and Employment data. (Guidance on the use of HESA records matched to Tax, Benefits and Employment data is available at: [www.gov.uk/government/publications/longitudinal-education-outcomes-study-how-we-use-and-share-data](http://www.gov.uk/government/publications/longitudinal-education-outcomes-study-how-we-use-and-share-data))

Where HESA provides information from your HESA information to third parties under Purpose 4, the permitted uses of the information by a third party may include linking HESA information to other information held by the third party. Permission for such use is considered on a case by case basis. It is only given where the linking is for the purposes outlined in Purpose 4 and subject to the requirement not to carry out linking to identify individuals.

Destinations information for schools and colleges – If you attended a school or college in England linked data may be disclosed to the last school or college you attended (or its successor body) and to Ofsted to enable them to assess the outcomes of secondary education.

### **THE HESA INITIAL TEACHER TRAINING RECORD (“ITT”)**

If you are on an ITT or EYITT course at a higher education provider in England, HESA will collect additional information about you and provide this to The National College for Teaching and Leadership (NCTL).

ITT or EYITT courses are those that lead to Qualified Teacher Status (QTS) or Early Years Teacher Status (EYTS)

NCTL is an executive agency of the Department for Education (DfE) and for the purposes of the Data Protection Act 1998 DfE and HESA are data controllers in common of the ITT record. NCTL will process your personal data for the administration and monitoring of initial teacher training schemes, including the allocation of teacher reference numbers (TRNs). NCTL will contact you to provide confirmation of your TRN and any subsequent award of qualified teacher





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status. NCTL may share personal data with us, its partners and contractors, including employers, employment agencies, Ofsted, Capita Teachers' Pensions and the Department for Business, Innovation and Skills (BIS), for this purpose and may link it to other sources of information about you.

### **ABOUT THE HESA STUDENT COLLECTION NOTICE**

The HESA Student Collection Notice is regularly reviewed. The most up to date version can be found at [www.hesa.ac.uk/fpn](http://www.hesa.ac.uk/fpn). Minor updates to the Student Collection Notice (including organisation name changes and clarification of previously specified purposes) may be made at any time. Major updates (such as a new purpose or administrative use) will be made no more than once per year.

### **YOUR RIGHTS**

For further information about data protection and your HESA information please see [www.hesa.ac.uk/dataprot](http://www.hesa.ac.uk/dataprot). If you have questions about how your HESA information is used please contact [data.protection@hesa.ac.uk](mailto:data.protection@hesa.ac.uk). Under the Data Protection Act 1998 you have rights of access to the information HESA holds about you. You will have to pay a small fee for this. If you think there is a problem with the way HESA are handling your data you have the right to complain to the Information Commissioner's Office: [ico.org.uk/](http://ico.org.uk/).

### **DATA SUBJECT REQUEST FOR INFORMATION HELD ON THEM**

London School of Academics acknowledges the rights of data subjects to request information. All individuals who are the subject of personal data held by the college are entitled to make requests for information and they are entitled to:

- ask about what information London School of Academics holds on them and the reason for this
- ask about how to gain access to the information held on them
- ask how London School of Academics is meeting data protection obligations

All data subject requests from individuals must be addressed to Sheila Singh ([sheila@londonschoolofacademics.com](mailto:sheila@londonschoolofacademics.com)) through email. A charge of £10 will apply to all data subject requests. All paid data subject requests will be dealt with and a response can be expected within 14 working days.

Information will only be given to the individual making the request after verification, proof of identity must be shown through a valid passport or valid driving license.



## CIRCUMSTANCES WHERE DATA IS DISCLOSED WITHOUT CONSENT

In accordance with the Data Protection Act 1998 personal data can be disclosed to law enforcement without consent from the data subject. The data controller will pass on the request for data to the Director of the college who will ensure that the request for personal data is legitimate before disclosing it. London School of Academics where there is a legitimate request under these circumstances will disclose data.

### Notice details:

Notice drafted by Soni Singh (Curriculum Manager) and Charlotte Saunders (Student Welfare Officer)

Notice approved by Sheila Singh (Managing Director)

Notice updated and Operational from the 29<sup>th</sup> of June 2016