Privacy Notice – UCEN Manchester

1. Introduction

This Privacy Notice applies to applicants, students and individuals who enquire about, apply for or enrol onto our courses at UCEN Manchester, including next of kins/advocates as may be applicable, ("**you**", "**your**").

There is a bite-size version of this notice available at: Data Protection Information at UCEN Manchester.

2. What is the purpose of this document?

UCEN Manchester ("**we**", "**our**", "**us**") is committed to protecting the privacy and security of your personal information ("**personal data**"). This Privacy Notice describes how we collect and use personal information about you in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (the "**GDPR**"), together with other UK data protection laws.

Our Data Protection Policy, as well as more information on how we process personal data, can be found at: https://www.ucenmanchester.ac.uk/legal/dataprotection/ You can also contact our Data Protection team at dpo@ltegroup.co.uk if you have any questions regarding this document.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using your personal data and what your legal rights are in relation to it.

3. The kind of information we hold about you

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Some of the personal data we collect about you is classed as being 'special category personal data'*. Access to and sharing of this information is controlled very carefully.

The categories of personal information that we collect, store, and use about you may include:

	Enquirers	Applicants	Students	Next of Kin / Wellbeing contact
Access Logs (system access/electronic entry logs to sites)			✓	
Classroom/workspace monitoring software			✓	
Complaint information	✓	✓	✓	✓
Criminal offence data*		✓	✓	
Data captured by CCTV systems and security cameras	✓	✓	✓	✓
Date of birth			✓	
Education history and qualifications	✓	✓	✓	
Education, health and care plan information (EHCP)*			✓	
Employment status, history, and related information			✓	
Financial support information			✓	
Gender		✓	✓	
Health information, medical conditions or injuries, and learning difficulty and disability status*		✓	✓	

	Enquirers	Applicants	Students	Next of Kin / Wellbeing contact
Household situation			✓	
Invoicing details			✓	
IP addresses and cookies	✓	✓	✓	✓
National Insurance number			✓	
Next of kin/emergency and wellbeing contact information			✓	
Personal information and contact details	✓	✓	✓	✓
Photo identification			✓	
Photographs/videos for business purposes			✓	
Photographs/videos for marketing purposes			✓	
Race, religion, nationality, or ethnicity*			✓	
Residency status, right to work and immigration information		✓	✓	
Sexual orientation*			✓	
Telephone recordings (to central departments)	✓	✓	✓	✓

We may collect other additional personal information during the course of our relationship with you.

4. How is your personal information collected?

We typically collect personal information about students through the information you provide to us during the enquiries/application/enrolment process, or through a third party such as our education partners, the local authority or your previous college.

We also collect personal information about next of kin/emergency contacts, where relevant. We collect this information from the student or from the next of kin themselves.

We collect system access information and on-site entry/exit and movement information at our campuses via our software systems, and images/footage via our on-site CCTV and camera systems.

5. How will we use information about you?

Overall, we use your personal data to deliver our services to you. We have set out the main purposes for processing below.

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a "lawful basis" for the processing. Where we process special category personal data or criminal offence data, we are required to establish an additional lawful basis for processing that data.

Some of the below grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.

Purpose	Lawful Basis
To assess your suitability for participation on our programmes **To deliver and administer your education, and related services**	• To comply with our legal obligations • Performance of a task in the public interest (education) • Necessary for the performance of a contract
To contact next of kin/emergency/ wellbeing contact in an emergency	• Performance of a task in the public interest (education)

Purpose	Lawful Basis
	• Where it is needed to protect a person's vital interest and they are not capable of giving consent (e.g. in an emergency)
To administer, or otherwise deliver, our obligations arising from your contract of study **To provide personal support, including welfare and safeguarding**	• Necessary for the performance of a contract • To comply with our legal obligations, e.g. in respect of health and safety law, equality law and safeguarding • Performance of a task in the public interest (education) • Legitimate interests (where applicable) • Where it is needed to protect a person's vital interests and you are not capable of giving your consent (e.g. in an emergency) • With your consent (where applicable)
Equal opportunities monitoring	• To comply with our legal obligations
Internal and statutory reporting, audit, and other legal obligations, including compliance with health and safety law and monitoring equality of opportunity or treatment	• To comply with our legal obligations, e.g. employment and health and safety law • Performance of a task in the public interest (education)
Direct marketing **Photography for promotional/ advertisement purposes**	• With your consent
Research and planning purposes	• Performance of a task in the public interest • Where it is in our/your legitimate interests
System access, site entry logs & CCTV/security camera footage	• Necessary for the performance of a contract • Performance of a task in the public interest (education) • Where it is needed to protect a person's vital interest • Where it is in our/your legitimate interests
To assess/review our handling of telephone calls for quality & training purposes	• Where it is in our/your legitimate interests

Do we need your consent?

We do not generally process your personal data based on your consent (as we can usually rely on another legal basis, as outlined in the table above). If we do process your personal information based on your consent, we will inform you of this before we start the processing and you will have the right to withdraw your consent at any time.

6. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to provide you with access to our programmes, or we may be prevented from complying with our legal obligations (such as equal opportunities monitoring).

7. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

8. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We use automated decision making in some limited circumstances, but we do not envisage that it will be used to make any significant decisions about you. However, we will notify you in writing if this position changes.

9. Data sharing

We may share your personal data with third parties where essential to comply with our legal and contractual obligations and/or to deliver our services to you. This may include:

- Nominated next of kin, emergency or wellbeing contact persons
- Government Agencies
- Awarding organisations
- Our education/course delivery partners
- Schools, colleges, universities and other education providers
- Employers
- Fee collection agencies
- Third-party technology providers

Further details or a full register of who we may share your personal data with and why is available on request: dpo@ltegroup.co.uk

Information on how we handle disclosure requests, for example from law enforcement bodies for crime prevention and investigation purposes, can be found here: LTE Group and Disclosure requests

All parties who we share data with are required to take appropriate security measures to protect your personal information, in line with our policies. We do not allow our third-party service providers (our data processors) to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Your data may be transferred outside of the UK, for example, where we use third party providers to deliver our services, such as externally hosted software or cloud providers who store data globally. We undertake strict due diligence on all partners to ensure that they have the adequate safeguards in place to protect your data under Article 46 GDPR.

10. Data security

We have measures in place to help protect the security of your information.

- Where the infrastructure is in our direct control, we have put in place appropriate security measures to help prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.
- We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

11. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. Details of retention periods for different aspects of your personal information are available in our **Records Management Policy** and **Data Retention Schedule** (available on request from dpo@ltegroup.co.uk).

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

12. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

13. Your individual rights in connection with personal data

Subject to certain conditions, you have the following rights in relation to your personal data:

Access to your personal information (known as the Right of Access/ a Subject Access Request)

Rectification of the personal information we hold about you if it is inaccurate

Erasure of your personal information (in certain circumstances)

To be Informed about the processing your personal information

Restriction of processing of your personal information

Transfer of your personal information to another party

Objection to processing of your personal information

Suspension of processing of your personal information

If you wish to invoke any of the above rights, please contact us via email: dpo@ltegroup.co.uk

Further guidance on your rights is available from the Information Commissioner's Office (https://ico.org.uk/).

14. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

LTE Group Data Protection Officer
Whitworth House
Ashton Old Road
Manchester
M11 2WH

dpo@ltegroup.co.uk

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

This can be done via the ICO website, or by telephone:

https://ico.org.uk/global/contact-us/contact-us-public/

0303 123 1113

More information on the ICO's complaint procedure can be accessed at: https://ico.org.uk/make-a-complaint/