



LONDON SCHOOL
OF SCIENCE & TECHNOLOGY

DATA PROTECTION POLICY (STUDENTS)

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1 Introduction

- 1.1 As a centre for education, much of the College's work is concerned with information and its use. For both educational and administrative purposes, a lot of this information will relate to living persons – it is their personal data. LSST needs to collect and keep personal data about its students to allow it to operate effectively and efficiently, for example to register students, monitor performance, to assure health and safety and to monitor equal opportunities.
- 1.2 To comply with the law, such personal data must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The principles to ensure that personal data is processed properly, and which the College follow to ensure it complies with the legislation, are set out in the General Data Protection Regulations (the GDPR), available on the Information Commissioner's Office website (www.ico.gov.uk).

Under the GDPR, personal data shall:

- 1.2.1 be processed fairly and lawfully
- 1.2.2 be obtained for a stated purpose(s) and not processed for anything other than the stated purpose(s) and for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes
- 1.2.3 be adequate, relevant and not excessive for the purpose for which it was obtained
- 1.2.4 be accurate and be kept up to date, and if inaccurate be rectified or erased without delay
- 1.2.5 except where anonymised so that the individual cannot be identified, shall not be kept for longer than is necessary for the purpose for which it was obtained
- 1.2.6 processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
- 1.3 LSST will ensure that these principles are followed at all times. Therefore, through appropriate management and strict application of criteria and controls, LSST will process your data only as set out in this policy and the LSST Privacy Notice.

2 Your rights

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access

- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Further information on how these rights can be found here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

3 How we use your Data

LSST may use and process personal data (including Special Category and criminal offence data) or information regarding you whilst you are a student of LSST and after you have left LSST. Special Category data includes information held by LSST as to your physical or mental health or condition, your racial/ethnic origin, sexual orientation/sex-life, political views, or religion. Criminal offence data includes information on the commission or alleged commission of any offence by you and any proceedings for an offence committed or alleged to have been committed by you (including the outcome or sentence in such proceedings).

We may obtain the following categories of personal data from third-parties:-

- Identifying data e.g. usernames, names, email addresses
- Tracking data e.g. attendance records taken by contractor lecturers
- Financial data e.g. payment and student finance data collected by contractor finance staff
- Medical and health e.g. sick notes
- Professional e.g. employer or past academic references, academic record information for SAPE
- Criminal e.g. enhanced DBS checks for health and social care courses

LSST processes your data, including Special Category Data for the purposes and in the manner set out in this Privacy Notice. The processing of your personal data for the below purposes is required for the performance of this contract between you and LSST, for LSST to meet its regulatory obligations to the QAA, and the OFS, and for LSST's legitimate interests including marketing, quality assurance, and ensuring safety and security of staff and students. We may also ask for your consent for participation in some marketing activities (e.g. subscribing to marketing information along with our newsletter). If so, you have the right to withdraw such consent at any time.

The purposes for which LSST may process your personal data (including Special Category data) include:

- the administration of your enrolment on and participation on a course, including the administration of examinations, the issue of results and certificates in connection with the course and (where applicable) the provision to your employer or other sponsor/corporate sponsor information about your attendance and performance on a course, and DBS checking where required for a course;
- the provision of LSST services and facilities to you and the protection of your health, safety and welfare whilst at LSST;
- the issue and operation of LSST's ID card in accordance with Condition 10.3.4 of the Student enrolment terms and conditions;

- the collection of tuition fees and other LSST fees;
- equal opportunities monitoring;
- arrangement and marketing of alumni activities;
- the provision of references about you;
- the provision of information to any regulator, government body or agency;
- for safety purposes; and
- the provision of information to the Higher Education Statistics Agency (HESA)

Your HESA information including linked data is used for four broad purposes: public functions, administrative uses, HESA publications and Equal opportunity, research, journalism and other processing in which there is a legitimate interest. For more information see the HESA Collection Notice on <http://www.hesa.ac.uk/fpn>

In some circumstances, it may be necessary for LSST to transfer your personal data to a country outside the European Economic Area (for example, if that is your country of origin). Such a transfer will only be made for the purposes specified above.

You should be aware that countries outside the EEA may not offer data protection law equivalent to that applicable in the United Kingdom and you consent to the transfer of data in these circumstances and for those purposes. Where we make such a transfer to a country that does not provide the same level of data protection as the UK, we will put appropriate measures in place to ensure your information is protected.

In some circumstances your personal data will be processed by a third party on our behalf – e.g. a work placement provider, a student recruitment agency, or contractor lecturing or administrative staff. Any such processing will only be done under a GDPR compliant processor contract requiring the third-party to only process the data in accordance with our written instructions.

LSST collects, processes, and stores criminal offence data about past convictions, including enhanced DBS check reports from APCS, details of unspent convictions, and full DBS certificates. This is required for performance of your contract of enrolment with the college on Health & Social Care courses, and the legitimate interest of protecting the safety of staff and students of the college. We do not keep a comprehensive record of criminal offence data.

Your data will be received by the following categories of third-party recipients:

- awarding bodies
- regulators and funding agencies
- debt recovery agencies instructed to recover outstanding fees
- contractor staff
- partner course and skill providers e.g. Careers Group, Learn Direct, Trainimaster
- professional advisors e.g. our accountants, solicitors, quality assurance consultants, our DPO
- public authorities and law enforcement e.g. HESA, the police, UKVI re your information is protected.

In some circumstances, LSST may wish to use data in the form of photographs, or video or audio recording, of classroom situations as part of general marketing materials for example in LSST's annual report, prospectus or course materials. Video and audio recordings and any personal data alongside them will only be used in this way with your explicit consent, which you have the right to withdraw at any time.

If LSST does not process your data fairly, you may lodge a complaint with the Information Commissioners Office (ICO) here: <https://ico.org.uk/concerns/handling/> within 3 months of your last contact concerning the matter with LSST (or such other time limit as the ICO from time to time specify).

4 Confidentiality

2.1 All information given to the College staff will be treated with sensitivity, care and discretion. In most circumstances, the information students provide is treated as confidential, but members of staff may discuss aspects of student enquiry or circumstances with their immediate colleagues or in a few cases where relevant, with the College management. If such discussions take place it will usually be for the sole purpose of seeking information, confirming the best course of action, or helping the member of staff to reflect on their work with you. Whenever possible, any such discussion between College staff will take place without identification of student personally.

5 Staff Responsibilities

5.1 Staff whose work involves the use of personal data are responsible for ensuring that:

- any personal data which they hold whether electronically or in hard copy is kept securely, including using password protection on computer files,
- personal data is not disclosed by them either orally or in writing, to any unauthorised third party,
- the personal data is accurate and kept up to date, held for the appropriate length of time and destroyed confidentially when/if no longer needed, and
- they do not access any personal data which is not necessary for carrying out their work.
- report any data breach to the DPO within 48 hours where feasible, to allow to the College to comply with its obligation to record all data breaches, and to report a data breach to the ICO within 72 hours.

5.2 Managers have an additional responsibility to ensure that their staff are aware of the data protection principles and know how to correctly process personal and sensitive personal data as part of their work.

6 Student Responsibilities

6.1 It is student's responsibility to inform LSST if their personal details require updating.

We will provide an annual opportunity for a student to check their data through the registration process.

We also collect, at registration, the contact details of a person nominated by student for emergency contact purposes. A student must notify them that we are holding this data which will only be used in an emergency.

7 Learners with disabilities or dyslexia

- 7.1 If a student has declared a disability or dyslexia, the College is legally required under the Equality Act 2010 to make appropriate and reasonable adjustments in order to help such student to participate to the fullest extent possible in the educational opportunities provided by the College. Information about the student situation and requirements will be limited to that necessary to assure that appropriate adjustments can be made to help the student gain maximum benefit from their course of study. Any information will normally only be passed to others with student's agreement.

8 Subject Access

- 8.1 Student is entitled to request a copy of the data we hold about him/her. Any person who wishes to exercise this right should complete the '*Subject Access Request*' form available from the Student Portal and submit it to the Registry, however a request can be made verbally or through any medium to any member of staff at LSST.
- 8.2 LSST will comply with requests for access to personal data as quickly as possible, but will ensure that it is provided within 28 calendar days of receipt of the request. LSST can extend the time to respond by a further two months if the request is complex or it has received a number of requests from the student. LSST will inform the student within 1 month of receiving their request and explain why the extension is necessary.
- 8.3 Requests made for exam results through a Subject Access Request prior to the publication date for the results, or clearly intended to compel release of the transcript of certificates themselves (for example where these have been withheld for failure to pay fees), the request will be treated as manifestly unfounded and will be refused. LSST will inform the student why where this is the case.

9 Retention of Records

- 9.1 Application data will be retained for 6 months from the date of the application if enrolment is not successful. We will retain a full student record for 6 (six) years after a student has left LSST so that we can fulfil our function of providing details of your education and references when asked to do so. After these six years, we will keep enough data about a student to be able to confirm the qualifications achieved whilst at LSST.

10 Key Contact Details

London School of Science and Technology Ltd (Data Controller)

LSST London/Elephant and Castle Campus
Lancaster House, 70 Newington, Causeway, London, SE1 6DF
Tel: 020 8017 4257

LSST London/Wembley Campus
First Floor, Alperton House, Bridgewater Road, Wembley, London, Middlesex HA0 1EH
Tel: 020 8795 3863

LSST Luton Campus
4 Dunstable Road, Luton, Bedfordshire, LU1 1DX
Tel: 015 8272 9486

LSST Birmingham Digbeth Campus
LSST Birmingham Campus
84 Bordesley Street, Birmingham, B5 5PN,
Tel: 012 1643 6774

LSST Birmingham Aston Campus
Crystal Court, Aston Cross Business Village,
Birmingham, B6 5RQ
Tel: 012 1643 6774

Email (all campuses): registry@lsst.ac

Gydeline (Data Protection Officer)

Gydeline Ltd
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