

# Privacy



The Data Protection Act 1998 (DPA) (the General Data Protection Regulation GDPR from May 2018) protects the rights of individuals by setting out certain rules as to what organisations can and cannot do with information about people. A key element to this is the principle to process individuals' data lawfully and fairly. In order to meet the fairness part of this we need to provide information on how we process personal data.

Metanoia Institute takes its obligations under the Data Protection Act very seriously and will always ensure personal data is collected, handled, stored and shared in a secure manner.

The following statement will outline what personal data we collect, how we use it and with whom we share it. It will also provide guidance on your individual rights and how to make a complaint to the Information Commissioner's Office, the regulator for data protection in the UK.

The Institute's official contact details are:

Metanoia Institute  
13 North Common Road  
Ealing  
London  
W5 2QB  
Tel: +44 (0)20 8579 2505

The Institute's Data Protection Officer is Amalia Sexton ([amalia.sexton@metanoia.ac.uk](mailto:amalia.sexton@metanoia.ac.uk)).

## How and why does the Institute use personal data?

The largest volume of personal data the Institute processes is in relation to students, at both undergraduate and postgraduate level. The primary purposes we process information about these individuals include:

- to enable us to administer student-related functions from original applications through to graduation and to provide alumni services;
- to plan and account for the use of the services provided;
- to produce information including statistics for relevant external agencies such as the Higher Education Statistical Agency (HESA) and the Higher Education Funding Council for England (HEFCE) which allocates funds to the Institute on the basis of student numbers;
- to enable Institute staff to communicate with students;
- to monitor academic progress over the period of enrolment towards completion of a qualification;
- to carry out assessment, authorise award of qualifications and verification of awarded qualifications post-study;

- to monitor complaints, disciplinary cases and academic appeals;
- to provide student support services, including financial, pastoral and IT/learning resources;
- to monitor, develop and update Institute systems to ensure they continue to operate effectively and securely; and
- to monitor equality and diversity objectives within the Institute.

The Institute processes personal data in relation to staff, both academic and non-teaching. This is undertaken to facilitate recruitment activity and to administer the requirements the Institute must meet as an employer in line with UK law. In addition, it is used to facilitate operational activity within the relevant faculty / professional service.

The Institute also processes anonymised personal client data in relation to Metanoia Counselling and Psychotherapy Service for clinical and professional purposes in line with the Code of Clinical Ethics and Conduct, which includes meeting the requirements of current data protection legislation.

Finally, the Institute processes aggregated and anonymised personal data as part of research activity in line with the Code of Research Ethics and Conduct, which includes meeting the requirements of current data protection legislation.

## What personal data does the Institute collect?

The Institute collects personal data from students at various stages. The volume and nature of the personal data collected is outlined below:

- Initial email/telephone enquiry:
  - *name and address*
  - *contact details (telephone number, email address)*
  - *subject / area of interest*
- Details from application forms:
  - *name and address*
  - *contact details (telephone number, email address)*
  - *age / date of birth*
  - *gender*
  - *nationality and country of residence*
  - *educational records to date*
  - *academic references (including personal statement and predictive grades)*
  - *disability declaration*
  - *criminal conviction declaration*
- Further data collected at enrolment or updated during a student's time at the Institute:
  - *Home address*
  - *Term-time address*
  - *Entry and other qualifications*
  - *Demographic information*

- *Funding, bursary and fee related information*
- *Information needed to provide services in relation to disability, wellbeing or any other type of pastoral support*
- *Course and stage details*
- *Attendance, progress and current status*
- *Assessment results*
- *Photograph for identification badge*
- *A full occupational health check will be completed to allow Metanoia Counselling and Psychotherapy Service practitioners to commence a placement*
- *Data collected for statutory monitoring and reporting purposes:*
  - *Religious belief*
  - *Sexual orientation*
  - *Ethnic origin*
  - *Nationality details*

Additional personal data may be collected by the Institute where relevant in relation to placements, professional body requirements, extenuating circumstances applications, appeals/complaints/disciplinary cases and any further optional student services.

The Institute collects the following information from academic and non-teaching staff which is outlined below:

- *initial application:*
  - *name and address*
  - *national insurance number*
  - *contact details (telephone number, email address)*
  - *self-declaration of permission to work in the UK and upload of passport/visa copy if necessary*
  - *relevant qualifications or indication of highest qualification held*
  - *professional development / training and membership of any professional body*
  - *employment history*
  - *supporting statement*
  - *Referee details*
  - *Criminal record disclosure*
  - *Data captured for equal opportunities monitoring (gender, date of birth, nationality, marital status, sexual orientation, religious belief, ethnicity)*
  - *Declaration about any disability as defined under the Equality Act 2010*
- *Once a candidate has been made an offer of employment:*
  - *Bank details*
  - *Emergency contact details*
  - *Qualification information required to be shared with HESA*
  - *Data captured for equal opportunities monitoring (as above)*
  - *Health information*
  - *Certain positions also require a DBS compliance check to be completed*

Further personal data captured about an employee is likely to relate to any performance or appraisal process and any information needed to maintain a sickness/absence record.

## Sharing of personal data

The Institute is required to share personal data with certain other organisations in order to meet statutory requirements or to provide services to students. Sharing will always be undertaken in line with the requirements of data protection law, either through the consent of the individual, or another relevant legal gateway. The personal data that is actually shared will always be limited precisely to what the other organisation needs to meet its requirements or deliver its services.

The information below outlines the key partners with whom the Institute shares personal data with on a periodic basis:

- Middlesex University in order to process the administration of enrolment onto and graduation from the relevant validated/joint programme(s). For further information please see the MDX privacy notice;
- Professional and Funding Bodies:
  - *Validation of registrations and awards; and*
  - *Approval of funding applications.*
- National/Local Government Departments and other public bodies:
  - [Higher Education Statistics Agency \(HESA\)](#) to produce a variety of statistical reports about higher education that are required to be published in the public interest;
  - *the Student Loans Company in connection with grants, fees, loans and bursaries;*
  - *the courts, the police and other organisations with a crime prevention or law enforcement function (subject to meeting the conditions of Section 29 of the DPA);*
- Other individuals / organisations:
  - *External examiners for examination, assessment and moderation purposes;*
  - *The Institute's insurers and legal advisers for the purpose of providing insurance cover or in the event of a claim;*
  - *The Office of The Independent Adjudicator to review student complaints;*  
*and*
  - *Employers who request a reference from the Institute (for relevant staff and students).*

## How long does the Institute keep personal data?

The Institute takes its obligations under the DPA very seriously in terms of not holding onto personal data for any longer than is necessary. The Institute has a retention schedule in place for the different categories of data it holds.

In some cases, there are good reasons as to why the Institute needs to retain data about students and other individuals for a significant period of time. The most important reasons are outlined below:

- in order that student awards can be verified in the long-term;
- to produce transcripts and references;
- for alumni services and ongoing relations with the Institute;
- to deal with complaints, appeals and disciplinary cases;
- for statutory reporting purposes and in order to complete statutory surveys such as the Destination of Leavers from higher Education Surveys;
- to produce references on request from previous employees; and
- in order to meet pension obligations.

## Your rights

An individual has the right to ask the Institute what personal data we hold about them, and to ask for a copy of that information. This is called making a Data Protection Subject Access Request.

A Subject Access Request should be submitted in writing to the Data Protection Officer ([amalia.sexton@metanoia.ac.uk](mailto:amalia.sexton@metanoia.ac.uk)) or in hard copy to the postal address provided earlier.

The Institute reserves the right to ask you to provide proof of identification and for you to clarify your request if it is unclear in the first instance. You will receive a reply no longer than 40 calendar days from the date you make the request in writing.

If you are unhappy with the initial response you can ask the Institute to undertake a further search if there is specific information you have good reason to believe exists but that hasn't been provided.

You also have the right to complain to the UK Regulator the Information Commissioner's Office (ICO's) if you believe your request has not been dealt with properly or you have a complaint to raise against the University for any other data protection related issue. A complaint can be raised via the [ICO's website](#) or write to the following address:

The Office of the Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

You also have the right to withdraw consent from the processing of your personal data by the Institute at any time, if your consent was sought initially to use your personal data.

## Right to rectify

If you believe the Institute holds information about you that is factually incorrect please contact your Academic Coordinator if you are a student or Human Resources ([hr@metanoia.ac.uk](mailto:hr@metanoia.ac.uk)) if you are a member of staff providing the correct information, and the University should update it within one month.

From May 2018 you will also have a number of new individual rights under the GDPR. The means to exercise these new rights with the Institute will be published early 2018 in the run-up to the rights coming into effect.

## Your responsibilities

All students, staff and any other relevant individual who handles personal information of which the Institute is responsible for must follow the requirements of the Data Protection Policy.