

Free2Learn Privacy Notice for Students

Notice about how we use your personal information

We are the data controller of personal information about you. We are Free2Learn and our head office address is: 263 Mare Street, London, E8 3NS.

Our Data Protection Officer is Laura Watkin. If you have any questions about this policy or the ways in which we use your personal information, please contact our Data Protection Officer on 0208 525 9430 ext 3002, laura@free2learn.org.uk or at the following address: Free2Learn, Morley House, 26-30 Holborn Viaduct, London, EC1A 2AT.

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

- [Admissions & Compliance](#)
- [Assessors](#)
- [Facilities](#)
- [Learning & Development](#)
- [Marketing](#)
- [MIS](#)
- [Teaching](#)

YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

Admissions & Compliance

The information that you give us

As part of your admission to Free2Learn we may collect your personal details including: name, address, date of birth, email address, telephone number, National Insurance number, ULR, medical information, copies of ID and proof of receipt of unemployment benefits.

The uses made of your personal information

We will use your information to manage and administer your education. This will include putting together class lists, for communicating with you, for dealing with admissions, for putting together reports and registers, to check entrance exam results, to allocate you to the correct course, for assessments, to make arrangements for exams or visits, to consider whether to offer places to students, to consider whether special provision or assistance is required for exams and visits and to comply with contractual agreements from funders.

The legal basis on which we collect and use your personal information.

Generally, the information is processed as part of our public interest task of providing education to you.

Where that information is special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

How long we keep your personal information.

All live learner files are kept securely by the Compliance Department in locked filing cabinets, and are accessible to authorised personnel only. Once the academic year has been completed, all files for that year are archived and stored in a lockable archive room, accessible only to authorised personnel. These files are stored for a minimum of 7 years for funder requirements.

How we share your personal information.

We may share your personal information with sub-contractors (such as Colleges) who provide services to Free2Learn and who require certain copies of documents for audit purposes.

How we transfer your personal information outside Europe.

We do not store or transfer your personal data outside Europe.

Assessors

The information that you give us

As part of our assessment of Free2Learn students we may collect your personal and educational details including: name, email address, telephone number, student review documentation and Individual Learning Plans.

The uses made of your personal information

We will use your information to manage the assessment of your written work and practical learning gained via work experience placements, and to prepare Individual Learning Plans tailored to students' individual requirements.

The legal basis on which we collect and use your personal information.

Generally, the information is processed as part of our public interest task of providing education to you.

How long we keep your personal information.

All live learner files are kept securely in locked filing cabinets, and are accessible to authorised personnel only. These files are stored for a minimum of 7 years for funder requirements.

How we share your personal information.

We may share the personal information with the MIS Department to ensure that funding and performance are being effectively delivered and monitored.

We may also share the personal information that you give us with Colleges that Free2Learn works with for audit and funding purposes, and the Free2Learn external auditor for audit purposes.

How we transfer your personal information outside Europe.

We do not store or transfer your personal data outside Europe.

Facilities

The information that you give us

For the purposes of promoting your safety and security, we may collect your personal details including name, address and images captured through CCTV in our buildings.

The uses made of your personal information

We use CCTV at our buildings for the purposes of crime prevention, security and health and safety and, accordingly, will capture imagery of visitors to Free2Learn. If you have an accident on our premises, the details of this will need to be recorded in Free2Learn's Accident Record Book (each centre holds an Accident Record Book). The Accident Record requires the name and address of the individual who had the accident.

The legal basis on which we collect and use your personal information.

We have a legitimate interest in wishing to interact with you to manage and operate Free2Learn effectively and to ensure that Free2Learn is safe and secure for all persons visiting; and to be able to do so, we need to understand details of who is in the building and to be able to communicate with them.

Under the Health & Safety at Work etc. Act 1974, we also have a duty of care towards non-employees. In the interests of exercising this duty of care, we use accident/incident reports to monitor the safety of our buildings and take remedial actions where necessary.

How long we keep your personal information.

We retain Accident Records for 3 years as an individual may bring a civil claim against Free2Learn within 3 years of the incident date.

How we share your personal information.

We may share information about an individual's Accident Record where necessary with our insurers, where the individual is bringing a civil claim against the company. CCTV footage may also be shared where relevant with the police where a criminal offence/incident has occurred, necessitating police intervention.

Use of Free2Learn equipment and computers

We keep an eye on how you use Free2Learn's equipment and computers and what websites you go on when you are browsing the internet at Free2Learn. This is because we have legal obligations to protect you, and we also have a legitimate interest in making sure you are using our computer equipment correctly and that you are not looking at any inappropriate content.

If you want to browse the internet privately, you will need to use your own devices which are not linked to Free2Learn's network or internet connection.

How we transfer your personal information outside Europe.

We do not store or transfer your personal data outside Europe.

.

Learning & Development

The information that you give us

For due diligence purposes we may collect your personal details including: copies of CVs, qualification certificates, DBS number, exam results, feedback on marked work, and some information about health/ learning difficulties in connection with the group profile.

The uses made of your personal information

We will use your information to ensure your place is appropriately funded. Personal information is stored for Due Diligence purposes, so that we have a record of what has been shared with our funding partners and to track any improvements over time. Funding Bid information is stored, so that we have a record of what we have applied for and the information that was shared, so that we can follow up with any additional items as necessary. It also allows us to analyse the effectiveness of our funding bid strategy over time.

The legal basis on which we collect and use your personal information.

Generally, the information is processed as part of our public interest task of providing education to you.

Where that information is special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

How long we keep your personal information.

ESF Funding requires us to keep information relating to these contracts for 10 years. We also need to retain information for ESFA funding for 7 years.

How we share your personal information.

We may share the personal information that you give us with any funding partner (e.g. College) as part of our contractual agreements. We may share information with funders on request, as part of a funding bid in order to receive additional funding (though the information is aggregated and does not reference individual students).

How we transfer your personal information outside Europe.

We do not store or transfer your personal data outside Europe.

Marketing

The information that you give us

For marketing purposes we collect names and email addresses.

The uses made of your personal information

We will use your information to email you about Free2Learn news, learning and career opportunities which may be of interest. If you have signed up via the Free2Learn website to receive the electronic Free2Learn newsletter, this will be sent to you by email.

The legal basis on which we collect and use your personal information.

Where you have previously studied at Free2Learn or commenced an application process with us before, then we will send you information about the courses we provide on the basis of our legitimate business interests. In doing so, we will comply with the requirements of the "soft opt in" and offer you an opportunity to refuse marketing when your details are first collected and in subsequent messages (by way of own unsubscribe).

Any other marketing we carry out will be on the basis of consent.

How long we keep your personal information.

Email addresses are kept for an indefinite period of time. If an individual decides to refuse future marketing contact from Free2Learn, their contact details will be removed from the marketing contact database.

How we share your personal information.

We do not share your personal information with any external organisations.

How we transfer your personal information outside Europe.

We do not store or transfer your personal data outside Europe.

MIS

The information that you give us

As part of your admission to Free2Learn we may collect your personal details including your name, address, post code, date of birth, National Insurance number, sex, ethnicity, email address and telephone number.

The uses made of your personal information

We will use this data in line with Free2Learn's contractual obligations, as it is used to determine that funding and performance are being effectively delivered and monitored. Personal data is collected by the Admissions department who obtain information in person from individuals in line with funding requirements.

The legal basis on which we collect and use your personal information.

Generally, the information is processed as part of our public interest task of providing education to you.

We are contractually required to hold data as part of the funding and performance management of our business, and required to report our data to funding bodies on a regular basis. Some of this data (e.g. ethnicity) is mandatory and reported for the purposes of equality and diversity monitoring.

How long we keep your personal information.

All live learner files are kept securely by the MIS Department in locked filing cabinets or access-controlled electronic documents, and are accessible to authorised personnel only. Once the academic Archived paper files are stored in a lockable archive room, accessible only to authorised personnel. These files are stored for a minimum of 7 years for funder requirements. For electronic data our database (PICS), has the option to archive and permanently erase data that is no longer required.

How we share your personal information.

Raw data is accessible to MIS team operatives who are able to access learner data and the electronic and paper copy sources the data is derived from. Access to learner data is shared with appropriate members of the academic team based on need, for example tutors are able to access data relating to their specific group in registers. Beyond this some department heads are able to request direct access if needed in the course of their work e.g. Head of Quality. The data is also shared with Free2Learn funding agencies.

How we transfer your personal information outside Europe.

We do not store or transfer your personal data outside Europe.

Teaching

The information that you give us

As part of the delivery of our courses to you, our staff will collect (e.g. for marking purposes), the work that you create as well as your name. In addition, when you use the IT systems we provide you with access to, we will process the data you input.

The uses made of your personal information

We will use your information for the purposes of teaching you and measuring your achievements.

The legal basis on which we collect and use your personal information.

Generally, the information is processed as part of our public interest task of providing education to you.

How long we keep your personal information.

All live learner files are kept securely in locked filing cabinets, and are accessible to authorised personnel only. Once the academic year has been completed, all files for that year are archived and stored in a lockable archive room, accessible only to authorised personnel. These files are stored for a minimum of 7 years for funder requirements.

How we share your personal information.

We may share your personal information with sub-contractors (such as Colleges) who provide services to Free2Learn and who require certain copies of documents for audit purposes.

How we transfer your personal information outside Europe.

We do not store or transfer your personal data outside Europe.