

# The London Interdisciplinary School

## Privacy notice for students

### Introduction

This privacy notice applies to applicants, current students, former students, and alumni. This notice explains how the School will process your personal data.

### How do we collect your information?

The School may collect your personal data in a number of ways. These include:

- Information that you provide when engaging with us before joining, for example, when you express an interest in studying at LIS;
- When you make an application to study at LIS and complete application forms and other admissions processes and procedures, and when you interact with LIS staff. This applies whether you have applied directly to LIS, or through the Universities and Colleges Admissions Service or any other third party admissions service;
- When you communicate with LIS, for example by telephone, email or via our website;
- In a range of other ways when you interact with LIS staff as a student of LIS and in line with the purposes of data collection outlined below;
- From third parties, for example from your previous or current school, college, higher education provider or employers (such as when they are providing a reference about you or are sponsoring your studies).

### What types of information do we collect?

The School may collect a range of different information, including:

- Personal details such as your name, title, date of birth, national insurance number (or other tax identification number), passport number, country of domicile, nationality, and, by consent, parental information (occupation and participation in higher education), and your eligibility for Free School Meals or Educational Maintenance Allowance;
- Contact details such as home address, contact address (if different), email address and telephone number;
- Information relating to your education and employment history including the schools, colleges, higher education institutions you have attended and where you have worked, the courses you have completed, dates of study and examination results. We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- Special category data, as defined in the GDPR, and information about criminal convictions and offences, including:

- Information concerning your health and medical conditions (e.g. disability and dietary needs);
- Certain criminal convictions;
- Information about your racial or ethnic origin; religion or similar beliefs and sexual orientation.

In addition, if you study at LIS, the data stored and processed by the College will include:

- Academic performance;
- Attendance and progression;
- Breaches of School policies such as academic or other misconduct;
- Banking and payment information.

### How do we use this information?

We will only process data for specified purposes and when this is justified in accordance with our [Data Protection Policy](#).

The table below shows examples of core purposes for the collection and processing of personal data, and the legal basis/justification for these purposes. This details that we may process your personal data primarily because it is necessary for the performance of our contract with you, or in order to take necessary pre-contractual steps.

Purpose	Legal basis / justification
Recruitment and promoting LIS services, e.g. providing information about programmes, Discovery Days, or other events happening on or off campus	Necessary for the School's legitimate interests and by consent for marketing.
Assessing eligibility to undertake an LIS academic programme	Necessary for the purposes of preparing to enter into a contract.
Communicating with applicants and students	Necessary for the purposes of preparing to enter into a contract and thereafter as a contractual necessity.
Assisting applicants and students to obtain residential accommodation / housing	By consent



<p>Provision of academic programmes and related services including:</p> <ul style="list-style-type: none"> <li>• Provision of core teaching, learning and research</li> <li>• Assessment of academic progress and performance (including attendance)</li> <li>• Maintaining student records</li> <li>• IT</li> <li>• Library</li> </ul>	<p>Necessary to deliver on the contract to provide your chosen academic programme.</p>
<p>Provision of non-academic services including:</p> <ul style="list-style-type: none"> <li>• Student support</li> <li>• Monitoring equal opportunities</li> <li>• Safeguarding and promoting the welfare of students</li> <li>• Ensuring students' safety and security</li> <li>• Managing the use of social media</li> </ul>	<p>Necessary to deliver on the contract to provide the student experience associated with your academic programme, as well as in specific cases to protect a student's vital interests (e.g., in relation to safeguarding)</p>
<p>Providing appropriate IT and other infrastructure facilities, for example a virtual learning environment, as well as the development of new IT systems</p>	<p>Contractual necessity and the School's legitimate interest in providing a proper infrastructure to support the provision of academic programmes and related student services</p>
<p>Administration of complaints, grievances and appeal or to deal with any other feedback</p>	<p>Contractual necessity</p>
<p>Immigration matters</p>	<p>Necessary for the School to comply with its legal obligation in relation to students or applicants who hold a Tier 4 Visa. Such processing may also be in the public interest and your consent may be required in some cases.</p>
<p>Making reasonable adjustments for disabilities and providing relevant support to students or applicants with ill health</p>	<p>By consent</p>
<p>Regulating the School's community (including dealing with misconduct under the School's procedures for academic and other misconduct)</p>	<p>Contractual necessity</p>
<p>Obtaining payment of fees, administering finance and assessing eligibility for bursaries</p>	<p>Contractual necessity and the School's legitimate interest in obtaining payment for the services it provides</p>

Protecting the School's property and assets (for example by dealing with misconduct)	Necessary for LIS's legitimate interest in safeguarding its property and assets.
Alumni relations (including fundraising)	Necessary for the School's legitimate interests and by consent for marketing, fundraising and maintaining an alumni network.
Internal audit	Necessary for the School's legitimate interests in maintaining internal control, and/or prevention, detection and investigation of fraud

We may also process your personal data because it is necessary for our or a third party's legitimate interests. For example, we may use your personal data to:

- monitor and evaluate the performance and effectiveness of the School, including by training our staff or monitoring their performance;
- maintain and improve the academic, corporate, financial, estate and human resource management of LIS;
- promote equality and diversity throughout the School;
- to seek advice on our rights and obligations, such as when we require our own legal advice.

In addition, we may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- For the prevention and detection of crime;
- In order to assist with investigations (including criminal investigations) carried out by the police and other authorities

There may be other processing in addition to the above, for example, when you access the LIS website which uses cookies, or when LIS takes photos or videos of you and publishes them. This is done on the basis of our other policies and we will inform you about such processing at the time when the data is obtained or as soon as possible afterwards.

### **What information do we get from third parties?**

In some cases, LIS will receive your information from third parties. The table below outlines core examples of the information that LIS might receive about you and where this might come from

<b>Data LIS may receive</b>	<b>Source</b>
Application data, which includes contact details and attainment, work experience, previous institution, contextual data and disability information	UCAS or any other third party admissions service
Your immigration status	Home Office (UKVI), Foreign and Commonwealth office
Transcripts (details of programmes undertaken or being undertaken at another institution, and your attainment)	Another institution and/or secondary schools
Medical, accessibility related and similar information, occupational health medical clearing (we only obtain this information from third parties if you give us consent to do so)	Another institution, medical practitioners and/or family members
Your financial status	Student Loans Company or equivalent
Details of any LIS associated complaint	Officer of the Independent Adjudicator
Details of performance in other educational institutions or in relevant jobs	Referees (identified by you)
Information relating to criminal convictions	Disclosure and Barring Service
Accreditation information	Relevant professional accrediting bodies

### **What information do we share, with whom and how?**

Sometimes we may need to share your personal data. The table below gives examples of this kind of data sharing.

<b>Recipients</b>	<b>Data which we may wish to share with them</b>
LIS academic staff	Contact details, attendance and progression information, education and attainment data, and where necessary and subject to your consent, for the implementation of reasonable adjustments and/or the provision of other support. Your contact details may also be used by these staff when recruiting to related activities including work placements.
LIS professional staff	Contact details, immigration details, attendance and progression information, education and attainment data, and where necessary and subject to your consent, for the implementation of



	reasonable adjustments and/or the provision of other support. Your contact details may also be used by these staff when recruiting to related activities including work placements.
Alumni team	Contact details, attendance and progression information.
LIS Student Association	Contact details
Employer partners	Your CV as well as any accessibility and assistance requirements (by consent, and where there is a legal basis to do so) and related information
Future employers	Personal information relating to conduct, performance and academic achievement, when asked for a reference.
Official bodies to which the LIS is obliged to report, for example HES, the OFS and their agents	Information supplied as necessary to fulfil School's reporting obligations to these bodies. This may include relevant special category data, and will be anonymised (and in cases where small amounts of data makes a student identifiable, the data will be suppressed).
External examiners	Exam papers
UK Home Office	Passport details, programme details and fees, and housing details
Housing providers	Student details
Data processors (e.g. third parties who process personal data on our behalf such as software providers)	Application details, attendance records
Local Authority	Contact details
Student loans company	Contact details
Research partners	Contact details, attendance
Regulatory and accrediting bodies	Contact details, attendance and progression information
Funding bodies, scholarship and bursary providers	Contact details, attendance and progression information
Government agencies, for example HMRC (only upon request and where there is a legal basis for doing so)	Contact details, attendance and progression information
Police and other crime prevention and detection agencies (only upon request and where there is a legal basis for doing so)	Contact details

## How long do we keep information?

We must retain some student personal data after they leave LIS either because the law requires it or, for other reasons, e.g. to provide transcripts and references. Each type of data will be kept for a set period, which is defined in the [LIS Data Retention Schedule](#).

## Data Protection Officer

At the point of registration as a higher education provider with the Office for Students, the School will have in place a Data Protection Officer. Their responsibilities will be to:

- Advise the School and its staff on its obligations under the GDPR;
- Monitor compliance with this Regulation and other relevant data protection law, including monitoring training, overseeing periodic audits to ensure 14 compliance, overseeing catastrophe testing, and ensuring GDPR compliance is built into the design of data systems;
- Report on GDPR compliance to the Board;
- Provide advice where requested on data protection impact assessments;
- Cooperate with, and act as the contact point for, the Information Commissioner's Office;
- Operate as the first point of contact for data protection issues.

The School's Data Protection Officer will be contactable at a dedicated email address, once appointed. In the interim, an appropriate internal member of staff will adopt the responsibilities of the DPO as outlined above. This member of staff will be contactable at [hello@tlis.org](mailto:hello@tlis.org).

## Queries and complaints

For more information on your rights, if you wish to exercise any right, for any queries you may have, or if you wish to make a complaint, please contact us at [hello@tlis.org](mailto:hello@tlis.org) with the subject starting "Data".

## Complaints to the information commissioner

You have the right to complain to the Information Commissioner's Office (ICO) about the way in which the School processes your personal data.

<b>Name of policy/procedure:</b>	<b>Privacy notice_Students</b>
<b>Document owner:</b>	<b>Jasper Joyce, Head of Strategy and Operations</b>
<b>Date Originally Created:</b>	<b>04/2019</b>
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<b>Audited by:</b>	<b>[name and job title]</b>
<b>Date of Audit:</b>	<b>MM/YYYY</b>
<b>Date of next review:</b> (annually unless otherwise agreed)	<b>MM/YYYY</b>
<b>Related documents:</b> (eg associated forms, underpinning processes, related policies or overarching policies)	<b>Data Retention Schedule</b> <b>Data Protection Policy</b> <b>Freedom of Information Policy</b>

<b>Version Control</b>			
<b>Version</b>	<b>Author [name]</b>	<b>Date</b>	<b>Brief summary of changes</b>
<b>1</b>	<b>Jasper Joyce (Head of Strategy and Operations)</b>	<b>01/04/2019</b>	<b>Original draft</b>
<b>2</b>	<b>Hannah Kohler (Head of Student Experience)</b>	<b>01/05/2019</b>	<b>Minor wording changes</b>
<b>3</b>			