



## STUDENT PRIVACY NOTICE

<b>Approved By:</b>	<b>Board of Trustees</b>
<b>Approval Date:</b>	19.04.2020
<b>Next review Date:</b>	19.05.2022
<b>Form Holder:</b>	IBTC

This privacy notice explains how International Bible Training College (IBTC)<sup>1</sup> (“we”, “our”, “us”) collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective students of IBTC (“you”, “your”).

IBTC is the data controller of your personal data and is subject to the **Data Protection Act 2018** (“DPA”) which includes **General Data Protection Regulation (GDPR)**

### 1. How we collect your information

We may collect your personal data in a number of ways, for example:

- a) from the information you provide us with when you interact with us before joining a course, for example when you express your interest in studying at IBTC;
- b) when you apply to study at IBTC and complete enrolment forms;
- c) when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
- d) in various other ways as you interact with us during your time as a student at IBTC, for the various purposes set out below;

### 2. The types of information we collect

The College collects, holds and processes personal data relating to its students about whom we collect personal data, in accordance with the **Data Protection Act 2018** which includes **General Data Protection Regulation (GDPR)** and the **College Data Protection Policy**. The information that the students provide is used for the administration, planning and management of the work of the college, student education and training and administering of student and College funding. Personal information will not be passed on to other organisations for their own marketing or sales purposes.

You may be contacted after you have completed your programme at IBTC for further collaboration with IBTC and its projects. You can indicate on your permission form if you do not want to be contacted. Further information about the use of, and access to, your personal data and details of organisations with which we may share data, you can get from the Data protection officer, Gordica

<sup>1</sup> In all the following text International Bible Training College (IBTC) is referred to as IBTC. The college’s trading name is IBTI.



We may collect the following types of personal data about you:

- a) Personal details and contact information (gender, name, address, date of birth and passport number, phone numbers, email addresses
- b) Information relating to your education and employment history, the courses you have completed, dates of study and examination results of your study at IBTC. Also your examination grades and other information in your individual learner file.
- c) Information about your family or personal circumstances, and both vocational and extracurricular interests (e.g. skills, hobbies and interests).
- d) Any other legitimate personal data relating to academic and pastoral support, for example to provide you with appropriate pastoral care;
- e) Counselling records;
- f) Sensitive personal data and information about criminal convictions and offences, including:
  - information concerning your health and medical conditions (e.g. disability and dietary needs);
  - certain criminal offence or conviction information
  - information about your racial or ethnic origin; religion or similar beliefs; and
  - financial information and bank details
- g) photographs
- h) appraisals
- i) references
- j) disciplinary information

### **3. How we use information about our students**

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

- a) recruitment and enrolment;
- b) academic matters, including:
  - the provision of our core teaching, learning and assessment services (e.g. registration, assessment, attendance, managing progress, certification, placement and any other activity while studying at IBTC);
  - maintaining student records;
  - assessing your eligibility for placement, further ministry in churches or other Christian organisations;
- c) non-academic matters in support of our core services, including:
  - providing student support services (e.g. Information, mentoring, counselling and guidance);
  - monitoring equal opportunities;
  - safeguarding and promoting the welfare of students;
  - ensuring students' safety and security;
  - managing the use of social media;
  - administering the financial aspects of your relationship with us and any funders, e.g. payment of students' lodging, provision of funds.
- d) other administrative purposes, including:

- promoting our college;
- dealing with grievances and disciplinary actions;
- dealing with complaints and enquiries.

This is not an exhaustive list but sets out the primary reasons the IBTC handles student personal data.

#### **4. The basis for processing your information and how we use it.**

We may process your personal data because it is necessary:

- a) for the performance of your application;
- b) for us to carry out legally required duties;
- c) for us to carry out our legitimate interests;
- d) for us to protect your interests;

We may also use your personal data for the following:

- a) to interact with you before you are enrolled as a student, as part of the enrolment process (e.g. to send you a brochure or answer enquiries about our courses);
- b) once you have enrolled, to provide you with the college regulations, code of conduct, training, fees, etc. as set out in our student handbook;
- c) to deal with any concerns or feedback you may have;
- d) to monitor and evaluate the performance and effectiveness of IBTC, including by training of our staff or monitoring yours and their performance.
- e) to maintain and improve the academic, financial, estate and human resource management of IBTC.
- f) to promote equality and diversity throughout IBTC.
- g) to seek advice on our rights and obligations, such as where we require our own legal advice;
- h) recovering money you owe to us;
- i) for fundraising purposes;
- j) to meet our compliance and regulatory obligations, such as safeguarding requirements;
- k) for the prevention and detection of crime;
- l) in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- m) to protect your or another person's vital interests (safeguarding or Prevent duties)

We may also process your personal data for other reasons where we have your specific or, where necessary, explicit consent to do so.

#### **5. Sharing information with others**

The college may be legally required to pass on some of this data to various agencies, government departments and local authorities. In this case the information is used for the exercise of functions of these government departments and to meet statutory requirements. The IBTC may share some information with other organisations, charities and churches with which it collaborates and where necessary regarding a student's placement and outreaches according your consent and IBTC's legitimate interest. The information that students provide may also be shared with awarding bodies, other organisations for education, training, volunteer work, employment and wellbeing-related purposes according your IBTC's legitimate interest.. If requested, information may be shared with the police in relation to a crime.

We may also share your personal data with other third parties including professional and regulatory

bodies (e.g examination boards) in relation to the confirmation of qualifications, professional registration).

## 6. How long should we keep student records?

After you leave IBTC as a graduate student certain parts of your data may be retained as a permanent archival record for research purposes and to confirm your award and period of study. If you are not successful in your application or you reject the offer to study at IBTC, the data which you have provided as part of your application will be removed from our record.

In general, the retention of student records falls into three broad categories: **short, medium and permanent**.

It is the nature of the activities which give rise to these categories, and having a better understanding and appreciation of what these are, will help to identify which category individual documents will fall into. Once you have determined the category it is the record owner's responsibility to determine the exact length of time these records should be kept. The IBTC retention schedule lists the minimum amount of time the records should be kept. If IBTC wishes to keep records for longer they should make a noted reference within their own records keeping documentation explaining the reasons why.

a. **Short-Term retention records** relating to the student as an individual and consumer of IBTC services are relatively short term and should be retained for a short finite period once the student leaves IBTC. This period should be shorter than for records relating to the wider arrangements. E.g. applicant records for unsuccessful applications relate to individuals who have not entered into a contract with IBTC and should therefore be included within this short-term category for retention.

b. **Medium term retention** - The contractual relationship between the institution and the student is subject to the same statutory limitations on action as any other contract. The current limitation period as defined by the Limitation Act 1980<sup>2</sup> is 6 years. The date at which the student leaves that programme of study normally provides the retention 'trigger' for when this retention period begins.

c. **Permanent retention** - BTI has an obligation, during a student's working life, to provide factual information on what they have studied and achieved, i.e. a transcript, students' applications, and students' register. The retention period for these records should reflect the need to fulfil this obligation over long periods of time and therefore will have permanent retention period.

d. Requirements under the Data Protection Act 2018 - The Data Protection Act does not specify a time period for retaining personal information rather it states that personal data should 'not be kept for longer than is necessary'. It is therefore for the college to decide what length of time is considered 'necessary'.

## 7. Keeping personal data up to date

The data protection laws require us to take reasonable steps to ensure that any personal data we process is accurate and up-to-date. Applicants and students are responsible for informing us of any changes to the personal data that they have supplied during the course of their application and

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<sup>2</sup> Legislation.gov.uk, Limitation Act 1980, CHAPTER 58, Arrangement of sections, Part i, ordinary time limits for different classes of action, [internet], [https://www.legislation.gov.uk/ukpga/1980/58/pdfs/ukpga\\_19800058\\_en.pdf](https://www.legislation.gov.uk/ukpga/1980/58/pdfs/ukpga_19800058_en.pdf), Accessed, 01.10.2018.

enrolment. Enrolled students can update their details by contacting the data protection officer via email [policies.data@ibti.org.uk](mailto:policies.data@ibti.org.uk) or IBTC administrator Phillida Bennett via email [admin@ibti.org.uk](mailto:admin@ibti.org.uk).

## 8. Your rights

Under GDPR you have the following rights:

- a) to obtain access to, and copies of, the personal data that we hold about you;
- b) to require that we cease processing your personal data if the processing is causing you damage or distress;
- c) to require us not to send you marketing communications;
- d) to require us to correct the personal data we hold about you if it is incorrect;
- e) to require us to erase your personal data (excluding some of the academic data that has **permanent retention period**).
- f) to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- g) to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- h) to 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.

**Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.**

If you have given your consent and you wish to withdraw it, please contact our data protection officer using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

## 9. Requesting information

As noted above, you have the right to access information held about you. Your right of access can be exercised at any time by contacting the data protection officer.

## 10. Contact us

If you have any queries about this privacy notice or how we process your personal data, or to request access to the personal data that we hold about you, you may contact our data protection officer, Gordica Karanfilovska by email: [policies.data@ibti.org.uk](mailto:policies.data@ibti.org.uk), or by phone on+44(0)1444 248 383.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner's Office. You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

## 11. References and further information

- The International Bible Training College (IBTC): <https://www.ibti.org.uk/>

- Data Protection Act 2018: <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- Information Commissioner's Office: [www.ico.org.uk](http://www.ico.org.uk)