

# **Privacy Policy for Students**

## 1. Introduction

At Oxford Media & Business School we take our responsibilities as a data controller seriously and we are committed to using the personal data we hold in accordance with the law.

This privacy policy provides detailed information about how we obtain, gather, use, process and discard personal data.

If you have questions regarding our privacy policy, your personal data or its use, please contact us at <u>courses@oxfordbusiness.co.uk</u> or write to us at 1 Cambridge Terrace, Southern House, Oxford OX1 1RR.

## 2. The type of personal data we process

We process personal data about prospective, current and past students and their parents, staff, suppliers and contractors and other individuals connected to or visiting the college.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers, email addresses and other contact details
- family details
- medical information (including any learning disabilities or other medical conditions)
- enrolment, academic, disciplinary and other education related records, information about special educational needs and references
- education and employment data
- images, audio and video recordings
- financial information
- courses, meetings or events attended

As a college, we need to process special category personal data (e.g. concerning health) and criminal records information about some individuals (particularly staff). We do so in accordance with applicable law (with respect to safeguarding or employment) or by explicit consent.

## 3. Collection of personal data

We collect most of the personal data we process directly from the individual concerned (or in the case of students, from their parents). In some cases, we collect data from third parties (for example, referees, previous schools) or from publicly available resources. Any third party information is obtained with consent from the individual in question.

Where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry.

#### Visitors to our website

We will treat all your Personal Information as confidential. We will keep it on a secure server and we will fully comply with all applicable Data Protection and consumer legislation. The server OMBS uses to store this information is accessible to authorised staff only, is further connected to the internet through a firewall and is therefore not accessible to the public.

When you submit an enquiry or make an application on our website <u>www.oxfordbusiness.co.uk</u> we will ask you to input and we will collect personal information from you such as your name, email address, address and telephone number or other information.

#### **Google Analytics**

We use Google Analytics to monitor traffic on our website, this allows us to measure the quantity of visitors to a particular section of the site and report on overall site performance by considering a number of metrics. While Google Analytics enables us to report on the number of visitors to the site, it does not allow us to identify users directly.

We do not use cookies on our website.

#### People who email us

If you email us making a request for course information, we will collect your name, email address and the contents of your email.

#### People who telephone us

If you call us making a request for course information, we will collect the information that we need from you in order to answer your query or deliver the product and services you have requested.

#### People who we meet at Career Fairs or marketing events

If you speak to a member of the OMBS team at an event and chose to opt in about our Professional Business Diploma course we will collect your name and email address, and school details.

#### People who make a complaint to us

When we receive a complaint we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

#### 4. Handling and sharing of personal data

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to OMBS systems. We do not transfer personal data outside of the EEA.

Some of our systems are provided by third parties, e.g. the OMBS website. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

We do not share or sell personal data to other organisations for their own purposes.

## 5. Why we process personal data

OMBS processes personal data for:

- The selection and enrolment of students
- The provision of teaching students including the administration of the curriculum and timetable
- Monitoring student progress and educational needs and reporting these internally and to parents
- Providing references for students (including after a student has left)
- The provision of educational support and related services to students (and parents) including the maintenance of discipline, provision of OMBS's IT and communications system in accordance with our IT policies
- The safeguarding of students' welfare
- The research into and development of effective teaching and learning methods and best practice
- Compliance with legislation and regulation including the preparation of information for inspections
- Operational management including the compilation of student records, the administration
  of invoices, fees and accounts, the management of OMBS property, the management of
  security and safety arrangements (including the use of CCTV in accordance with our CCTV
  Policies and monitoring of the OMBS's IT and communications systems in accordance with
  our Acceptable Use Policy), management planning and forecasting, research and statistical
  analysis, the administration and implementation of OMBS rules and policies for students and
  staff, the maintenance of historic archives and other operational purposes
- Staff administration including the recruitment of staff and engagement of contractors, administration of payroll, pensions and sick leave, review and appraisal of staff performance, conduct of any grievance, capability or disciplinary procedures.
- The promotion of OMBS through its own websites, the prospectus and other publications and communications (including through our social media channels)
- Maintaining relationships with students by communicating with the body of current and former students and / or their parents or fee-payers and organising events

## 6. Keeping in touch

We keep in touch with past students and members of our OMBS Alumni. We will use your contact details to keep you updated about our activities and to invite you to events which may be of interest to you by email, eg. Past Student Day, School visits, etc.

### Feedback on services provided

We use a third party research system, SurveyMonkey to help us collect feedback from students on our programmes and services. All data gathered from questionnaires is analysed and used internally by OMBS to improve our Professional Business Diploma course. We will contact respondents regarding comments made only if they indicate in the questionnaire that they are happy for us to do so. For more information, please see <u>SurveyMonkey's privacy policy</u>.

## 7. How long we keep personal data

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted Records Retention Guidelines, which set out the time period for which different categories of data are kept. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact us.

## 8. Your rights

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

- 1. Request access to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- 2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- 3. Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground
- 4. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- 5. Object to the processing of your personal information based on legitimate interests, but not if we have a compelling reason to process it
- 6. Object to automated decision making (although this does not currently apply as we do not currently carry out automated decision making)
- 7. Request the transfer of your personal information to another party

You always have the right to withdraw consent, where given, or otherwise object to receiving generic communications. Please be aware however that OMBS may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Policy, or may exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because of a purchase of goods or services).

If you would like to access or amend your personal data, or would like it to be transferred to another person or organisation, or have some other objection to how your personal data is used, please make your request in writing to us.

We will aim to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits, which is one month in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows this.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any confidential reference given by OMBS for the purposes of the education, training or employment of any individual.

## 9. Student Data

The rights under Data Protection legislation belong to the individual to whom the data relates. Our student data protection and GDPR policy provides further information regarding this. All students have access to this and are made aware of where they can read it on their first day at OMBS.

## **10. This Policy**

Our privacy notice should be read in conjunction with our other policies and Terms and Conditions of Enrolment which make reference to personal data, including our Safeguarding Policy, Health & Safety Policy, Acceptable Use Policy and IT Policy.

We will update this Privacy Policy from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

If you believe that we have not complied with this Policy or have acted otherwise than in accordance with Data Protection Law, you should notify us. You can also make a referral to or lodge a complaint BAC (British Accreditation Council).

BAC sets standards within the independent further and higher education sector. Their accreditation is held by hundreds of colleges and training providers in the UK and overseas, including OMBS. Visit the BAC website for a copy of their Handbook and follow the instructions in the Complaints Section: <u>http://www.the-bac.org/wp-content/uploads/2015/09/BAC-Accreditation-Handbook.pdf.</u> OIA (The Office of the Independent Adjudicator of Higher Education).

The OIA is an independent body set up to review student complaints. Visit the following link for access to their instructions on how to take a complaint further: <u>http://www.oiahe.org.uk/making-a-complaint-to-the-oia/how-to-make-a-complaint.aspx.</u>

Oxford Media & Business School Southern House, 1 Cambridge Terrace, Oxford, OX1 1RR Tel: 01865 240963 – email: info@oxfordbusiness.co.uk

31 May 2019