

# Student Privacy Notice



## 1.0 Introduction

In this policy, the abbreviation of EDA will be used to cover all aspects of the Emil Dale Academy business that is affiliated with the full-time courses in any capacity.

### 1.1 Location of Policy

This policy is available to access on EDA's website.

### 1.2 To whom and where this policy applies

This policy applies to all students enrolled on a full-time course at EDA.

### 1.3 The context of this policy and its relationship to other policies

This policy should not be read in isolation as it links with many of EDA's other policies, including, but not limited to the:

- a. Information Handling Policy
- b. GDPR Policy

## 2.0 Policy

This privacy notice relates to your personal data as necessary for enrolment and studying the private sector hours at EDA. During your time at EDA, you may sign up to other services or programmes for which other privacy notices will apply, for example:

- a. Your enrolment at the University of Bedfordshire (if you are a three-year course student);
- b. Your enrolment at The Knights Templar School (if you are a two-year course student);
- c. A University of Bedfordshire society or social club (if you are a three-year course student);
- d. Counselling; and/or,
- e. Part-time employment.

### 2.1 Data collected or created and purpose

EDA processes personal information taken from:

- a. your application form,
- b. enrolment form,
- c. referees or other third parties supporting your application,
- d. information and documentation you provide in support of your application, and
- e. information collected or created during your time with us such as:
  - i. tuition notes and course progression,
  - ii. attendance record,
  - iii. your photograph,
  - iv. correspondence,
  - v. feedback and other comments,
  - vi. details of payments made and received or debts owed,

- vii. complaints,
- viii. enquiries, and
- ix. information you are required to provide such as:
  1. special requirements,
  2. health or diversity information, and
  3. marketing preferences.

We use this information to:

- f. provide your course and support your studies and welfare
- g. to verify your identity,
- h. maintain contact with you (by post, email and phone),
- i. offer additional related services and information,
- j. monitor and enforce the conditions of our agreement with you,
- k. to manage payments,
- l. for credit scoring and assessment,
- m. debt tracing,
- n. to manage your use of facilities (e.g. libraries) and participation at events,
- o. to support disciplinary, complaint, and quality assurance processes and arrangements,
- p. to fulfil our legal obligations,
- q. for internal and external auditing purposes, and
- r. to report on our activities and monitor diversity (this will be in an anonymised form).

We will also store the details of the emergency contacts you have provided in case we need to contact them.

CCTV images, card access data and data recording your interaction with EDA IT systems (including Wi-Fi and EDA email) are used to maintain the security of the academy, its staff, freelancers and students. In exceptional circumstances we may need to analyse your content to help us detect abuse such as spam, malware, and illegal activity.

Your personal data may be used for other purposes in accordance with an appropriate legal basis, for example with your consent or through other agreements you enter into during your time with us, which will be covered on separate privacy notices at the time.

## **2.2 GDPR legal bases for processing**

In most cases, information relating to you and your studies, including any support services provided and information created by your tutors or others during your studies, will be processed under the GDPR legal basis 6(1)b 'necessary for the performance of a contract'. Your enrolment and the student terms and conditions form the contract between you and EDA.

Where required by a UK law, processing may occur under basis 6(1)c 'necessary for compliance with a legal obligation'.

CCTV images, card access data and data recording your interaction with EDA IT systems - including your use of EDA email - will be processed under the basis 6(1)f 'legitimate interests' to maintain security for the college, its assets, freelancers, staff and students and to monitor the use of our premises and systems. Your photograph will also be used to help freelancers and other staff members identify you in classrooms and at events.

Marketing contact may sometimes be made under 6(1)f 'legitimate interests' if related to your studies, but otherwise will be with your consent. In either case you can withdraw consent or unsubscribe from direct marketing by clicking an 'unsubscribe' link or contacting the sender directly.

### **2.3 Special Category (Sensitive) Data**

GDPR 'special category' personal data includes:

- a. Information relating to disabilities, health or dietary requirements provided for the purposes of making reasonable adjustments
- b. Information relating to ethnicity, sexuality or religion for the purpose of statistical monitoring
- c. Information relating to financial status for the purposes of scholarship awards
  - i. This will only be required should a successful applicant/ EDA student apply for a scholarship

This type of data will normally be processed under the legal basis 9(2)a 'explicit consent' if you agree to provide it. You can withdraw consent at any time by contacting the department which collected it, in which case this data will be deleted. Please note that if scholarship applicants withdraw consent ahead of the Business, Compliance and Strategy Manager being able to review the application, this may affect the possibility of awarding a scholarship.

If provided, some special category data will be shared with the University of Bedfordshire or The Knights Templar School (course dependant) under basis 9(2)j 'processing is necessary for archiving...statistical purposes'. Special category data may also be processed under 9(2)c vital interests if necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent, or under 9(2)g substantial public interest if necessary for safeguarding children or vulnerable adults or provide counselling, where it is not practical or appropriate to obtain your consent.

Information relating to declared criminal convictions or any unspent criminal convictions will be collected under 9(2)g substantial public interest in order to identify potential threats to children and vulnerable adults.

### **2.4 Data storage, access and sharing with third parties**

Your data will be stored on EDA hosted systems and databases, which can be accessed by relevant staff and/or freelancers of the college. The employment status of the staff member or freelancer will affect what EDA hosted system and databases these persons will have/will not have access to. Your name and EDA email address will be made available to all staff, freelancers with EDA accounts, and students through the EDA internal online directory service.

We will sometimes need to share or provide access to your personal data with third parties who are engaged as data processors on our behalf. These may include course tutors or support staff working through their own company or organisations outside of EDA. Data will always be shared within the EEA, with a territory deemed adequate by the EU, or with appropriate safeguards in place in line with GDPR, unless you consent otherwise or enter into a separate agreement that covers the processing.

Under legal basis 6(1)f Legitimate Interests, we will share your name, course and contact details with the University of Bedfordshire or The Knights Templar School (course dependant) to facilitate automatic membership to its services, clubs, societies and events which are available to all students.

If you perform in a show during your time at EDA, your first name, surname, headshot, Spotlight information (course dependent) and performance credits may be printed in a program and may also appear on EDA social media channels. You must inform the EDA team in writing at [info@emildale.co.uk](mailto:info@emildale.co.uk) if you wish to opt out of this.

EDA may also share your data with third parties to fulfil a legal obligation or for other legal purposes.

Personal data may be shared with the appropriate authorities if necessary for the prevention or detection of crime, the apprehension of offenders, or the collection of taxes.

Other sharing of your information or storage outside of EDA will be covered in privacy notices at the point you sign up to the service or provide the information for that specific purpose, e.g. surveys, student support services.

## 2.5 Retention

After you graduate core student records will be kept permanently to provide references. Your core student record comprises of your title, official name, name used (if different), date of birth, student ID number, course and dates of study, transcript of results and award attained.

Your name and contact details will be retained after the end of your studies in order to provide alumni services and contact.

Personal data which relies on your consent as a legal basis will be deleted if you withdraw consent.

Other data will be removed either:

- a. Once you have turned 25 years old (if you studied on the two-year course), or;
- b. 6 years following your graduation from EDA (if you studied on the three-year or one-year course).

If, throughout your time training at EDA, you studied on multiple courses, the last course you trained on will determine how long your data is retained. Eg: if you trained on the two-year course and then continued to train on our three-year course, your data would be stored for a further 6 years following completion of your three-year course.

### Automated decision making and profiling

Your personal data will not be used for automated decision making or profiling without your consent.

Examples of some organisations and persons we share your personal data with include:

Type of data	Shared with	Purpose	GDPR legal basis
Course details, basic biographical data, full student details	University of Bedfordshire, The Knights Templar School (course dependant)	Statistical reporting, to facilitate awarding qualifications (where applicable)	6(1)b Performance of a Contract

Name, headshot image	Teaching staff and freelancers	To allow teaching staff and freelancers to address students individually	6(1)f Legitimate Interests
Basic identifying details and attendance status	Student loans company (course dependant), fee payers	To confirm attendance or non-attendance	6(1)e Necessary for a task in the public interest (the proper administration of student funding support)
ID, passport, visa, attendance and award details	UK Visas and Immigration	To confirm immigration status – overseas students only	6(1)c Legal Obligation
Login Details, course notes, comments, voice, images, etc	Microsoft Teams etc (all using EU Standard Contractual Clauses)	To facilitate course collaboration	6(1)b Performance of a Contract
Sensitive (special category) data	University of Bedfordshire, The Knights Templar School (course dependant), student's emergency contact(s)	To aid in the wellbeing of students	6(1)f Legitimate Interests  * This is only in circumstances where EDA believe contacting these organisations or individuals will be for the benefit of the student

### Document Review

Version Number	Date of Issue	Review Date	Author	Changes Made/ detail
01	24 <sup>th</sup> May 2022	May 2023	Eden Tinsey	First issue
02	20 <sup>th</sup> July 2022	July 2023	Eden Tinsey	Annual policy review
03	18 <sup>th</sup> August 2023	July 2024	Eden Tinsey	Annual policy review  Adaptations made to Section 2.3  Additions made to Section 2.4