

## **PRIVACY POLICY – BURSARY APPLICATIONS**

*The College is committed to the equality of opportunity and to a proactive approach to equality, which supports and encourages under-represented groups, promotes inclusivity and values diversity.*

### **1 Policy Statement**

This Privacy Policy applies to bursary applicants to Wyggeston and Queen Elizabeth College (the “College”) and is to help you understand how and why we collect and process your personal data, how we will use that data, the legal justification for using it and what rights you have over your data.

The College has a responsibility under the UK GDPR and the Data Protection Act 2018 to ensure the security and fair use of personal data. In order to award bursaries, we collect and process personal data relating to bursary applicants.

WQE and Regent College Group (University Road, Leicester, LE1 7RJ) is the data controller and is responsible for your personal data. The College is committed to being transparent about the data that it collects and uses and to meeting its data protection obligations. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the Data Protection Officer using the information set out in section 9.

### **2 What is ‘personal data’?**

‘Personal data’ includes any information that the College holds about you which identifies you. This includes:

- your name, date of birth and contact details;
- nationality;
- contact details of your parents/ guardian;
- household financial data and banking details provided by you and your parent/guardian at the time of application; and

sensitive personal data, such as:

- your race or ethnicity; and
- whether or not you have a disability or health condition.

### **3 How is your personal data collected and held?**

Your personal data may be collected through the following sources:

- any information disclosed by you on your bursary application form and
- general correspondence and administration between you and the College related to the processing of your bursary application.

We may also collect further information from you during the course of your studies in relation to your bursary application.

Your personal data is held in our College IT systems, and will be visible to the relevant College staff who are involved in administering bursary funds. We may also keep the paper copy of your application.

#### **4 How the College uses your personal data and why**

We use your personal data to assess your eligibility for bursary funds, and administer and pay your bursary.

##### ***Legal grounds for using your data***

The law requires the College to have a legal basis for collecting and using your personal data. This section describes the legal basis we rely on when processing your data. We rely on one or more of the following legal bases:

##### Public task

Your data will be processed under the public task basis, which means that we are using your data to enable us to perform a public task, i.e. administration and payment of your bursary.

##### Contractual necessity

We process your data where it is related to performance of the contract we are about to enter into with you (i.e. taking steps at your request before entering into the contract with us for the provision of a bursary in relation to our academic programmes). Where the basis of processing your personal data is a contractual necessity and you don't provide us with the personal data needed, the College may not be able to process your request or provide you with the service for which you have applied.

##### Consent

We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose. If you do consent, you can opt-out at a later date if you change your mind. We will stop processing your data at that point.

##### Legal obligation

We process your data where we need to comply with a legal obligation, such as ensuring that you are eligible for your bursary and that we comply with the relevant funding requirements.

##### Special category data

We may need to store sensitive data about you, known as 'special category data'. Special category data includes information about your ethnicity, and some medical information, such as information you disclose to us about disabilities which may require support during your application or during delivery of academic programmes. In addition to one of the lawful bases set out above, we will rely on one of the conditions of Article 9 of the UK GDPR to process your special category data. In this case, this will be your explicit consent, which you provide at the time of data collection with regard to your bursary application.

## **5 With whom does the College share your data?**

We need to share your data with external agencies to allow us to administer your bursary, for example the ESFA who provide this funding, and auditors working on their behalf.

We will share your banking details and payment amounts with our bank to allow them to make payments to you.

We will share the fact that you receive bursary with various data processing agencies to allow statistical analysis as compared to non-bursary students, but we will not share your financial details or bank details in this way.

Where we do share data, we will do so securely and only where we have confirmation from the recipient that they will process your data securely, fairly, and in line with the legislation.

We will not send your data outside of the UK and European Economic Area.

## **6 How long do we keep your data?**

We keep your information for as long as we need to in order to administer and pay your bursary, and to make sure that our legal obligations are met. Usually, we will keep your records for seven years after the end of the year in which you leave, although some records will be destroyed earlier where there is no good reason to keep them. Exact details are set out in our Data Retention Policy. If your bursary application is unsuccessful, your information will be destroyed at the end of the academic year in which you apply.

## **7 Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

## **8 Your data rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

- **Right to be informed**

The College will ensure you have sufficient information to ensure that you're happy about how and why we're handling your personal data, and that you know how to enforce your rights.

- **Right of access / right to data portability**

You have a right to see all the information the College holds about you (commonly known as a "data subject access request"). Where data is held electronically in a structured form, such as in a database, you have a right to receive that data in a common electronic format that allows you to supply that data to a third party - this is called "data portability". If you wish to exercise your right of access please email the Data Protection Officer on the contact details in section 9.

- **Right of rectification**

If we're holding data about you that is incorrect or incomplete, you have the right to have it corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Right to erasure**

You can ask that we delete your data and where this is appropriate we will take reasonable steps to do so. The right to erasure is a limited right, and we may not be able to agree to requests for erasure. If this occurs, we will explain why your request is not being actioned.

- **Right to restrict processing**

You can ask us to suspend the processing of your data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to process it.

- **Right to object**

You can object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Rights related to automated decision making including profiling**

If the College makes automated decisions about you, you have the right to ask for a human being to intervene on your behalf or to check a decision.

- **Right to withdraw consent**

Where we are relying on your consent to process your personal data or your explicit consent to process your special category data, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- **Right to transfer**

You have the right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format where possible.

If you wish to exercise any of your data rights or submit a data subject access request, please contact the DPO on the details set out in section 9 below.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

## **9 Data Protection Officer**

The College has an appointed Data Protection Officer.

They can be contacted by emailing: [DPO@wge.ac.uk](mailto:DPO@wge.ac.uk)

## **10 Further information, guidance and complaints**

If you need any further information about our use of your personal data, or if you have any concerns about how your data is being shared, please contact our Data Protection Officer in the first instance using the details set out above.

If you are unhappy about the way in which we have used your personal data, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues, by using the following link: [ico.org.uk/make-a-complaint/](https://ico.org.uk/make-a-complaint/).