



2.0. Compliance

2.10. Privacy Policy for Applicant Data

Version Number 8

Reviewed by QA August 2025

Version Control Statement

Version	Date	Changes	Reason	Author	Next review
1	28/10/2018		New Policy	Head of HE	August 2019
2	11/11/2019	Detailed to include General Data Protection Regulation GDPR	General review	Head of HE	August 2020
3	July 2020	Minor changes	Annual review	Head of HE	Jul/Aug 2021
4	August 2021	None	Annual Review	IT Manager	Aug 2022
5	August 2022	e-mail domain updated	Annual Review	IT Manager	Aug 23
6	August 2023	No changes	Annual Review	QA	Aug 24
7	August 2024	General refresh	Annual Review	QA	Aug 25
8	Sept 2025	General Review	Annual Review	QA	Sept 2026

Contents

Introduction.....	4
Key Principles.....	4
<i>What personal data do we process?</i>	<i>5</i>
Specific Data we collect.....	5
<i>Special category data.....</i>	<i>6</i>
The legal basis for processing your personal and sensitive personal data	6
<i>Contract.....</i>	<i>6</i>
<i>Legitimate interests.....</i>	<i>6</i>
<i>Legal obligation.....</i>	<i>6</i>
<i>Consent.....</i>	<i>6</i>
What we use personal data and special category data for	7
Automated decision making	7
Who will we share your data with?.....	7
<i>How do we share your Data?</i>	<i>7</i>
Accuracy of your personal data.....	7
How do we keep your data?	8
<i>How long do we keep your records for?.....</i>	<i>8</i>
Your Rights in relation to your data	8
<i>The right to be informed</i>	<i>8</i>
<i>Subject Access Rights</i>	<i>8</i>
<i>The right to rectification.....</i>	<i>8</i>
<i>The right to erasure.....</i>	<i>8</i>
<i>The rights to restrict processing and to object to processing.....</i>	<i>8</i>
<i>The right to object to processing.....</i>	<i>9</i>
<i>Rights to data portability</i>	<i>9</i>
College Policy in Relation to these rights	9
<i>Submitting Subject Access Requests.....</i>	<i>9</i>
Personal Data Breaches	9
Questions and Concerns	10
Complaints	10

Privacy Policy for Applicant Data

Introduction

This policy explains how Waltham International College (WIC) may use personal data that applicants provide. It is intended to ensure the College remains compliant with the UK's Data Protection Act (2018) and the General Data Protection Regulation (GDPR).

The policy contains examples of many of the common uses of applicant data. Applicants are made aware of the notice when the College confirms receipt of their application and will receive a student version of this notice during the induction process. The notice is also available on the College website.

Key Principles

WIC has legal obligations including that it must process personal data fairly and lawfully and in a transparent manner. As the College determines why and how your personal data is used it is considered legally to be the data controller of the personal data. This policy sets out WIC's commitment to ensuring that it will be clear, open and honest with all applicants, regarding the way their personal data will be used.

The College is registered with the Information Commissioner's Office as a data controller under the reference ZA110203.

The College will ensure that:

- valid grounds ('lawful Basis' under the GDPR) for collecting and using personal data are clearly specified to all applicants when it collects their personal data
- once such data is collected, the data is handled in ways that the applicants would reasonably expect and is not used in any way that may breach any laws
- personal data collected from applicants will be used in a way that is fair (and not in ways that are unduly detrimental or have adverse effects, are unexpected or are misleading)
- information provided will not be disclosed to unauthorized persons

What personal data do we process?

WIC collects and processes personal information that is necessary to assess applicant eligibility to study on the programme applied for, to communicate with the applicant during the application process as well as to administer and deliver education services thereafter.

This includes:

- your personal data in order to satisfy our obligations to regulatory, awarding and funding organisations, statistical agencies and local authorities (collectively referred to as external bodies) who regularly require such data to ensure the College maintains:
- ethical and transparent recruitment practices,
- accuracy in recording statistical trends and in processing fees, bursaries, grants and loan information,
- information about you and your study and your communications with us including details of your education, qualifications and publications
- financial information gathered for the purposes of administering fees and charges, loans, grants, bursaries
- copies of passports, visas, and address and other contact documents

Specific Data we collect

Data held by the College includes:

- Personal
 - name,
 - date of birth,
 - national insurance number
 - Identification information
- Contact
 - phone number,
 - email
 - postal address
- Educational
 - qualifications,
 - grades,
 - learning support needs,
- Personal Characteristics
 - gender,
 - age,
 - ethnicity,
 - nationality,
 - country of birth
- Financial for example bank details

Special category data

We may also process “special category data” which includes information about disabilities declared. This includes personal information such as evidence of physical or mental health or condition required to confirm eligibility for special adjustments including evidence of any condition or needs such as a medical report, details of any needs relating to a disability, or learning difficulties.

This information is only used so that individual support needs may be discussed and any adjustments considered. No special category data is processed to assess eligibility to study on the programme applied for.

The legal basis for processing your personal and sensitive personal data

Contract

We may process your personal data and special category data because it is necessary for us to do so in order to take steps at your request prior to entering into a contract with the College when applying to study

The College collects and processes personal information that is necessary to provide the required services to you for the contract and also to meet its legal and statutory obligations in delivering the contract.

Legitimate interests

We may use and process your personal information where it is necessary for us to pursue our legitimate interests or the legitimate interests of relevant external bodies. Such legitimate interests can include:

- verifying the accuracy of data that we hold
- improving our services via staff training
- promoting equality and diversity throughout the College

Legal obligation

We may also process your personal data for our compliance with legal obligations. This can include:

- compliance with relevant external body requirements (as contained in contracts and accreditation documents) and regulatory obligations such as anti-money laundering laws and safeguarding requirements
- assisting with investigations (including criminal investigations) carried out by the police and other competent authorities

Consent

The College will use consent as a lawful basis for some processing. Where we do so we always provide you with the choice as to whether or not to opt in to such processing.

What we use personal data and special category data for

Waltham International College processes your personal and sensitive personal data in accordance with data protection legislation in order to:

- assess eligibility of the applicant to study on the programme applied for
- assess fee status
- communicate with the applicant to inform the outcome of the application
- communicate with the applicant to clarify or discuss further information that may be required relevant to the application
- advise the applicant of the College's admissions policies and processes
- provide details of services provided by the College and other information relevant to the application (e.g. student support)
- monitor equal opportunities data
- evaluate the performance and effectiveness of the College including research and statistical analysis

Automated decision making

The College does not use your personal data for making any automated decisions about your application.

Who will we share your data with?

The College will not disclose any data it holds about individuals to any third parties, other than external bodies as listed in this policy, as well as law enforcement agencies, immigration, and crime prevention organisations, upon fully identifying the officers seeking such information.

Your data will be shared internally within the College with staff who require the use of the data in order to administer your application to study at the College. Staff will also use your personal data for the purposes of understanding the effectiveness of the College's recruitment and admissions processes.

How do we share your Data?

Any data we share with external bodies (through emails and data sharing platforms) is secured with passwords or encrypted at all times. All passwords and encryption codes are communicated to the external bodies in separate e-mails.

Accuracy of your personal data

We encourage all applicants to notify the College if any changes are required or inaccuracies identified in the personal data that has been provided with the application. This can be done by contacting our admissions team at admissions@wic.ac.uk

How do we keep your data?

All documents submitted by applicants is kept securely in each individual file and stored away. Soft copies are kept in password protected or encrypted locations. Only photocopies of documents such as identification documents, will be kept, with a verification stamp and signature to attest that it has been checked against the original by College staff.

The College also completes an annual audit of all identification documents.

How long do we keep your records for?

The College will keep records for the following lengths of time:

Type of documents	Length of time
Rejected / Incomplete Application Documentation	six years
Successful applicants	As per student records
Financial Records	Seven years

Your Rights in relation to your data

In line with the UK Data Protection Act (2018) and GDPR, individuals have the following rights in relation to their personal data held by an organisation

The right to be informed

You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.

Subject Access Rights

You have a right to access the personal data that the College holds about you. A request to see the personal data held by the College can be made through a Subject Access Request. The Subject Access Request Form and detailed instructions of completing the form are available [here](#).

The right to rectification

You have the right to have inaccurate personal data held by the College rectified or completed if it is incomplete.

The right to erasure

Once personal data collected by the College is no longer necessary for the purpose for which it was collected and processed, you may have the right to have the data erased. The College manages the retention period of data held through its retention schedule.

The rights to restrict processing and to object to processing

In certain circumstances you have the right to restrict the processing of your personal data. This is likely to arise when there is an issue concerning the accuracy or the legitimate grounds for processing of the personal data.

The right to object to processing

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- direct marketing (including profiling), and
- processing for purposes of scientific/historical research and statistics

The College will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

Rights to data portability

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. The College will respond to any Subject Access Requests in compliance with this.

Note: Detailed guidance on all of the rights you have with regard to the personal data that we hold and process about you is available on the ICO website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

College Policy in Relation to these rights

Anyone whose personal data is held by the College has a right to access the personal data that it holds on them (Subject Access Request)

Submitting Subject Access Requests

- Any individual wishing to submit a Subject Access Request should follow the instructions here
- Individuals who wish to exercise the above rights should contact the Admissions at admissions@wic.ac.uk
- Requests should be submitted in writing, specifying exactly what personal data and/or processing they require and the right they wish to exercise

Personal Data Breaches

WIC will respond promptly to any identified personal data breaches and thoroughly investigate those incidents to ascertain whether;

- The breach should or must be reported to the ICO
- Data subjects should or must be made aware of the breach; and
- It is necessary to amend processes or introduce new measures to mitigate against any further breaches

Questions and Concerns

Any queries and questions relating to the way data is collected and used by the College should be addressed to the Data Protection Officer at dataprotection@wic.ac.uk

Complaints

Applicants with complaints regarding how their data has been handled by the College should address these with the Data Protection Officer at dataprotection@wic.ac.uk in the first instance.

Applicants not satisfied with the way their complaint has been handled can take such complaints to the Information Commissioners Office (ICO), within three months of the last meaningful contact with the College.

Complaints to ICO may be

- Submitted online at: <https://ico.org.uk/concerns/handling>
- Posted to: Customer Contact, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.