

Student Privacy and Data Protection Policy

SUMMARY

This policy outlines the procedures and guidelines for the collection, storage, and transfer of data to ensure compliance with relevant regulations and to protect the privacy and integrity of personal and institutional data.

1. INTRODUCTION

OMNES Education London School (“**OELS**”) is committed to protecting your privacy. OELS is a member of the OMNES Education Group, leading private multidisciplinary higher education and research institution, specialising in the fields of management, engineering, communication and digital media and political science, with various schools and campuses in France and abroad. As such, OELS is committed to safeguarding the privacy and security of the personal information in our care. This policy explains how we collect your personal information, what we do with it and your rights in respect of it.

2. WHO ARE WE?

When we say ‘we’, ‘our’, ‘us’, ‘the School’, or ‘OELS’ in this policy, we are referring to European Education Centre Limited, 32 Aybrook Street, London, United Kingdom W1U 4AW (ICO registration ZB5468834), trading as OMNES Education London School, and all or any of the entities which make up the OMNES Education Group, as the context requires. More information on the OMNES Education Group can be found at omneseducation.com.

We are the controller of the personal information that we process, i.e. the organisation, which determines, alone or jointly with another party how your personal information is processed and for what purposes. This means that we are legally responsible for ensuring our systems, processes, suppliers and people comply with data protection laws in relation to the personal information that we handle. This includes data protection laws in the UK and those European data protection laws, which are incorporated into UK law.

3. WHAT OTHER KEY TERMS DO I NEED TO KNOW?

Data Protection Laws – means any law, statute, declaration, decree, directive, legislative enactment, order, ordinance, regulation, rule or other binding restriction as updated and amended from time to time which relates to the protection of individuals with regards to the processing of Personal Data and privacy rights to which a party is subject, including the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (amended by SI 2011 no. 6) and the EU General Data Protection Regulation 2016/679 (the EU GDPR), (as incorporated into UK law under the UK European Union (Withdrawal) Act 2018) as the same are amended in accordance with the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit)

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Regulations 2019 (as amended by SI 2020 no. 1586) as amended to be referred to as DPA2018, PECR and the UK GDPR.

Home Institution – Where applicable, we refer to your “Home Institution” to mean the higher education institution, which you are enrolled at if different from OELS.

Personal Data or Personal Information has the meaning set out in the Data Protection Laws and is any information we hold about you which can identify you, directly or indirectly. For example by reference to an identifier such as a name, identification number, location data, an online identifier, photographs, expressions of opinion about you or indications as to intentions about you.

Processing is any activity carried out with personal information according to the data protection laws. For example obtaining, recording, holding, carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal information to third parties as a result of those third parties having access to it.

We explain some of the other key terminology as we use it, throughout this policy.

4. WHAT PERSONAL INFORMATION DO WE PROCESS ABOUT YOU?

For the purposes of our relationship with you, we may process the following types of personal data:

- **Contact and identification details** - such as name, title, address, telephone number, email address or those of anyone you have listed as emergency contacts, ID number and photograph, National Insurance number (where you have voluntarily provided it);
- **Personal details and equality of opportunity or treatment data** – such as marital status, nationality, date of birth, sex and gender identity, racial origin, religious beliefs, sexuality, details about your family status such as your parental status and any dependents you have;
- **Immigration data** – such as visas and passports;
- **Personal and socio-economic background information** – such as details of your parents’ occupation and education, your careers planning stage and your occupational interests and details of whether you have been in care or have caring responsibilities;
- **Information about your health and wellbeing** – such as information about any disability and/or medical condition you might have, about your engagement with the School Student Welfare and Support Services;
- **Financial details** – such as household income, fees and financial support record (including records relating to the fees paid, Student Loan Company transactions and financial support, scholarships, and sponsorship);
- **Information about your education:**

- **In the past** - such as the lower and higher education institutions that you have attended (including schools, colleges, universities), the courses you have completed, dates of study and examination results;
- **With us** - such as:
 - your test and interview scores and admission decisions, examination records (including records relating to assessments of your work, details of examinations taken, and your predicted and actual examination grades);
 - attendance records;
 - supervision, teaching, and tutorial activities including engagement with online tools such as the VLE; and training needs analysis and skills acquisition records, recordings of teaching and learning or research activities in which you were a participant;
 - your feedback and testimonials (collected through meetings, surveys, focus groups and other activities) on course provision, school services and the student experience.
- **With others** - such as placement and internship records, studies at another institution as an established component of your course of studies, or career development opportunities taken.
- **Information captured in your student records** – such as:
 - progression, achievement of milestones and progression reports;
 - information about your involvement in school procedures and in our appeal and complaint procedure, including disciplinary procedures (which includes academic and non-academic misconduct), academic appeals, complaints, fitness to study, and applications for extensions, periods of suspension or dispensations from regulations;
- **Images** – such as photographs and related information (subject to you providing authorisation during your application and registration process) and videos (subject to you providing us with authorisation during testimonials);
- Information gathered through CCTV and building access information.

5. WHERE AND HOW DO WE COLLECT THIS PERSONAL INFORMATION?

Data you provide to us, when you:

- Take part in the admissions, registration or enrolment processes or sign up for newsletters, alerts or other information about events on our website or otherwise;
- Participate in our online learning, research and development courses;
- Participate in exams, assessments and interviews;
- Engage with our School Student Welfare and Support Services teams;
- Update details about yourself on your student account and/or record;
- Contact us by email, telephone, post or in another way to ask for help or other information;
- Participate in surveys, focus groups, feedback-sessions, contests or other promotional activities;
- Provide information upon accessing one of our buildings on campus;

- Engage with our Student Life activities.

Data we otherwise collect about you, when you:

- Attend events we have organised and/or which are at our premises;
- Visit our website, intranet, webpage for your module and related websites that we run. We have a separate policy, which sets out similar information relating to the cookies that we use, which can be found here: [Legal notice and privacy policy - OMNES Education](#);
- Visit on one of our campuses and/or in one of our building (through use of CCTV cameras).

Data we collect from other sources:

- The University and Colleges Admission Service (UCAS);
- The Police and Criminal Records Agency;
- Other members of the OMNES Education Group;
- Your Home Institution, if applicable;
- NHS services and other health and social care professionals.

6. HOW DO WE USE YOUR PERSONAL INFORMATION?

For what purposes are we using it?

- Administrative purposes, including the management of your registration and student file, the administration of fees, management of funding, facilities administration, timetabling purposes, provision of services to comply with and perform the terms our agreement with you and/or for our legitimate interests;
- Provision of pastoral care/duty of care responsibilities including health and safety and safeguarding requirements and related legal obligations;
- Academic purposes, providing you with learning and teaching and support services, academic, advisory and supervisory, in person and remotely online, and other optional services e.g., Careers Service, in order to carry out required examination and assessment of knowledge, record academic progression and confer awards, to enable us to carry out our public interest functions, comply with and perform the terms of our agreement with you and/or for our legitimate interests;
- Security, safety and prevention and detection of crime, including maintaining the physical security of our premises (e.g. visitor logs) and computer or electronic security, to enable us to meet our contractual and legal obligations to you and others, and to safeguard your and others' vital interests;
- Legal and statutory reporting, enabling us to meet our legal obligations;
- Archiving and research purposes, including research and statistical analysis into learning analytics as may be necessary in respect of our public interest functions and/or for our legitimate interests;

- To operate our business and evaluate and improve student services and the student experience (including developing new training; optimising and improving our services; analysing our training/services);
- To support the marketing and promotion of OELS and more widely of the OMNES Education Group (only with your consent);
- To activate, register or update the services you have purchased from us (e.g. access to a PC, mobile phone, smartphone, access to an online teaching module, access to a digital library, etc.)
- To send important notices about our terms, registration conditions, privacy and other policies;
- To protect you and our staff from fraud and other illegal activities or unfounded accusations; establish, exercise and defend your rights and those of our staff and comply with our applicable legal and regulatory obligations;
- To inform you of upcoming events, updates, new training/services and services and other offers in accordance with your communication preferences;
- To operate and manage our websites.

On what basis can we use it?

Our processing and sharing of your Personal Data is only lawful under data protection laws if, and to the extent that, a lawful basis applies to our processing. Data protection laws set out different legal conditions and bases that may apply, which include:

- **Consent** – This means you must provide us with your specific, informed, authorisation for us to use certain personal data. We will generally not rely on this lawful basis for processing, other than if we want to use photographs we have taken of you e.g. at events you have attended, on our social media, or to use testimonials we have collected from you through your participation in surveys and testimonials.
- **Performance of or entry into a contract** – You may enter into a contract with us when you accept an offer of a place with us, either through your Home institution or through us directly. We need to collect, share and process certain of your Personal Data to comply with and perform our obligations under the terms of such contract. For example, we may use your data for administration (management of your registration and student file) or for academic purposes (to be able to provide you with learning and teaching services), to perform our contract with you when you enrol with us.
- **Compliance with a legal obligation** – We are required to comply with certain legal obligations and regulations, which require the processing of your Personal Data and we may rely on these obligations as a lawful basis for collecting, processing and sharing your data in this way. For example, we collect your data on our premises and sites, using CCTV and building access controls for safety and prevention and detection of crime.
- **Protection of your, or another person's vital interests** – There may be situations where we need to share or otherwise process your personal data because it is essential to your or another person's life, i.e. a "matter of life and death". For example, we may share data with

NHS services and healthcare providers, where there is an imminent concern for your life or the life of another.

- **To perform a task carried out in the public interest/exercise our public functions** – As a higher education body, we have certain obligations to carry out public interests tasks. A lot of the processing we do, and purposes for which we process your data, is necessary for these core tasks we have as a higher education provider that provides research and education. For example, ensuring our campus is safe and secure for you and other students and visitors, providing welfare measures and support services, and providing high quality education to you and other students.
- **For our, or a third party's, legitimate interests** - For us to rely on this lawful basis, we carry out a balancing exercise to make sure our legitimate interest does not override your privacy rights as an individual. As part of this test, we consider the purpose of our processing – our legitimate interest – and whether our processing is necessary to meet that process. For example, we consider we have a legitimate interest to process your personal data for the purposes of providing alumni services, that the processing of your personal data is necessary and proportionate to meet this purpose, and that our processing of this personal data will not unreasonably intrude on your privacy.

On what basis can we use special category data?

Special category data is a more sensitive type of Personal Data, which includes data about your health, religion, political beliefs, trade union membership, sexual orientation, philosophical beliefs and biometric data used for identification purposes (which includes, for example facial recognition), as well as data about any criminal convictions or offences, which you have supplied to us.

Special category data is afforded a higher level of protection because it is sensitive, and under data protection laws an additional condition or legal basis must apply, for us to be able to process this. We will only process this data if we have your explicit consent to process your personal data in this way, or if we are subject to a legal obligation to process it.

We may also collect and share details about any criminal convictions, offences, proceedings and allegations that relate to you, to help us to comply with our legal obligations, or where there is a substantial public interest reason for us to do so. This may include sharing such data with the police, other law enforcement bodies and with any other industry body set up for the purposes of safeguarding student safety in universities. We may have collected this from you as part of the admissions process, or as a result of a Disclosure and Barring Service check, if required for a particular course on which you have enrolled.

For how long will we retain your information?

We will keep your Personal Data only for as long as we need it to meet the purposes for which we collected it, including any relating to legal, accounting, or reporting requirements. We take into account a number of factors to decide how long your data should be kept, including the amount of data, its nature and sensitivity, and the potential risk of harm to you from its unauthorised use or disclosure, as well as the purposes for which we process that Personal Data and whether we can achieve these through other means.

Importantly, there are also legal requirements that will determine if we have to retain your Personal Information for a certain length of time.

Please get in touch using the contact details at section 10, if you would like to know more about the specific retention periods that we apply to your Personal Data.

7. WHO WILL WE SHARE YOUR PERSONAL INFORMATION WITH?

We may need to provide your Personal Information to other organisations within our group, to enable our business to carry out its day-to-day activities (including the provision of education and related services). All such sharing is undertaken with appropriate safeguards in place in compliance with applicable Data Protection Laws.

We may also share your Personal Information with third parties, such as:

- Your Home Institution, if applicable, including information about your examination results, your attendance, and about any disciplinary records with us, where this is necessary to enable us to carry out our public interest functions, comply with and perform the terms of our contract with you and/or for our legitimate interests;
- Third parties, such as our suppliers, contractors and service providers, which we have engaged to provide processing activities on our behalf where necessary for our public interest functions, comply with and perform the terms of our contract with you, and/or our legitimate interests. Such sharing will always be subject to a data processing agreement to safeguard your personal data;
- Relevant Higher Education bodies (e.g. Office for Students or its Designated Data Body, which at the date of this document is Jisc) where we are required to disclose your personal data as part of our statutory and regulatory duties;
- Partner institutions, including information about your examination results, your attendance, and about any disciplinary records with us where we need to comply with and perform our agreement with you, fulfil our public interest functions and/or our legitimate interests require us to do so;
- Parents and/or guardians where they are responsible for tuition payment, unless you inform the Academic Services Officer using the following contact details: name, postal address, phone number and email address, that you do not wish your records to be shared with these parties;
- NHS services and other health and social care professionals, where reasonably necessary to enable escalation of care plans and provision of support and/or in the event it is identified that there is an imminent risk or a cause for concern in relation to you or another person, which sharing shall always be subject to robust procedures to ensure the confidentiality of your Personal Data;
- Police and security services where reasonably necessary to enable protection and our duty of care.

We never share your personal details with external companies for the purposes of marketing their products and services.

8. TRANSFERS OF YOUR PERSONAL INFORMATION TO THIRD COUNTRIES

We may need to transfer your Personal Information to countries other than the country in which the data was originally collected to fulfil the purposes we outlined in section 6 above. This is because OMNES Education is an international organisation, so we might need to transfer your Personal Data to other members of our group, to our partner organisations, to our suppliers and service providers, or to your Home Institution, if applicable, (and organisations associated with your studies at your Home Institution), each of which may be located outside of the UK/EEA. These countries may not have the same data protection laws as the country in which you initially provided the information and may not provide the same level of protection.

Throughout the OMNES Education Group: Where we transfer personal data across the OMNES Education Group, as we mentioned in section 6 above, all such transfers will be facilitated by way of an intra group agreement, which applies contractual protections and other appropriate safeguards.

Outside of OMNES: We work with partner organisations and institutions, your Home Institution, if applicable, and other organisations and overseas agencies that may have helped to fund and support your studies. We also use suppliers and service providers in connection with the operation of our institution, who may have access to the personal information that we process, for example IT suppliers, when providing us with software support or cloud services. Where we transfer Personal Data to any of these organisations, your Personal Information will always be handled and protected in accordance with data protection laws. Where any Personal Data is processed by these organisations outside the EEA, we may:

- rely on an adequacy decision from the UK or the EU, determining that the country in which the data is processed, provides an equivalent level of protection for personal data, or
- where the data is processed in countries that the UK and/or the EU have **not** assessed as providing an adequate level of protection, we will ensure that Personal Data is adequately protected in accordance with applicable data protection law, and in particular Article 46 of the UK GDPR and the EU GDPR, by ensuring information security and other appropriate safeguards are in place, and using approved contract clauses to cover the transfer.

Please get in touch using the contact details at section 10, if you would like to know more about the specific mechanisms we use when we transfer your Personal Data out of the UK or EEA.

9. YOUR DATA PROTECTION RIGHTS

You have the right:

To be informed - A right to be informed about the Personal Information we hold about you.

Of access - A right to access the Personal Information we hold about you.

To rectification - A right to require us to rectify any inaccurate Personal Information we hold about you.

To erasure - A right to ask us to delete the Personal Information we hold about you. This right will only apply where (for example):

- we no longer need to use the Personal Information to achieve the purpose we collected it for;
- where you withdraw your consent if we are using your Personal Information based on your consent;

- where you object to the way we process your data (in line with the Right to Object, below).

To restrict processing - In certain circumstances, a right to restrict our processing of the Personal Information we hold about you. This right will only apply where (for example):

- you dispute the accuracy of the Personal Information held by us;
- where you would have the right to ask us to delete the Personal Information but would prefer that our processing is restricted instead;
- where we no longer need to use the Personal Information to achieve the purpose we collected it for, but you need the data for the purposes of establishing, exercising or defending legal claims.

To data portability - In certain circumstances, a right to receive the Personal Information you have given us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this Personal Information to another organisation, at your request.

To object - A right to object to our processing of the Personal Information we hold about you where our lawful basis is for the purpose of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process the Personal Information, which override your rights or which are for the establishment, exercise or defence of legal claims.

In relation to automated decision making and profiling - A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. We do not carry out any automated processing or profiling.

To withdraw - A right to withdraw your consent, where we are relying on it to use your Personal Information (for examples of when we might rely on your consent to use your Personal Information, see section 6).

You can exercise your rights by sending a written request to our Data Protection Officer (DPO): Mr Evgenii Aferin +44 (0) 203 725 4604, eaferin@omneseducation.com.

10. HOW CAN YOU CONTACT US?

If you have any questions in relation to this policy or generally how your Personal Data is processed by us, you can contact our Data Protection Officer (DPO): Mr Evgenii Aferin +44 (0) 203 725 4604, eaferin@omneseducation.com.

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your Personal Information. However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to our supervisory authority, which is the UK's Information Commissioner's Office. You can find out how to do this on the ICO's website, here: <https://ico.org.uk/make-a-complaint>.

Additional guidance can be sought from the Information Commissioner's Office (ICO): <https://ico.org.uk/>.

11. HOW WILL WE CONTACT YOU?

We might get in touch with you by post, electronic means (such as text messages, email, social media messaging or another suitable electronic method) or telephone, to fulfil any of the purposes we have set out above.