Student 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 students.

It applies to personal information processed in connection with your studies, your student record, academic progress, support, wellbeing, complaints, conduct, assessment, awards, regulatory reporting, student communications and your wider relationship with SIRM College.

This notice should be read alongside any other privacy information provided to you at the point where your information is collected, including notices relating to specific services, systems, surveys, events, applications, placements, safeguarding, complaints, appeals or investigations.

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, professional bodies, regulatory bodies, funding bodies or placement providers.

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. https://ico.org.uk | Tel: 0303 123 1113 . 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 students:

- **Your identity and contact details,** including name, date of birth, student number, address, email address, telephone number, emergency contact details and photographic identification.
- **Admissions and enrolment information**, including application details, qualifications, references, interview notes, right to study information, immigration or visa information where relevant, fee status, offer information and enrolment records.
- **Academic information,** including course, programme, module, attendance, engagement, assessment submissions, marks, feedback, progression, completion, award outcomes, academic misconduct records, extenuating circumstances, academic appeals and learning support information.
- **Student support and wellbeing information**, including support needs, disability information, reasonable adjustments, wellbeing concerns, safeguarding concerns, fitness to study information, personal tutor records and records of support meetings.
- **Financial information,** including fee records, payment information, sponsorship information, student loan or funding information, debt records and refund information.
- **Conduct and complaints information**, including complaints, disciplinary matters, student conduct concerns, investigations, outcomes and correspondence.

- **Digital and systems information,** including SIRM account details, access logs, learning platform activity, online attendance, email communications, IT usage, CCTV where applicable, and use of SIRM systems and platforms.
- **Equality, diversity and inclusion information,** including information about disability, ethnicity, gender, age and other information collected for monitoring, support, statutory reporting or equality purposes.
- **Regulatory and reporting information,** including information required by awarding bodies, validating partners, the Office for Students, HESA, the Student Loans Company, UKVI, local authorities, the police or other public bodies where applicable.

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:

- student support, wellbeing and safeguarding
- reasonable adjustments and disability support
- equality, diversity and inclusion monitoring
- fitness to study or fitness to practise processes, where applicable
- meeting legal, regulatory or public interest obligations
- protecting vital interests in emergency situations
- preventing or responding to discrimination, harassment, abuse or safeguarding concerns

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 application forms, enrolment forms, student portals, emails, meetings, surveys, support requests and assessment submissions.

We may also receive information from:

- schools, colleges or previous education providers
- awarding bodies and validating universities
- UCAS or other admissions services, where applicable
- student finance or funding bodies
- agents or recruitment representatives, where applicable
- parents, guardians or emergency contacts, where appropriate and lawful
- placement providers or employers, where applicable
- public authorities, regulators, police, courts, local authorities or safeguarding agencies
- IT systems, attendance systems, virtual learning environments and online platforms

7. Why we use your information

We use student personal information for the following purposes:

- to assess applications and manage admissions
- to enrol students and maintain student records
- to deliver teaching, learning, assessment and student support
- to monitor attendance, engagement, continuation, progression and completion
- to manage academic assessment, marking, internal verification, moderation and award processes

- to provide reasonable adjustments, disability support and wellbeing support
- to manage safeguarding, Prevent, fitness to study, student conduct and risk concerns
- to investigate complaints, appeals, academic misconduct and disciplinary matters
- to communicate with students about their course, support, deadlines, services and responsibilities
- to administer fees, payments, refunds, student finance and debt management
- to provide access to IT systems, online platforms, learning resources and student services
- to monitor quality, standards, student outcomes and the student experience
- to meet awarding body, validating partner and regulatory requirements
- to complete statutory and regulatory returns
- to comply with legal duties, including equality, immigration, safeguarding, health and safety, funding and education requirements
- to protect the rights, safety and welfare of students, staff and others

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.
- **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.

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. 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, validating universities and external examiners
- the Office for Students
- HESA or other statutory data bodies
- the Student Loans Company
- UKVI, the Home Office or immigration authorities, where applicable
- Pearson, the University of Salford or other academic partners, where applicable
- placement providers, employers or professional bodies, where applicable
- student finance, funding or sponsorship bodies
- IT, software, cloud, learning platform and system providers
- external advisers, auditors, legal advisers, insurers and investigators
- local authorities, safeguarding partners, police, courts or emergency services where necessary
- debt recovery services, where appropriate and lawful
- the Office of the Independent Adjudicator, where a student complaint is referred to it
- We will not sell your personal information.
- Sharing information with parents, guardians or third parties
- Students 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.

10. 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.

11. 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 student information may be kept for different periods. For example, core student records may need to be retained for longer than routine correspondence or short-term administrative records because they may be needed to confirm study, awards, academic outcomes, regulatory reporting or future references.

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

12. 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.

13. 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.

14. 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

15. 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.

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