



Ulearn Privacy Notice

About this document

This privacy notice explains how Ulearn Education ("we", "our", "us") collects, uses and shares your personal data and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective users of Ulearn Education ("you", "your").

Ulearn Education is the data controller of your personal data and is subject to the Data Protection Act 1998 ("DPA") and, once in force, to the General Data Protection Regulation (the "GDPR").

How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your interest in studying at one of our partner universities;
- when you complete enrolment forms and when you complete other admission processes and procedures through Ulearn Education;
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
- from third parties, for example from your previous or current school, sixth form college, College or employers who may provide a reference about you or who may sponsor your studies and UCAS.

The types of information we collect

We may collect the following types of personal data about you:

- your name and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number sometimes) and your passport number or national identity card details, country of domicile and your nationality ;
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results;
- information about your family or personal circumstances and both academic and extra-curricular interests, for example where this is relevant to the assessment of your suitability to receive a bursary or in order to provide you with appropriate pastoral care;
- sensitive personal data and information about criminal convictions and offences, including:
 - information concerning your health and medical conditions (e.g. disability and dietary needs);

- certain criminal convictions (e.g. for students on Health related programs, following completion of an annual declaration of “good character”); and
- Information about your racial or ethnic origin; religion or similar beliefs and sexual orientation.

How we use information about our students

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

- recruitment and admissions;
- academic matters, including:
 - the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification, graduation);
 - maintaining student records;
 - assessing your eligibility for bursaries and scholarships, etc.
- providing library, IT and information services;
- non-academic matters in support of our core services, including:
 - providing student support services (e.g. through student welfare office, Disability and Additional Learning Support, Careers and Employability Support, Health and Safety Service, Accident reporting service, personal tutors and academic departments);
 - monitoring equal opportunities;
 - safeguarding and promoting the welfare of students;
 - ensuring students' safety and security;
 - managing classroom accommodation;
 - managing the use of social media;
 - managing car parking on campus;
- administering finance (e.g. fees, scholarships and bursaries);
- other administrative purposes, including:
 - carrying out research and statistical analysis;
 - carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
 - providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice);

- promoting our services (e.g. providing information about trips, visits or other events happening on and off campus);
- preventing and detecting crime;
- dealing with grievances and disciplinary actions;
- dealing with complaints and enquiries.

Graduation and degree information

Personal data (including award and classification) will be published in the award ceremony booklet. This information will also be passed to third parties involved in the ceremonies. All published details will be available on our archive and our website following the relevant graduation events.

You may withhold your consent to your name being published for these purposes when you register online to attend the award ceremony or graduate *in absentia*.

Award ceremonies are broadcast online and may be available to view online afterwards.

The basis for processing your information and how we use it

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you are enrolled as a student, as part of the admissions process (e.g. to send you a prospectus or answer enquiries about our courses);
- once you have enrolled, to provide you with the services as set out in our Student Agreement;
- to deal with any concerns or feedback you may have;
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

- to provide you with educational services which may not be set out in our Student Agreement but which are nevertheless a part of our academic and educational mission;
- to monitor and evaluate the performance and effectiveness of the college, including by training our staff or monitoring their performance;
- to maintain and improve the academic, corporate, financial, estate and human resource management of the College;
- to promote equality and diversity throughout the College;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- recovering money you owe to us;
- for fundraising purposes.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional);
- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

Sharing information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited personal data to a variety of recipients including:

- our employees, agents and contractors where there is a legitimate reason for their receiving the information, including:
 - third parties who work with us to provide student support services (e.g. counselling);
 - third parties who are contracted to provide out-of-hours IT services for us;
 - organisations operating anti-plagiarism software on our behalf (such as Turnitin)
 - internal and external auditors.
- those with an interest in tracking student progress and attendance, including:
 - student sponsors (e.g. the Student Loan Company, personal sponsors, NHS);
 - current or potential education providers (for example, where you take part in an exchange programme as part of your course);
 - current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance);
- professional and regulatory bodies (e.g. Pearson, Health Care and Professions Council etc.) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses;
- government departments and agencies where we have a statutory obligation to provide information (e.g. Office for Student, the Higher Education Statistics Agency (HESA), Quality Assurance Agency, the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes));

- where applicable, Ulearn Education can contact you to offer a pre-sessional or preparatory course relevant to your application to us;
- NHS trusts, NHS foundation trusts and Local Authorities (for the purpose of assessing whether you are entitled to free NHS hospital treatment);
- crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
- parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure);
- third parties conducting surveys, for example the National Student Survey.

International data transfers

Some of the personal data we process about you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

Fundraising and Alumni Relations

We pass certain of your personal data to our Alumni admin services when you graduate. This information will be used for alumni activities, including sending Ulearn Education publications, promotion of alumni benefits, services, events and programmes. Your personal data may also be used in fundraising programmes. We may also disclose limited personal data to our contractors for analysis in connection with fundraising activities.

If you do not want your personal data to be used for any of these purposes, please email: info@ulearn.education

Changes to your personal data

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. You can do this by completing change of circumstances form and send it to info@ulearn.education.

How long your information is kept

Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after your association with us has come to an end. However, some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes or for the purposes of supporting your lifelong relationship with Ulearn Education.

Your rights

Under the DPA you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications.

Once the GDPR comes into force on 25 May 2018, you will also have the following additional rights:

- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Data Protection Officer using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

Contact us

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection Officer by email: info@ulearn.education; by telephone: +44 (0)142 239 9451 or by post:

Data Protection Officer
The Elsie Whiteley Innovation Centre
Hopwood Lane , Halifax, HX1 5ER

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: www.ico.org.uk.