

The Representative Body of the Church in Wales
- St. Padarn's Institute (the "Institute")
Student Privacy Notice Updated June 2023

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1. General Information

- 1.1 We are committed to protecting the privacy and security of your Personal data. We have robust information security management systems in place to protect your personal data. We take the security of your information seriously and have implemented appropriate technical and organisational security measures to protect it against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.
- 1.2 This Privacy Notice applies to Personal data we process when you visit or use our website and/or attend courses with the Institute. Further Privacy Policy statements and documents may apply Offline and these are available, if relevant, on request.
- 1.3 We are the “data controller” for the Personal data we process. This means that we hold Personal data about, for example, our students and are responsible for deciding how we store and use that Personal data.
- 1.4 As data controller, we are legally required to provide certain information to individuals whose Personal data we collect, obtain, store and use. That information is contained in this document (our “Privacy Notice”).
- 1.5 It is important that you read this document (together with any other Privacy Notices or Offline hard copy documents we may provide to you on specific occasions), so that you are aware of how and why we are using your Personal data and the rights you have in relation to your Personal data.
- 1.6 The scope of this Privacy Notice applies to all students, Staff and Website visitors relating to St Padarns Institute.
- 1.7 As a Data Controller, we will take all the necessary steps to comply with the UK GDPR and Data Protection Act 2018 and other relevant primary and subordinate legislation and Regulations when handling any personal data which you may provide to us. We are responsible for ensuring that data is:
 - 1.7.1 Fairly and lawfully processed
 - 1.7.2 Processed for limited purposes
 - 1.7.3 Adequate, relevant and not excessive
 - 1.7.4 Accurate and Secure;
 - 1.7.5 Not kept longer than necessary
 - 1.7.6 Processed in accordance with your rights
 - 1.7.7 Not transferred to countries outside the UK without safeguards.
 - 1.7.8 In a manner that ensures appropriate security of the personal data.
- 1.8 We will not sell, rent or otherwise disclose the personal information you provide to us through the site to third parties (other than as listed below) unless we are required to do so by law.

2. What Personal data do we hold about you?

- 2.1 As a student of the Institute we will ask you to provide us with certain Personal data relating to you when you enrol and as you progress through your course.
- 2.2 Data protection law protects Personal data which is essentially any information from which an individual can be identified.

- 2.3 There is a type of Personal data which receives additional protection because of its sensitive or private nature, this is sometimes referred to as ‘special category personal data’ and means Personal data about an individual’s race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual’s health, sex life or sexual orientation.

3. St Padarn’s Students – Full & Part Time – Use of Data Table

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
Your name, address and contact details* Your date of birth* your gender your family details your emergency contact details and next of kin your education and qualifications* your skills and experience financial information* copies of passports visas and other identification documents*	<p>Legal Obligation</p> <p>To monitor engagement of students to ensure compliance with visa requirements and the terms of sponsorship</p> <p>To ensure eligibility to receive financial support from the UK government</p> <p>To ensure compliance with right to study and identification requirements</p> <p>To produce statistics for statutory purposes including supply to the Higher Education Statistics Agency (HESA)</p> <p>Contract</p> <p>To administer your course and</p>	<p>To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it in the first place.</p> <p>In most cases, this means we will keep your information for as long as you are a student and for a period of 6 years thereafter in accordance with the limitation period that applies to contractual claims.</p> <p>We keep information of Completion of Education</p>	<p>Your personal data will be held by the Representative Body of the Church in Wales (branded as St Padarn’s).</p> <p>Your personal data will be provided to us either directly from candidates and students or from other sources such as the Diocese, an Employer or the accrediting university where relevant.</p> <p>We use your Personal data to administer your course and record academic achievements</p> <p>To carry out investigations in accordance with academic and misconduct regulations and to operate security, disciplinary, complaint, safeguarding and quality assurance processes and arrangements which may arise relating to you or others in respect of which you may be able to provide relevant information.</p> <p>To provide you with pastoral and welfare care</p>	<p>If your name and contact details are not provided you will be unable to be appointed as an office holder as we will not be able to provide you with information relevant to your office.</p>

<p>details of courses, modules, timetables, assessment marks and examinations</p> <p>photographs and video recordings your attendance record</p> <p>any other Personal data you share with us, including lifestyle and social circumstances</p> <p>information relating to the provision of advice, support and welfare</p> <p>information gathered for the purposes of equal opportunities monitoring*</p> <p>any reasonable adjustment(s) made to your role or your work under the Equality Act 2010</p>	<p>record academic achievements (e.g. your course choices, examinations and assessments, and the publication of pass lists and graduation programs)</p> <p>To administer financial aspects of your enrolment (e.g. payment of fees, debt collection)</p> <p>To provide or offer facilities and services to students (e.g. computing facilities and the Library)</p> <p>To carry out investigations in accordance with academic and misconduct regulations</p> <p>To operate security, disciplinary, complaint, safeguarding and quality assurance processes and arrangements.</p> <p>Public Task</p> <p>To respond to reference requests</p> <p>To make contact with you after you have</p>	<p>Statement including module marks indefinitely.</p> <p>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.</p>	<p>To make any reasonable adjustments to assist your education</p> <p>In relation to candidates to send reports back to your Diocese</p> <p>In cases where a claim has been brought against the Institute or there is a potential risk of a legal dispute or claim we may need to process your special category personal data where it is necessary for the establishment, exercise or defence of legal claims.</p> <p>There may be circumstances where we need to process your special category Personal data, particularly relating to your health, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.</p> <p>We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.</p> <p>Where appropriate, we will collect information about criminal convictions as part of the enrolment process or we may be notified of such information directly by you during your course.</p> <p>We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary for reasons of substantial</p>	
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<p>CCTV footage and any other information obtained through electronic means</p> <p>Information about your use of our IT, communication and other systems</p> <p>Details of your use of business related social media such as LinkedIn Discernment board report for candidates.</p>	<p>completed your course about alumni membership and events, new developments at the Institute (provided you have not told us that you do not want to receive this information).</p> <p>To provide information to the Higher Education Statistics Agency (HESA) for statistical analysis purposes. -See their relevant Privacy Notice(s) at www.hesa.ac.uk/fpn</p> <p>to monitor your use of our information and communication systems.</p> <p>To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.</p> <p>to monitor equality and diversity.</p>		<p>public interest, namely, preventing or detecting unlawful acts, protecting the public against dishonesty, preventing fraud or suspicion of terrorism or money laundering.</p> <p>Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.</p> <p>Your personal data will be shared internally with other individuals and/or departments where this is reasonably necessary for the processing purposes set out in this document. For example, it will be necessary to share some of your Personal data with other entities within the Church in Wales for example a relevant Diocese for information and reporting purposes.</p> <p>From time to time we will need to share your information with external people and organisations.</p> <p>We will only do so where we have a legitimate or legal basis for doing so and in compliance with our obligations under data protection laws.</p> <p>We may share your personal information with certain third parties who provide services on our behalf. Such 3rd parties are</p>	
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	<p>to provide Public Interest statistical data for HESA</p> <p>Special Category Data</p> <p>Where DBS Checks are conducted they are part of an automated decision making process pursuant to Article 22 UK GDPR.</p> <p>Monitor racial or ethnic origins; religious or philosophical beliefs; physical or mental health (including details of any disability)</p> <p>The commission or alleged commission of any offence, including the results of Disclosure and Barring Service ('DBS') checks</p> <p>Sexual orientation and other special category data collected for HESA purposes.</p> <p>Legitimate interest</p> <p>to process Personal data during the use of video conferencing software</p>		<p>bound by contractual arrangements with Ourselves in accordance with Data Protection legislation and are required to keep your Personal data secure and confidential.</p> <p>They may only use it as permitted by us in accordance with our Privacy Policies and data processor agreements:</p> <p>Relevant Diocese and Parishes of the Church in Wales</p> <p>The Archbishop's Council of the Church of England,</p> <p>Durham University, Cardiff University and the University of Wales, Trinity St David, our education partners in course provision</p> <p>Higher Education Statistics Agency (HESA) for statistical analysis purposes</p> <p>The Office for Students</p> <p>The Higher Education Funding Council for Wales (HEFCW)</p> <p>Student Finance Wales and/or Student Finance England</p> <p>Government departments e.g. the Home Office in relation to student visas</p> <p>Work placement sites</p> <p>The Student Loan Company to confirm enrolment, attendance and identity to enable students to access financial support</p> <p>Debt recovery and control companies in order to recover debt on behalf of</p>	
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	<p>to process personal data in relation to CCTV equipment</p> <p>Our specific legitimate interests are:</p> <p>To protect our business premises. (CCTV)</p> <p>To protect the safety of our employees and visitors to the premises. (CCTV)</p> <p>To assist lawful authorities in the prevention and detection of crime. (CCTV)</p> <p>To facilitate efficient staff and student video and telecommunications. (Video Conferencing)</p> <p>To protect the safety of staff, students and other participants on the call from unnecessary dangers of real world travel. (Video Conferencing)</p> <p>To support our primary purposes of efficient education and</p>		<p>the Institute where internal debt recovery procedures have been unsuccessful</p> <p>UK agencies with duties relating to the prevention and detection of crime, collection of a tax duty or safeguarding national security</p> <p>Plagiarism detection service providers 'Turn-it In'.</p> <p>Other people who help us provide our website, in-house WIFI network, they include information technology experts who design and host our website</p> <p>Our insurers and insurance brokers Ecclesiastical Insurance who provide us with comprehensive cover.</p> <p>Professional bodies and regulators such as JNC</p> <p>Our professional advisors including our accountants when they need it to give us their professional advice.</p> <p>The Police, local authorities, the courts and any other government authority if they ask us to do so (but only if us doing so is lawful).</p> <p>Other people who make a subject access request, where we are allowed to do so by law.</p> <p>Complainants, where this is necessary to respond to any complaints received Where we are legally obliged to do so, e.g. to comply with a court order</p> <p>Prospective employers in response to reference requests</p>	
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	training. (Video Conferencing)		Educational establishments, examination bodies, course providers Your family or representatives Prevent	
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NB: The categories of Personal data denoted by an * above must be provided by you because we have a legal or contractual requirement to obtain and use the information or it is necessary for us to obtain the information to be able to enter into a contract with you.

4. International Transfer of Your Information

- 4.1 We do not generally operate outside of the United Kingdom or transfer any of your personal data outside of the United Kingdom but we may maintain professional contacts in other countries, such as for arranging visits to churches and other learning institutions around the World.
- 4.2 All Personal data and information collected in any State will be processed in the UK.
- 4.3 Due to the operation of the Internet and other computer based applications Personal data under our control may transit countries outside of the UK.
- 4.4 We will only transfer Personal data outside of the UK if adequate safeguards are in place in the destination country.
- 4.5 Where Personal data is transferred to a third country or an international organisation we will ensure that an adequacy decision or similar authority exists between the UK and the relevant country or area.
- 4.6 Where no adequacy decision exists and we rely on the provisions of Standard Contractual Clauses or Binding Corporate Rules evidence of the safeguards provided thereby will be available upon request.
- 4.7 The Main Establishment for all of our Data Processing is the UK.
- 4.8 The lead supervisory authority is UK Law and the UK Information Commissioners Office whose address is Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

5. What Rights You Have Under Data Protection Law

Your rights	What this involves	What our obligations are
A right to be Informed	This is the right to know if we are processing information about you.	Subject to certain exemptions, we must respond to any requests you make to know if we are processing your data.
A right of access	This is a right to obtain access to your personal data and various supplementary information.	<p>We must provide you with a copy of your Personal Data and the other supplementary information without undue delay and in any event within one month of receipt of your request;</p> <p>We cannot charge you for doing so save in specific circumstances (such as where you request further copies of your Personal Data).</p>
A right to have personal data rectified	This is a right to have your Personal Data rectified if it is inaccurate or incomplete.	<p>We must rectify any inaccurate or incomplete information without undue delay and in any event within 1 month of receipt of your request;</p> <p>If we have disclosed your Personal Data to others, we must (subject to certain exceptions) contact the recipients to inform them, that your Personal Data requires rectification.</p>
A right to erasure	<p>This is a right to have your Personal Data deleted or removed.</p> <p>This right only applies in certain circumstances (such as where we no longer need the Personal Data for the purposes for which it was collected). We have the right to refuse to delete or remove your personal data in certain circumstances.</p>	<p>If this right applies, we must delete or remove your Personal Data without undue delay and in any event within one month of receipt of your request;</p> <p>If we have disclosed your Personal Data to others, we must (subject to certain exceptions) contact then recipients to inform them that your Personal Data must be erased.</p>
A right to data portability	<p>This is a right to obtain and re-use your Personal Data for your own purposes;</p> <p>It includes a right to ask that your Personal Data is transferred to another organisation (where technically feasible).</p>	<p>If this right applies we must provide your Personal Data to you in a structured, commonly used and machine reasonable form</p> <p>We must act without undue delay and in any event within 1 month of receipt of your request; We cannot charge you for this service.</p>

	<p>This right only applies in certain limited circumstances.</p> <p>Following a request relating to Data Portability we will transmit the relevant personal data to the data subject or their nominated data controller where it is possible and technically feasible for us to do so.</p>	
A right to object	<p>This is a right to object to the use of your Personal Data.</p> <p>The right applies in certain specific circumstances only.</p> <p>You can use this right to challenge our use of your Personal Data based on our legitimate interests; You can also use this right to object to use of your Personal Data for direct marketing</p>	<p>If you object to us using your Personal Data for direct marketing, we must stop using your Personal Data in this way as soon as we receive your request.</p> <p>If you object to other uses of your Personal Data, whether we have to stop using your Personal Data will depend on the particular circumstances.</p>
A right to object to automated decision making	<p>This is a right not to be subject to a decision which is made solely on the basis of automated processing of your</p> <p>Personal Data where the decision in question will have a legal impact on you or a similarly significant effect.</p> <p>We may use Automated decision making about you if it is necessary for entering into or performing a Contract with you or where you Consent to the actions.</p>	<p>Where such a decision is made, you must be informed of that fact as soon as reasonably practicable;</p> <p>You then have 21 days from receipt of the notification to request that the decision is reconsidered or that a decision is made that is not based solely on automated processing;</p> <p>Your request must be complied with within 21 days.</p>
A right to restrict processing	<p>This is a right to 'block' or suppress processing of your Personal Data.</p>	<p>If we are required to restrict our processing of your Personal Data we will be able to store it but not otherwise use it.</p>

	This right applies in various circumstances including where you contest the accuracy of your information).	We may only retain enough information about you to ensure that the restriction is respected in future. If we have disclosed your Personal Data to others, we must (subject to certain exceptions) contact them to tell them about the restriction on use.
Legitimate Interests <i>Data from sources other than the Data Subject.</i>	<p>If the processing is based on Legitimate Interests, you are entitled to know what and whose Legitimate Interests they are.</p> <p>This lawful basis is used only after conducting a three part test to ensure the data subjects rights are properly protected</p> <p>If we process data about you but we have not obtained the data personally from you, we must provide you with the information described in this Privacy Notice and some additional information.</p> <p>You are entitled to know the source of the information and whether the source is publicly accessible.</p>	<p>There are some exceptions to the additional information rule. If we obtain your Personal Data from a source other than yourself, the additional information rules will apply unless:-</p> <p>You already have the information regarding our processing; or</p> <p>it would take a disproportionate effort or be impossible to provide you with it; or</p> <p>you are already legally protected under separate provisions; or we have a legal duty not to disclose it.</p>

6. Fees payable to exercise your data protection rights.

- 6.1 You will not usually have to pay a fee to access your Personal data (or to exercise any of the other rights).
- 6.2 As soon as we are satisfied as to your identity, we will send you, without delay and in any case within one Month, the Personal Data we hold relating to you, which we are legally obliged to provide.
- 6.3 In the event we need more time to gather the requested information we will let you know without delay and in any event within one month from receipt of your request.
- 6.4 A fee may be payable for Data Access services if the request(s) are manifestly unfounded or excessive or repetitive in nature. Alternatively, we may choose to ignore this type of request. In these cases we will inform you of our decision and if applicable any fee that may be required.

7. Identity information we may need from you

7.1 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

7.2 This is another appropriate security measure to ensure that Personal data is not disclosed to any person who has no right to receive it.

8. Children's data

8.1 Our site is not directed at children and should not be accessed by them.

8.2 We will not knowingly collect information from persons under 13 years of age without their parent's or guardian's consent.

8.3 If a Parent or Guardian of a person under 13 years of age discovers their child has engaged with our Website without their consent, please inform us immediately using the contact details provided below.

8.4 We have considered the elements of the Age Appropriate Design Code (AADC) in relation to our Online activity and concluded that we are not a relevant Information Society Service (ISS) which is likely to be accessed by children.

8.5 There is nothing on our Website which could be damaging to children who view the pages or the pictures.

8.6 The information regarding our products and/or Services such as Educational Courses on our Website is only relevant to adults over the age of 18 years.

8.7 Additionally, we protect the rights of the child in accordance with the UNCRC and the AADC by ensuring no payments can be made on our Website.

9. Accuracy of Personal Data

9.1 If any of your personal details change during the duration of your course you should contact the Operations Manager to notify them and provide them with the updated accurate information.

10. Where to Go if You Want More Information About Your Rights or to make a Complaint

10.1 The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here www.ico.org.uk

10.2 You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.

11. Third Party Websites

11.1 From time to time our site may contain links to and from the websites of our suppliers or other third party sites.

11.2 If you visit any of these sites you should confirm they have their own privacy policies and you should check these before submitting any personal data on their site. We cannot accept any responsibility or liability for the policies on any other Websites.

12. Contact us

12.1 You're welcome to get in touch with us to discuss your information at any time.

12.2 Our full name is The Representative Body of the Church in Wales. We use the branding "St Padarn's Institute" or "St Padarn's" for our educational and training operations.

12.3 We are the data controller of the information you provide us with. The term "data controller" is a legal phrase used to describe the person or entity that controls the way information is used and processed.

12.4 The Representative Body of the Church in Wales as St Padarns institute is Registered with the Information Commissioners Office under reference number Z6056416.

12.5 We have appointed a Data Protection Officer (DPO) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your Personal data, please contact the Data Protection Officer at The Representative Body of the Church in Wales, 2 Callaghan Square, Cardiff CF10 5BT or dataprotection@churchinwales.org.uk

13. Updates to this Privacy Notice

13.1 We review the ways we use your information regularly. In doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

13.2 Consequently, we will need to change this Privacy Notice from time to time to keep it accurate and up-to-date. We will keep this policy under regular review to ensure it is accurate and kept up to date.

13.3 It is the responsibility of the individual visitor to our Website to keep themselves updated with changes to this policy.