



Privacy Policy

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| Line Manager Responsible | Gillian May |
| Policy Creator | Clerk to Corporation |
| Approved by | Gillian May |

PRIVACY POLICY

1 WHO WE ARE

This is the privacy policy of Berkshire College of Agriculture (BCA) a further education college based at Hall Place, Burchetts Green, Maidenhead, SL6 6QR.

We are committed to protecting and respecting your privacy. This privacy policy explains what personal information we collect and how we will use it.

2 INTRODUCTION

BCA is committed to protecting the rights and privacy of individuals, including pupils, staff and others, in accordance with the General Data Protection Regulation (GDPR) which came into force on 25th May 2018. This privacy statement describes how we collect and use personal information about you (which we refer to as “personal data”).

BCA is a "data controller" (and is also referred to in this privacy statement as “we” “us” and “our”). This means that we are responsible for deciding how we hold and use your personal data. We are committed to being transparent about the personal data we collect and process and, as required under data protection legislation, we set out below details about the personal data we may collect from you.

It is important that you read this privacy policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing your personal data, so that you are aware of how and why we are using such data. This privacy policy supplements these other privacy notices and is not intended to override them.

3 PERSONAL DATA WE MAY COLLECT FROM YOU AND OUR BASIS FOR DOING SO

When you visit our website

We may collect personal data from you when you visit our website-<https://www.bca.ac.uk/>. The BCA web servers automatically log each visit that they receive. This data contains some information about you: the IP address of the computer or mobile internet device that you are using, the type of browser and operating system you are using and the internet address of the web site from which you came from. It also contains some connection information such as the page or service you are requesting and the date and time of the request. This information is collected so we can monitor the number of visitors to our website and to enhance user experience. We do this using website cookies which, unless strictly necessary for the website to operate, are only used with your explicit consent. Further information about the cookies used on our website is set out in section 8 below.

When you complete a form on our website to request information, book a visit or to

make an enquiry

BCA collects personal data supplied through the use of web forms, such as to request for information, to register for an open day or a zoo day, or to contact us with an enquiry.

We may collect the following types of personal data from you when you complete the form:

- Name
- Current year of study (if applicable)
- Address
- Email address
- Telephone number/mobile number

We will collect this information on the basis that we have a legitimate interests in doing so, i.e. to process your request or enquiry.

When you subscribe to our mailing list

If you choose to subscribe to our mailing list, we will collect your name, email address and telephone number and will use these to contact you for the purposes of keeping you up to date about BCA open days, taster day and other similar events. This information is only collected with your explicit consent in the form of a tick box opt-in form. You can withdraw your consent at any time by emailing us at contact@bca.ac.uk.

When you enrol as a student or apprentice

We will collect personal data from you as part of the enrolment process. More information about how we process your personal data as a student or apprentice can be found in our **Student Privacy Statement** which will be provided to you during enrolment. For students under the age of 18, we collect this data via a parent/guardian and will also collect the parents/guardians' contact details in order to correspond with them.

BCA alumni

As alumni of BCA, we will collect personal data such as your name, course details, email and telephone number in order to maintain contact with you and to keep you updated on BCA news and events. We do this on the basis of your explicit consent, which can be withdrawn at any time by emailing us at contact@bca.ac.uk.

Industrial placement/apprenticeship providers

If the organisation you work for provides industrial placements or apprenticeships we may collect your business contact details in order to effectively provide workplace learning to the students/apprentices placed with your organisation. We do this on the basis of performance of a public task and to perform between us, your organisation

and the student/apprentice.

Friends of BCA

If you are a local resident and apply to be a “Friend of BCA” which allows you access to our site and footpaths. We may collect your name, email address, address, vehicle registration number and telephone number. We do on the basis of our legitimate interests in maintaining contact with local residents and assisting in the security of the BCA site and the safeguarding of students.

Football Academy Matches

We record all Football Academy matches by video for learning and teaching purposes. We collect this data on the basis of our legitimate interests in providing the course to our students, and allowing them to review their progress over their time at BCA. The recordings are not used for marketing purposes.

Site visitors

When you visit the BCA site the following information will be recorded when using the automated visitor check in system in Reception: your name, company name (if applicable), your photograph and your vehicle registration number. This is collected on the basis of our legitimate interests and vital interests in protecting the health and safety of our staff and students.

The BCA site also has CCTV in place in order to protect the health and safety of its staff, students and visitors. We may collect CCTV videos and images of you while you are on site. Please see our **CCTV policy** for more information.

4 WHO WE SHARE YOUR INFORMATION WITH

We may disclose your personal data to BCA staff who are required to know it to perform their roles at BCA. This will include special category data where appropriate.

We may disclose your data to third parties as follows:

- If we are under a duty to disclose or share it in order to comply with any legal obligation (for example we may disclose it to the Department for Education, ESFA and Office of Students, Learner Records Service, local authorities, our insurers and HMRC).
- To any organisation providing you with an industrial placement or apprenticeship as part of your course at BCA. We will enter into a data sharing agreement with any contractors who we engage to assist us in providing our services. They will only process your personal data to process personal data on the basis of written instructions, and will keep it confidential and secure, and are obliged to implement appropriate technical and organisational measures to ensure the security of your personal data.

- To any employer or education institution who requests a student reference from us- we would only supply data of attendance and achievement for these purposes.
- To the police or other regulatory body in order to comply with the law.
- To non-statutory third parties (such as our suppliers) in which case they will only process your personal data to process personal data on our behalf, we require them to do this on the basis of written instructions, and they will be under a duty of confidentiality to us and are obliged to implement appropriate technical and organisational measures to ensure the security of your personal data.

We do not transfer your personal data outside the European Economic Area (EEA). Save that we store data (including personal data) on Google's G-suite cloud servers but our contract with Google incorporates the EU's standard contractual clauses to ensure that the personal data is protected to Google and EU standards.

5 SPECIAL CATEGORY DATA

Should you enrol as a student we may collect special category data from you, which may include information about your ethnicity and medical information.

We will usually only obtain this information on the basis of your explicit consent. In rare circumstances we will process your medical information in order to protect your vital interests or the vital interests of others where we have been unable to obtain your consent, and we may process information relating to your ethnicity on the basis of the public information and to fulfil our obligations as required by the ESFA. For further information please see our Student Privacy Statement.

It is rare that we process special category data for data subjects other than learners. Any other special category data processed by data subjects other than learners will only ever be processed on the basis of your explicit consent.

6 MARKETING

Your personal data will not be used for marketing or survey purposes without your explicit consent, which can be withdrawn at any time.

7 SECURITY

We take the necessary security measures to safeguard your personal data from risk of loss, destruction, unauthorised access, modifications or disclosure. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The table below sets out further details as to our specific retention policies for some personal data:

| Circumstances in which personal data was provided | How long do we keep it? |
|---|--|
| When you visit our website | 3 months from the date you visited our website, for audit purposes. |
| When you complete a form on our website to request information, book a visit or make an enquiry | 6 months after attendance at open day/zoo day or 6 months after the date of your request. |
| When you subscribe to our mailing list | For the duration of your consent (to be deleted upon consent being withdrawn) or if it becomes evident to us that your personal information is no longer up to date. |
| If you are a BCA alumni | For the duration of your consent (to be deleted upon consent being withdrawn) or if it becomes evident to us that your personal information is no longer up to date. |
| If you are a placement/apprenticeship provider | 12 years as stipulated by the Education and Skills Funding Agency. |
| If you are a Friend of BCA | For the duration of your membership to the Friends of BCA scheme |
| If you are a Football academy member or play in a football match against BCA. | For the duration of the student's course, typically 2 years, after which the footage is deleted. |
| When you visit our site and your image is captured on CCTV | 21 days from the date the image was taken, unless we have a good reason to retain for longer. |
| When you visit our site and register your details at Reception | A maximum of [5 years] for health and safety, security and safeguarding purposes. |

For retention periods in relation to student personal data, please see the **Student Privacy Statement**.

9 COOKIES

As you browse our website we also gather some basic data such as which pages you have visited, which we use for statistical analysis – this does not include any personal data. This basic data is passed to Google to allow us to analyse how visitors use our website, which helps us to improve the site.

We use three types of cookies on our website:

Social Media Cookies

Occasionally, we embed video content from websites including YouTube, or social networking content from Facebook and Twitter. As a result, when you visit a page with content embedded from social media sites they may place cookies on your computer as well. You can change your cookie settings at any time, this page explains how to do this: www.aboutcookies.org.

Analytics Cookies:

We use Google Analytics to anonymously track statistics about who uses our website. This data allows us to count the number of visitors we get and which pages they visit. This helps us improve the way our website works for visitors, for example, ensuring you find the information you're looking for easily. The visitor information is sent to our Google analytics account via Google. You can change your cookie settings at any time, this page explains how to do this: www.aboutcookies.org.

Other Cookies we use:

We use a cookie to identify which website requests belong to which visitor. This means that when you apply for a course online the cookie remembers your application. This information is not passed on to anyone.

You can change your cookie settings at any time, this page explains how to do this: www.aboutcookies.org.

If cookies are disabled the website will perform functionally as before, but our statistics will be less accurate. This means we will not be able to make the information you require as accessible to you.

12 THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for them.

10 CONTACTING US AND/OR ACCESSING YOUR PERSONAL DATA

What rights do you have?

As a data subject, you have a number of rights.

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. Please note that in some circumstances we may need to continue processing your personal data on a legal basis other than consent, such as to fulfil our legal obligations or for our legitimate interest.

If you would like to exercise any of these rights, please contact the Data Protection Officer (DPO), currently the Principal Gillian May, who is available at:

Address: Berkshire College of Agriculture (BCA)
Hall Place
Burchetts Green
Maidenhead
SL6 6QR

Email: gmay@bca.ac.uk

Who can I complain to?

If you believe that BCA has not complied with your data protection rights, you have the right to complain to the Information Commissioner Office (ICO) - <https://ico.org.uk/>

11 CHANGES TO THIS POLICY

This policy was last updated in January 2020. We may change this policy at any time by updating it on our website and without the need for consultation. Please ensure you check back to ensure you have read the most up to date policy.