



DATA PROTECTION POLICY AND STUDENT FAIR PROCESSING NOTICE

Scope and Purpose	This document outlines the data protection policy and student fair processing notice, applying to all students at Belfast Bible College.
Who uses the process	Monitoring staff and students within the college
Process review	This process should be reviewed following the end of each academic year.
Date last reviewed	July 2021
Date next review	August 2022

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2. INTRODUCTION

This policy document applies to the storage and processing of all personal data at Belfast Bible College concerning students, staff and hirers of our premises, whether past or present. The College is registered under the Data Protection Act 1998 (Reg. No. Z63200983) for this purpose. The data controller for all personal data is Belfast Bible College.

3. BELFAST BIBLE COLLEGE GOAL

Our goal is to equip 21st century disciples through theological education that is orientated towards a lived-out faith that impacts the world.

4. POLICY FRAMEWORK

This policy has been developed in accordance with the following regulations, policies and procedures. This list is not exhaustive:

- Belfast Bible College Undergraduate Handbook
- Belfast Bible College Postgraduate Handbook
- Belfast Bible College Handbook
- Belfast Bible College Policy and Procedures Documents
- QAA 'UK Quality Code for Higher Education – Part C: Principle 3 'Information should be available and retrievable where intended audiences and information users can reasonably expect to find it. The format and delivery of information should take account of the access requirements of a diverse audience.
- University of Cumbria Handbook for Validated Awards

5. POLICY

The College is committed to preserving the privacy of its learners, employees and hirers and to complying with the Data Protection Act 1988.

To achieve this aim, we shall process and store information about our learners, employees and other clients and contacts as follows:

5.1. Personal data will be processed fairly and lawfully in accordance with each individual's rights under the Act.

5.2. Student personal data will be obtained for educational purposes, employee data will be stored for employment purposes and hirer's data will be stored in order to facilitate the use of our premises.

5.3. We will store all data, whether manual or electronic, securely

5.4. We will collect only relevant and proportionate data i.e. it will be adequate and not excessive.

5.5. Every effort will be made to ensure the data is accurate and, where necessary, kept up to date.

5.6. Data will not be disclosed to any other person unless we are legally or contractually obliged to do so.

5.7. We will only transfer data within the College as we feel best supports all educational and employee services to the recipient.

5.8. Students and staff will be provided with a Fair Processing Notice which will set out what data is stored and the purpose for which it is being stored. The Notice will also contain details of what, if any, information will be passed to a third party and the purpose for which it will be used by them. Information that is already in the public domain is exempt from the Data Protection Act 1988.

5.9. Personal data will not be transferred outside the European Economic Area unless the country offers adequate data protection. Students from non-EU countries should give consent for all information required to enable them to register as a BBC student, and (to enable the programme to be effective for them) data to be shared with other educational institutions they have been or are connected with.

5.10. Data will be kept no longer than necessary.

5.11. Personal information on the College intranet (the VLE) will be reviewed and updated at the end of each academic year. This information is deleted within as reasonable time as possible e.g. at the end of the academic year when a student leaves the College.

6. STUDENT DATA PROCESSING FAIR PROCESSING NOTICE

6.1. PERSONAL INFORMATION STORED AND THE PURPOSES FOR WHICH IT IS USED

6.1.1. From the moment you contact the College we will create a record in your name; this includes (but not necessarily limited to) contact details, and the type of study which interests you. This is to service your enquiry.

6.1.2. When you come on either a Discovery Day, a college visit, or a Short Course, all the information which you have completed on your application form will be added to a new or pre-existing record on the College database and/or in electronic files This is to service your enquiry and/or current or future application(s).

6.1.3. On receiving an application to a specific course, all the information that you have completed on your application form will be added to either a new or pre-existing record on the College database, and/or stored in a manual student file and/or in electronic files.

This is to:

- a. process your application;
- b. provide services to you as either an applicant and/or a student (including providing such things as library and certain online facilities);
- c. identify and provide additional support or specific services for students who have, for example, provided information about a disability; (We consider disclosure of this information as explicit consent to use this information for this purpose);
- d. provide information about overseas students to the UK Visa and Immigration Department to service their visa application;
- e. produce statistical information for publication to the validating University (UoC), Quality Assurance Agency (QAA) and the Higher Education Statistics Agency (HESA) in line with government requirements);

i. for enquirers and those who withdraw their application or place on a Undergraduate or Post Graduate course, only the number of people who have applied in a specific year is passed on to the University. No data identifying an individual will be shared

ii. Statistical data passed to the UoC and the QAA will first be anonymised.

iii. Statistical data passed on to HESA is named and currently only refers to students on the Undergraduate programme. For further details please see the HESA Student Collection Notice at

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>,

iv. HESA will anonymise the data before passing it on to other government agencies such as the Higher Education Funding Council for England (HEFCE), Department of Education for Northern Ireland, or Department for the Economy.

f. provide information to other agencies when are legally obliged to do so; this could include the Student Loan Company or a Local Councils regarding council tax exemption etc.

g. respond to requests for confirmation of your course status including your grade point average to your sponsor, if your fee or part of your fee is being paid for by sponsorship.

h. provide support for you when you have left the College by contacting you to invite your prayer requests or service your requests for information about your time at College; you can opt out of receiving further information at any time by contacting the college by phone, letter or email.

i. contact alumni with information newsletters. For fundraising or marketing purposes you can opt out of receiving this information at any time by contacting the college by phone, email, or letter.

j. At your request respond to outside agencies (e.g. with proof of student status etc. or reference applications for prospective employers or educational establishments).

6.1.4. Correspondence relating to you, fee payments and data to do with examinations, assessments and course results and qualifications and other relevant information are stored for current and past students to support our academic and other services to you.

6.1.5. Photos of you are stored in both manual and electronic files but only appear in media (including social media, websites and written and electronic publications) with your permission at the start of each academic year. You are provided with the opportunity to withhold permission for any and all photographic representations to be posted on any media.

6.1.6. Information is stored in the College database and in student paper and electronic files. Student paper files are moved to the College archives after you have left the College. All data storage rooms are kept locked when empty and digital files are password protected.

6.2. TRANSFERRED INFORMATION

6.2.1. We are required to send some of the information we hold about students to the University of Cumbria (UOC). This only applies to students who are registered on courses validated by the UOC. This information includes contact details, date of birth, student number and course details and other data used by them to support your academic and other services to you. It is a condition of registration on an UOC validated course that we provide this information to them. The UOC's own Data Protection Guidelines provide further information on how this information is used by them.

<https://www.cumbria.ac.uk/media/university-of-cumbria-website/content-assets/vco/documents/legal/Student-Privacy-Notice.pdf>

We are required to share some information we hold about students to Queen's University Belfast (QUB). This only applies to students who have enquired about QUB courses, or are QUB students. It is a condition of being a QUB student studying through BBC that we provide this information to them. QUB's own Data Protection Guidelines provides further information on how they use this information.

<https://www.qub.ac.uk/privacynotice/Students/SchoolsPrivacyNotices/StudentPrivacyNotice.html>

6.2.2. We are also required to send some of the information we hold about you to the Higher Education Statistics Agency (HESA). This information forms your HESA record. It is a condition of your registration that we provide any and all information requested by HESA to them. HESA's own Data Protection Guidelines provide further information on what information is passed on to them and how it is used by them.

<https://www.hesa.ac.uk/about/regulation/data-protection>

6.2.3. We are required to send some information to various local and Regional Government Bodies (including for example Dept. of Education for Northern Ireland, Department for the Economy (Higher Education Branch), Student Loans N.I.). It is a condition of your enrolment as a student that we provide any and all information required by them. Contact details may be obtained from the Academic Office of the college

6.3. TRANSFER OF DATA OUTSIDE THE EEA

6.3.1. It may sometimes be necessary to transfer your personal information overseas. When this is needed, information is only shared within the European Economic Area (EEA), or with Colleges or universities you (and normally we) have a connection with in United States of America, or other country/ies when we have your specific knowledge and permission. Any transfers made will be in full compliance with all aspects of the Data Protection Act. E.g., this may be for the purposes of submitting a reference for you.

6.3.2. By registering on a Belfast Bible College course, you agree to your personal information being processed in this way.

6.4. SECURITY

We take security very seriously. All staff are made aware of the security procedures they must follow when handling your personal information. Information is protected from unauthorised access and we are confident no one will be able to access your personal

information unlawfully. We also protect information which is being transferred (e.g. password protected).

6.5. ACCESS TO DATA

Under the Data Protection Act, you have the right to receive a copy of the personal data the College has about you. If you wish to see your files, you can ask the Academic Office

6.6. MORE INFORMATION AND ADVICE

For more information and advice on data protection matters, contact the College Data Protection Officer via reception, or the academic office.

7. RESPONSIBILITIES, POLICY APPROVAL AND UPDATING

7.1. The Board and Management Team have overall responsibility for this policy including its approval, monitoring and annual review.

7.2. All staff have responsibility for ensuring that the policy is applied in all their dealings with data held for staff, students, applicants and enquirers.

8. POLICY AND NOTICE COMMUNICATION

8.1. This document can be found in the full College 'Policy and Procedures' document which is located in the student area on the College VLE and on the College website: www.belfastbiblecollege.com .

8.2. Every effort will be made to respond to any request to provide this policy in a different format.

8.3. This policy will be included in staff and student induction and hirers of our premises will be made aware of the policy when placing a booking.

Appendix 1

Belfast Bible College Data Protection Monitoring Form	
Number of complaints received raised at College since last meeting	
If a complaint has been lodged:	
Nature of Complaint: (informal or formal):	
Date complaint Lodged	
Description of Complaint	
College Response	
Any action to be considered to mitigate future risk	
Any staff training to be implemented	

Date form completed _____

Signed _____