### How the College uses your personal information

General principles on how we manage personal information:

- We will take care to collect only such information from you as we need to be able to fulfil our statutory duties, to effectively record, monitor and accredit your learning, and to help keep you safe.
- We will only share your information with organisations where we either have a legal duty to do so, or it is in the interest of your studies or the College's quality of provision. We will be clear to you about who these organisations are.
- We will maintain a high level of IT system security in order to keep your information protected and safe.
- We will ensure that our staff understand and maintain their responsibilities in protecting personal information.

We are the data controller of personal information about you. We are Sparsholt College (incorporating Andover College). Our address is Westley Lane, Sparsholt, Winchester, Hampshire SO21 2NF.

Our Data Protection Officer is Scott Hermiston. If you have any questions about this policy or the ways in which we use your personal information, please contact our Data Protection Officer by mail at the above address, by email at <a href="mailto:data.protection@sparsholt.ac.uk">data.protection@sparsholt.ac.uk</a> or by telephone at 01962 673288.

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

Throughout this document, "Personal Information" refers to Personal and Sensitive information (special category). The two categories are separated where appropriate.

## **FINANCE - DEBTORS**

What would you like to know about?

- the information that you give us;
- the uses made of your personal and sensitive information;
- the legal basis on which we collect and use your personal and sensitive information;
- how long we keep your personal and sensitive information;
- how we share your personal and sensitive information;
- how we transfer your personal and sensitive information outside Europe;
- your rights over your personal and sensitive information.

## The information that you give us

If you are paying fees for tuition, assessment, registration, examinations, transport, residence on-campus, or for any other reason, the College will record any debts and/or transactions in our Finance records system. These are held separately and in addition to the information that we collect from you as a learner / student. In this document we will refer only to the Finance records – for further information about use of personal information in our student records please refer to the Privacy Data Statement for Learners document on our website. <a href="https://www.sparsholt.ac.uk/privacy-notice/">https://www.sparsholt.ac.uk/privacy-notice/</a>

#### **Personal**

Name, address, telephone number (home and/or mobile) and email address for the learner. In the case of a third party paying fees on behalf of a learner, name, address, telephone number and relationship to the learner concerned are also collected.

In the case of learners paying via a loan from the Student Loans Company, either for FE or HE courses, information about the loan is held, including SLC registration number, the qualification that the loan was taken to pay for, and course dates.

#### **Sensitive Personal**

Bank account details.

Items in this category we are very careful about maintaining privacy and ensuring data is only shared where there is a legal obligation to do so.

## The uses made of your personal and sensitive information

We only use the information you give us to assist in processing such payments as you have agreed to make at the point at which you completed and signed the Fees Payment Form.

# The legal basis on which we collect and use your personal and sensitive information

Generally, the information is collected and processed as part of our public interest task of providing education to you. Where that information is special category (sensitive) personal information (e.g. bank account details) we will process it with your consent.

# How long we keep your personal and sensitive information

Most records are maintained for the statutory minimum of 7 years. Records which have no audit standing will be deleted or destroyed in line with our retention schedule.

# How we share your personal and sensitive information

We may share the personal information that you give us or that we hold about you with the following organisations (or types of organisation) for the following purposes:

The Department for Education (including the Education and Skills Funding Agency, Ofsted and the Office for Students)

Details of fees paid by Further Education learners are not shared with funding bodies, with the exception of apprentices (where any contribution paid by the employer is shared), and learners paying their fees via an Advanced Learner Loan (where the fact of accessing a loan is shared).

Higher Education students studying in Further Education colleges have details of the tuition fees paid shared with the Education and Skills Funding Agency (ESFA) as a required part of their learner record. This record also includes details of loans taken from the Student Loans Company (SLC). The ESFA pass this data on to the Office for Students (OfS) and the Higher Education Statistics Agency (HESA) who have statutory responsibility for Higher Education in England.

From time to time, the UK government changes the way it organises education, and/or changes the names of the agencies which govern education in England. For this reason, the list of public education agencies that we will share your information with cannot be exhaustive, but we will only share your information with such agencies where there is a legal requirement for us to do so.

#### The Student Loans Company (SLC)

Under SLC rules, we must undertake matching and monitoring of activity that is paid for by either HE Student Loans or Advanced Learner Loans. This monitoring includes sharing information with the SLC about continued engagement on the qualification/course being studied on a regular basis.

#### **Internal and External Auditors**

The College is legally obliged to undergo internal and external audits of its finances, and as learners generate funding and/or fees, learner data is subject to audit. As part of this process, your information may be shared with the College's auditors if your record is selected by them as part of their audit sample. Audit firms must adhere to a set of guidelines prohibiting them from using your information for anything other than confirming that the College is accurately and correctly claiming funding and charging fees for your programme of learning.

#### Parents/Guardians

In the case of third parties paying fees on behalf of a College learner, information about any debts outstanding will be shared with the payee.

#### **Debt Collection Agencies**

In the case that a payee does not keep up with payments, their account may be passed to the College's debt collection agency.

## **Other External Organisations**

The College will not communicate or share your information with any other external bodies without first asking for your permission to do so.

# How we transfer your personal and sensitive information outside Europe

We do not store or transfer your personal data outside Europe.

# Your rights over your personal and sensitive information

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used please refer to the ICO's website for further information about this (https://ico.org.uk/);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machinereadable format.

These rights and some clarifications and explanations can be seen in our Data Protection Policy, available via our website.