Applicant Privacy Notice

Owner: Data Protection Officer
Contact: Dataprotection@sirm.ac.uk

Effective from	Last reviewed	Next review due
21 April 2026	21 April 2026	21 April 2027

1. About this notice

This privacy notice explains how SIRM College collects, uses, stores, shares and protects personal information about people who enquire about, apply for, or are offered a place to study at SIRM College.

It applies to personal information processed in connection with enquiries, events, prospectus requests, applications, admissions, interviews, offer-making, fee assessment, eligibility checks, right to study checks, visa or CAS processes where applicable, and pre-enrolment communications.

If you enrol with SIRM College, some of your applicant information will become part of your student record. From that point, your information will also be handled in accordance with the Student Privacy Notice.

2. Who we are

SIRM College is the data controller for the personal information it collects and uses about students, unless we tell you otherwise.

This means that SIRM College is responsible for deciding how and why your personal information is used, and for ensuring that it is handled in accordance with UK data protection law.

For some activities, SIRM College may process information jointly with, or on behalf of, another organisation. This may include awarding bodies, validating universities, admissions services, student finance bodies, recruitment agents, qualification-checking services, UKVI, or other relevant bodies.

3. How to contact us

If you have any questions about how your personal information is used, or if you wish to exercise your data protection rights, you can contact:

Data Protection Officer / Data Protection Contact
SIRM College

Email: dataprotection@sirm.ac.uk

You also have the right to complain to the Information Commissioner's Office, the UK regulator for data protection matters. We would encourage you to contact us first so that we can try to resolve your concern.

4. Personal information we collect

We may collect and use the following types of personal information about applicants and prospective students:

- **Your identity and contact details,** including:
- name, date of birth, student number, address, email address, telephone number, emergency contact details and photographic identification.

- **Enquiry and marketing information,** including
- including course interests, event attendance, prospectus requests, communication preferences, campaign responses and records of contact with SIRM.

- **Application information**, including:
- application forms, personal statements, qualifications, predicted or achieved grades, employment history, references, interview notes, assessment outcomes, offer details and correspondence.

- **Eligibility and admissions information** including:
entry requirements, recognition of prior learning information, English language evidence, fee status, right to study information, immigration status, visa information and CAS-related information where applicable.

- **Financial and funding information,** including
including fee status, sponsorship information, student finance information, deposit or payment information and refund information where relevant.

- **Digital and systems information**, including
online application portal activity, email communications, website form submissions, IP address, device information, cookies and analytics data where relevant.

- **Equality, diversity and inclusion information**, including information about disability, ethnicity, gender, age and other information collected for monitoring, support, statutory reporting or equality purposes.

- **Support and adjustment information,** including disability information, reasonable adjustment requests, additional learning support needs, health or wellbeing information that you choose to disclose, and any support arrangements needed during the admissions process.

- **Fraud prevention and verification information,** including identity checks, qualification checks, authenticity checks, plagiarism or false information concerns, and records relating to suspected fraudulent applications.

5. Special category personal information

Some information we use may be special category personal information. This is more sensitive information and receives additional protection under data protection law. The ICO explains that special category data includes information such as health, disability, ethnicity, biometric data, religious or philosophical beliefs, sexual orientation and trade union membership.

We may process special category information where it is necessary for:

- considering reasonable adjustments during the admissions process
- supporting applicants who disclose a disability, health condition or support need
- equality, diversity and inclusion monitoring
- safeguarding or welfare concerns
- assessing eligibility for particular support arrangements
- meeting legal, regulatory or public interest obligations
- protecting vital interests in emergency situations

We will only use special category information where we have a lawful basis under UK GDPR and a separate special category condition under Article 9 UK GDPR. Where required, we will also meet the relevant conditions under the Data Protection Act 2018.

6. Where we collect information from

We may collect personal information directly from you, including through enquiry forms, application forms, interviews, emails, telephone calls, online portals, open days, events, surveys and pre-enrolment communications.

We may also receive information from:

- UCAS or other admissions services, where applicable
- student finance or funding bodies
- recruitment agents or representatives, where applicable
- qualification-checking or verification services
- awarding bodies and validating universities
- UKVI, the Home Office or other immigration authorities, where applicable
- public authorities, regulators, police, courts, local authorities or safeguarding agencies where necessary
- IT systems, website forms, application portals and online platforms

7. Why we use your information

We use applicant and prospective student personal information for the following purposes:

- to respond to enquiries and provide information about SIRM courses and services
- to manage open days, recruitment events and applicant communications
- to process applications and assess eligibility for admission
- to assess whether you meet entry requirements
- to conduct interviews, admissions assessments or selection activities where required
- to verify qualifications, references, identity and information provided in your application
- to assess fee status, funding eligibility and payment arrangements
- to issue offers, manage offer conditions and support enrolment
- to assess and support reasonable adjustments during the admissions process
- to manage visa, CAS, right to study or immigration-related checks where applicable
- to prevent, detect and investigate fraudulent applications or misleading information
- to communicate with you about your application, offer, enrolment and related deadlines

- to carry out equality, diversity and inclusion monitoring
- to meet legal, regulatory, funding, immigration and education requirements
- to support safeguarding, welfare or emergency concerns
- to improve admissions, recruitment and applicant support processes
- to produce statistical and management information about applications, recruitment and admissions

8. Our lawful bases for using your information

We will only use your personal information where we have a lawful basis under UK GDPR. Depending on the activity, we may rely on one or more of the following lawful bases:

- **Contract,** where processing is necessary to provide education, student services and related services to you.
- **Legal obligation**, where we must process information to comply with the law.
- **Public task,** where processing is necessary for education, regulatory, safeguarding or public interest functions.
- **Legitimate interests,** where processing is necessary for SIRM's legitimate interests or those of another organisation, provided your rights and freedoms do not override those interests. This may include managing recruitment, verifying application information, improving admissions processes, preventing fraud and maintaining appropriate records..
- **Vital interests**, where processing is necessary to protect someone's life or safety.
- **Consent,** where we ask for your clear agreement for a specific optional use of your information such as some types of optional marketing communications or optional disclosure of certain support information.

We do not usually rely on consent for core student administration, teaching, assessment, regulatory reporting or safeguarding because these activities are necessary for SIRM to operate as an education provider. Where we do rely on consent, you can withdraw it at any time.

9. Marketing and Communications

We may contact you with information about courses, events, application deadlines, open days, student services and other opportunities that may be relevant to your enquiry or application.

Where required by law, we will only send marketing communications with your consent. In other cases, we may rely on legitimate interests where it is lawful and appropriate to do so.

You can opt out of marketing communications at any time by following the unsubscribe instructions in the communication or by contacting dataprotection@sirm.ac.uk.

Opting out of marketing communications will not stop us sending important service messages about your application, offer, enrolment, visa requirements, fees, deadlines or other essential admissions matters.

10. Who we share your information with

We may share student information where it is necessary, lawful and proportionate. This may include sharing information with:

- awarding bodies and validating universities
- admissions services, where applicable
- qualification-checking and verification services
- schools, colleges, universities or previous education providers
- referees
- student finance, funding or sponsorship bodies
- UKVI, the Home Office or immigration authorities, where applicable
- recruitment agents or representatives, where applicable
- IT, software, cloud, website, application portal and system providers
- external advisers, auditors, legal advisers, insurers and investigators
- local authorities, safeguarding partners, police, courts or emergency services where necessary
- the Office for Students, HESA or other statutory and regulatory bodies where applicable

11. Sharing information with parents, guardians or third parties

Applicants are normally treated as independent adults for data protection purposes. This means that we will not routinely share information about your studies, attendance, progress, fees, conduct, wellbeing or complaints with parents, guardians, family members or other third parties unless:

- you have given clear permission
- there is a legal obligation to do so
- there is a serious safeguarding, welfare or emergency concern

- it is necessary to protect your vital interests or the interests of another person
- there is another lawful basis for sharing the information

Where you want someone else to communicate with us on your behalf, we may ask you to provide written authority before we disclose information to them.

12. International applicants and visa-related information

Where you are an international applicant or require immigration sponsorship, we may process additional information to assess eligibility, meet sponsor duties and comply with immigration requirements.

This may include passport details, visa history, immigration status, right to study information, financial evidence, English language evidence, previous study history, agent information, CAS-related information and records of communications about immigration requirements.

We may share relevant information with UKVI, the Home Office, recruitment agents, qualification-checking services, English language test providers, previous education providers and other bodies where necessary and lawful.

Providing false, misleading or incomplete information may affect your application, offer, enrolment or sponsorship eligibility.

13. If your application is unsuccessful or you do not enrol

If your application is unsuccessful, withdrawn, deferred, declined or you do not enrol, we will keep relevant application records for a limited period in accordance with SIRM's records retention arrangements.

We keep these records to manage queries, appeals, complaints, safeguarding concerns, audit requirements, regulatory requirements, fraud prevention, statistical reporting and future applications.

We will not keep your information for longer than necessary.

14. If you enrol with SIRM

If you enrol with SIRM, relevant information from your application will become part of your student record.

Your student record may include your application, qualifications, offer details, fee status, right to study information, support information, admissions correspondence and enrolment information.

From enrolment onwards, the Student Privacy Notice will also apply to how your personal information is used.

15. International Transfers

Some of the systems and services we use may involve personal information being processed outside the UK.

Where this happens, we will ensure that appropriate safeguards are in place, such as adequacy regulations, standard contractual clauses or other lawful transfer mechanisms.

16. How long we keep your information

We will only keep your personal information for as long as necessary for the purpose for which it was collected, including to meet legal, regulatory, academic, audit, complaint, safeguarding and reporting requirements.

Different types of applicant information may be kept for different periods. For example, enquiry records may be kept for a shorter period than application records, offer records, immigration-related records or records linked to a complaint, appeal or safeguarding matter.

Retention periods are managed in accordance with SIRM's records retention arrangements.

17. How we protect your information

We take appropriate steps to protect personal information against unauthorised access, loss, misuse, alteration or disclosure.

This includes organisational, technical and physical controls such as access restrictions, staff training, secure systems, audit logs, data protection procedures, information security arrangements and controls over the use of third-party systems.

18. Your rights

Under data protection law, you may have the right to:

- be informed about how your personal information is used
- access the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to erase information in certain circumstances
- ask us to restrict how we use your information in certain circumstances
- object to certain uses of your information
- ask for certain information to be transferred to another organisation
- withdraw consent where we rely on consent
- complain to the Information Commissioner's Office

Your rights may depend on the lawful basis we are relying on and the circumstances of the processing. The ICO says privacy notices should explain people's rights clearly, including the right to complain and the right to withdraw consent where consent is used.

To exercise your rights, contact dataprotection@sirm.ac.uk.

19. Complaints about how we use your information

If you are concerned about how we have used your personal information, you should contact us first at:

dataprotection@sirm.ac.uk

You can also complain to the Information Commissioner's Office.
https://ico.org.uk | Tel: 0303 123 1113

20. Changes to this privacy notice

We may update this privacy notice from time to time to reflect changes in law, regulation, SIRM processes, systems, partnerships or services.

Effective from	Last reviewed	Next review due
21 April 2026	21 April 2026	21 April 2027

The most recent version will be published on the SIRM College website.