

#### **GDPR Students (prospective and current) Privacy Notice**

Group responsible:	Executive Team
EXT Member oversight:	Director of Finance and Administration
Individual responsible:	Jonathan Mead
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The **General Data Protection Regulation (GDPR)** protects the rights of individuals by setting out certain rules as to what organisations can and cannot do with information about people. A key element to this is the principle to process individuals' data lawfully and fairly. To meet the fairness part of this we provide you with information on how we process personal data.

LST's mission is to develop world-changing Christian leaders. LST uses the data to fulfil its educational mission and to engage with donors and stakeholders, raise funds and promote its activities in the marketplace.

The privacy and personal information security of our students is important to LST. Staff who process personal data have received data protection training. If you have any requests concerning your personal information or any other queries regarding this notice, please email LST Data protection officer Jonathan Mead: jonathan.mead@lst.ac.uk

#### How we collect your data?

In common with most Higher Education institutions, we primarily collect your personal data directly from you, from application forms, CVs or resumes, data obtained from your passport or other identity documents, or through the information you submit via the application portal or other relevant recruitment processes. We also ask for additional personal data during our enrolment process as we require additional information about you when you actually become a student. THe LST site automatically logs certain information about every request made of it. This information is used for system administration, for bug tracking, and for producing usage statistics. To collect the data, we will communicate with you via:

- email, Mailchimp, online Cognito forms, letter, telephone or text;
- communications will be sent to all registered students, including during any times of interruption of studies and to those students who have withdrawn.

On completion of your course this information is used by us to continue our relationship with you, as alumni (please see relevant privacy note).

# What personal data does LST collect?

Personal data from students is collected at various stages as you progress with your studies. The volume and nature of the personal data collected is outlined below:

- Details from application forms:
  - name and postal address;
  - o contact details (telephone number, email address);
  - age / date of birth;
  - o nationality and country of residence;
  - educational records to date;
  - o academic references (including personal statement and predictive grades);
  - religious and personal references;
  - disability declaration;
  - criminal conviction declaration.
- Further data collected at enrolment or updated during your time at the LST:
  - home address and next of kin;
  - term-time address;
  - entry and other qualifications;
  - demographic information;
  - funding, bursary and fee related information;
  - information needed to provide services in relation to disability, wellbeing or any other type of pastoral support;
  - course and stage details;
  - attendance, progress and current status;
  - assessment results;
  - photograph for identification badge;
  - for students undertaking courses in counselling additional requirements e.g. full occupational health check will be completed to allow a student to commence a placement.
- Data collected for statutory monitoring and reporting purposes:
  - religion/belief;
  - parental occupation and education;
  - sexual orientation;
  - ethnic origin;
  - gender identity;
  - sex assignment;
  - $\circ$  sexual orientation.
- Data collected from international students on a Tier 4 (or similar) visa to meet UK Visa and Immigration requirements:
  - passport details;
  - bank statements;
  - visa lifecycle details;
  - data to evidence attendance on course of study.

Additional personal data may be collected by the LST if relevant to placements, professional body requirements, extenuating circumstances applications, appeals/complaints/disciplinary cases and any further optional student services.

# How do we use your personal information?

We only process your data for the specific purposes, for example:

- to enable us to administer student-related functions from original applications through to graduation and to provide alumni services;
- to plan and account for the use of the services provided;
- to produce information including statistics for relevant external agencies such as the Higher Education Statistical Agency (HESA) and the Office for Students (OfS);
- to enable LST staff to communicate with students;
- to monitor academic progress over the period of enrolment towards completion of a qualification;
- to carry out assessment, authorise award of qualifications and verification of awarded qualifications post-study;
- to administer student related policies and procedures including appeals, complaints, academic misconduct and general conduct and discipline;
- to provide student support services, including financial, pastoral, sporting, employability and IT/learning resources;
- to issue communications on student benefits and opportunities and school activities or events organised for students;
- to comply with immigration compliance checks in relation to sponsored migrants;
- to ensure all eligible students have access to LST accommodation;
- to monitor, develop and update LST systems to ensure they continue to operate effectively and securely;
- to monitor equality and diversity objectives within the LST;
- to undertake surveys, market research and statistical analysis to improve the student experience.

# What legal basis do we have for processing your personal data?

- your consent
- legitimate interest
- contractual obligations
- legal obligation

LST has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. In some cases, the School needs to process data to ensure that it is complying with its legal obligations. For example, providing reasonable adjustments to enable an applicant with disabilities to attend the School.

# When do we share personal data?

LST is required to share personal data with certain other organisations to meet statutory requirements or to provide services to students. Sharing will always be undertaken in line with the requirements of data protection law, using the relevant legal basis as defined by the GDPR and other data protection legislation. The personal data that is actually shared will always be limited precisely to what the other organisation needs to meet its requirements or deliver its services. We review these third parties' privacy policies to check that they comply with GDPR.

The key partners with whom the LST shares periodically personal data with are:

- Professional and Funding Bodies:
  - validation of registrations and awards (e.g. Middlesex University);

- approval of funding applications;
- tutor groups.
- National/Local Government Departments and other public bodies for statutory reporting purposes:
  - Higher Education Statistics Agency (HESA) to produce a variety of statistical reports about higher education that are required to be published in the public interest;
  - the Office for Students (OfS);
  - UK Immigration agencies to ensure compliance with the conditions attached to student visas;
  - o the Student Loans Company in connection with grants, fees, loans and bursaries;
  - the courts, the police and other organisations with a crime prevention or law enforcement function (subject to meeting the conditions of relevant legislation);
  - local authorities for the purposes of assessing and collecting council tax.
- Other individuals / organisations:
  - external examiners for examinations and assessment boards;
  - housing providers for students;
  - o the Office Of The Independent Adjudicator to review student complaints;
  - employers who request a reference from the school (for relevant students);
  - IPSOS-MORI and JISC online surveys for inclusion in the National Student Survey (NSS), Postgraduate Taught Experience Survey (PTES) and the Postgraduate Research Experience Survey (PRES);
  - sharing your personal data with internal bodies such as Student Committee operates on opt-in principle.

# Where do we store and process personal data?

We store your data securely and treat it with sensitivity. All data is held on a database hosted on a secure server within the School's IT network or on our Student Information System (SIS) operated by Ellucian and hosted on a secure cloud based service provided by Amazon Web Services, both of which comply to their own rigorous global information security policies and practices in accordance with the GDPR legislation. Users access rights to the database are restricted according to individual job roles, so only relevant users see your data.

# How long do we keep your personal data for?

LST takes its obligations under the GDPR seriously by not holding onto personal data for any longer than is necessary. Further details of data retention timescales can be found in LST Data Retention Policy and Erasure Procedures. In some cases, there are good reasons as to why we need to retain data about students for a significant period of time, for example:

- in order that student awards can be verified in the long-term;
- to produce transcripts and references;
- for alumni services and ongoing relations with the school;
- for careers and employability services;
- to deal with complaints, appeals and disciplinary cases;
- for statutory reporting purposes and to complete statutory surveys such as the Destination of Leavers from Higher Education Surveys and Graduate Outcomes.

# Your rights in relation to personal data

Under the GDPR you have the following rights:

- be informed as to how we use your data (via this Notice);
- to obtain access to, and copies of, the personal data that we hold about you;

- ask us not to send you marketing communications;
- update, amend or rectify the data we hold about you;
- ask us to erase your personal data;
- change your communication preferences to restrict how we process your data;
- 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.

To exercise any of the above rights please get in contact with the LST Data protection officer at the address below:

Data Protection Officer London School of Theology Green Lane HA62UW Email: jonathan.mead@lst.ac.uk

You also have the right to complain to the UK Regulator the Information Commissioner's Office (ICO) if you believe you request has not been dealt with properly or you have a complaint to raise against the LST for any other data protection related issue. A complaint can be raised via the ICO's website (<u>https://ico.org.uk/make-a-complaint/</u>)

GDPR gives you right to withdraw consent from the processing of your personal data by LST at any time, you can opt-out by emailing: <a href="mailto:engagement@lst.ac.uk">engagement@lst.ac.uk</a> or by calling 01923456000 if you wish to withdraw your consent.

# Your responsibilities

All students who handle personal information of which the LST is responsible for must follow the requirements of the Data Protection Policy and other relevant guidance issued by the LST. We keep this policy under regular review. If we make any significant changes in the way we treat your personal information, we will make this clear on our website.