Waltham International College

2.0 Compliance



2.10 Privacy Policy for Applicant Data

Version Number:	9
Reviewed by | Approved by:	Compliance Review | BoG
Review date | Approved date:	May 2026 | July 2026

Compliance Alignment Statement

This version of the Privacy Policy for Applicant Data has been aligned to current UK and Office for Students requirements as of May 2026. The substantive changes are listed below.

Version Control Statement

Version	Date	Changes	Reason	Author	Next Review
1	28/10/2018		New Policy	Head of HE	August 2019
2	11/11/2019	Detailed to include General Data Protection Regulation GDPR	General review	Head of HE	August 2020
3	July 2020	Minor changes	Annual review	Head of HE	Jul/Aug 2021
4	August 2021	None	Annual Review	IT Manager	Aug 2022
5	August 2022	e-mail domain updated	Annual Review	IT Manager	Aug 2023
6	September 2023	None	Annual Review	IT Manager	September 2024
7	May 2024	None	Quarter Review	IT Manager	August 2025
8	August 2025	None	Annual Review	IT Manager	August 2026
9	May 2026	- Textual revisions made throughout to bring the policy into compliance with applicable regulations - Changed to New Template - Added External reference and Related Polices List - Added Purpose, Scope and Introduction	Compliance Alignment 2026 (OfS)	QA Compliance Review	August 2027

External Reference Points

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) (PECR)
- Equality Act 2010
- Freedom of Information Act 2000
- Human Rights Act 1998
- Immigration Act 2014 and the Immigration Rules (HC 395, as amended)
- Counter Terrorism and Security Act 2015
- Higher Education and Research Act 2017 (HERA) and the Office for Students (OfS) Regulatory Framework
- Information Commissioner's Office (ICO)
- Higher Education Statistics Agency (HESA) / Jisc
- Quality Assurance Agency for Higher Education (QAA)
- Competition and Markets Authority (CMA)
- UK Visas and Immigration (UKVI)

Related Policies and Documents

Affects all other policy documents. This document should however be read together with the following documents:

- 1.12 Prevent Policy and Strategy
- 1.13 Equality and Diversity Policy
- 2.04 eSafety Policy
- 2.05 Data Protection and Retention Policy (includes Student Privacy Notice)
- 2.07 ICT Policy
- 2.08 Information Security Policy
- 2.09 Incident Response Policy
- 2.13 IT Asset and Equipment Policy
- 3.01 Recruitment, Selection and Admission Polic
- 3.02 Marketing Channels Policy
- 4.06 Complaints Policy
- 4.13 Disability and Inclusion Policy
- 4.16 Malpractice and Maladministration Policy

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1. Purpose

This Privacy Notice sets out how Waltham International College Ltd (WIC / the College) collects, uses, stores, shares, and protects the personal data of individuals who apply for a place of study at the College. It explains the lawful bases on which we process applicant data, how long we retain it, and the rights available to data subjects under applicable data protection legislation. The College is committed to processing personal data in a transparent, fair, and lawful manner in accordance with our obligations as a registered higher education provider.

2. Scope

This Privacy Notice applies to all individuals who submit an application to study at Waltham International College Ltd, whether for undergraduate, postgraduate, or short-course programmes, irrespective of mode of study (full-time, part-time, or online). It covers all stages of the admissions process, from initial enquiry through to enrolment or withdrawal of an application.

- Who it applies to: All prospective and current applicants to WIC programmes, including those applying directly, through agents, or via clearing. It also applies to individuals who make an enquiry that results in the processing of personal data, and to any third parties (such as parents or guardians) who provide data on behalf of an applicant.
- What it covers: The collection and processing of personal data in connection with admissions activities, including receipt and assessment of applications, communication with applicants, verification of qualifications and identity, right to study checks, conditional and unconditional offer management, enrolment, and the administration of applicant records prior to and following registration.
- Where it applies: This Notice applies across all WIC campuses (London and Birmingham), online and digital channels (including the College website, email, and portals), and where processing is carried out by third parties acting on the College's behalf, including admissions agents, awarding body partners, and IT system providers.
- When it applies: This Notice is effective from the point at which an individual submits an application or enquiry to the College and continues to apply throughout the admissions cycle, including after a decision has been made. Where an applicant transitions to enrolled student status, the College's Student Privacy Notice takes effect for the purposes of ongoing data processing during the period of study.

3. Introduction

WIC is committed to protecting the privacy and personal data of all individuals with whom it engages, including those who apply to study at the College. As a data controller registered with the Information Commissioner's Office (ICO), WIC has a legal obligation under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 to ensure that personal data is collected, processed, and retained lawfully, transparently, and securely. This Privacy Notice has been prepared in accordance with those obligations and reflects the College's wider commitment to data protection as a matter of good governance and regulatory compliance. The processing of applicant data is essential to the College's ability to assess applications, make informed admissions decisions, comply with its obligations as a registered higher education provider under the Office for Students (OfS) Conditions of Registration, and fulfil statutory duties including right to study verification, HESA data

reporting, and safeguarding. The College processes only the personal data that is necessary for these purposes, retains it for no longer than required, and takes appropriate technical and organisational measures to protect it against unauthorised access, loss, or disclosure. This Notice should be read in conjunction with the College's Data Protection and Retention Policy (2.05) and any supplementary privacy information provided to applicants at the point of data collection.

4. Who We Are and How to Contact Us

Waltham International College Ltd (WIC / the College) is the data controller for the personal data described in this privacy notice. We are registered with the Information Commissioner's Office (ICO) under reference **ZA110203**.

If you have any questions about how we use your personal data, or to exercise any of your data protection rights (see Section 12), please contact us:

- By email: **info@wic.ac.uk**
- By post: **Data Protection, Waltham International College Ltd, Glebe House, Vicarage Road**, **Barking, IG11 7NR**

For independent advice or to raise a concern about how your personal data is being handled, you may also contact the Information Commissioner's Office (ICO), the UK's data protection supervisory authority, at **www.ico.org.uk** or by telephone on **0303 123 1113**.

5. Personal Data We Collect

5.1 Categories of Personal Data

We collect and process the following categories of personal data about applicants and students:

Category	Examples
Identity data	Full name, date of birth, gender, national insurance number
Contact data	Home address, email address, telephone number
Identification data	Passport, national ID card, visa, biometric residence permit
Educational data	Prior qualifications, grades, previous institutions, UCAS number
Programme data	Course enrolled, attendance, assessment results, academic progress, tuition records
Financial data	Fee status, payment records, Student Loans Company reference, bank account details (for refunds)
Equality and diversity data	Ethnicity, religion, disability status, sexual orientation (where voluntarily provided)
Immigration data	Visa status, right to study evidence (for Home Office compliance)
Communications	Correspondence with the College, including emails, letters, and complaints
IT and security data	Login records, use of College IT systems, CCTV images (on-campus)

5.2 Special Category Data

We may also process special category data (as defined by UK GDPR Article 9), where necessary:

- Disability and health information: to arrange reasonable adjustments, support needs assessments, and comply with the Equality Act 2010
- Ethnic origin, religion/belief, sexual orientation: for equality monitoring purposes (under the Public Sector Equality Duty) - this data is processed in anonymised or aggregated form wherever possible

Special category data is only processed where there is an appropriate lawful basis (see Section 3) and, where required, explicit consent.

6. Lawful Bases for Processing

Lawful Basis	When We Use It
Contract (UK GDPR Art. 6(1)(b))	Processing necessary to assess your application, enrol you, deliver your programme, and administer your student relationship
Legal obligation (Art. 6(1)(c))	Compliance with Home Office requirements (right to study), HESA/OfS data returns, safeguarding, anti-money laundering, health and safety
Legitimate interests (Art. 6(1)(f))	Improving our services, staff training, fraud prevention, IT security, internal reporting and analysis — where these do not override your interests or rights

Consent (Art. 6(1)(a))	Marketing communications, optional surveys, use of photographs/video — where we always provide a clear opt-in and the right to withdraw consent
Vital interests (Art. 6(1)(d))	In emergencies involving risk to life
Substantial public interest (Art. 9(2)(g))	Processing special category data for equality and diversity monitoring under the PSED

7. How We Use Your Personal Data

We process your personal data for the following purposes:

- Assessing your eligibility to study on your chosen programme
- Communicating with you during the application and enrolment process
- Administering your enrolment, registration, and attendance
- Delivering teaching, learning, and assessment
- Processing fees and managing financial records
- Providing pastoral, academic, and disability support
- Fulfilling our reporting obligations to OfS, HESA, the Home Office, and other regulatory bodies
- Safeguarding and promoting the welfare of students
- Equality and diversity monitoring under the PSED
- Improving our courses, services, and facilities
- IT security, preventing fraud, and ensuring the security of our premises and systems
- Handling complaints, appeals, and disciplinary matters

8. Sharing Your Personal Data

8.1 Regulatory and Statutory Bodies

We are required by law or regulatory obligation to share data with the following bodies:

- Higher Education Statistics Agency (HESA) / Jisc - for statutory data returns
- Office for Students (OfS) - for registration monitoring and compliance purposes
- Student Loans Company (SLC) - to confirm enrolment, attendance, and withdrawal for student finance purposes
- Home Office / UK Visas and Immigration (UKVI) - to comply with sponsor licence obligations for international students
- HMRC - where required by law
- Police and other law enforcement agencies - where legally required or in response to a lawful request

8.2 Awarding Bodies and Partner Institutions

We share relevant data with our awarding bodies (e.g., Leeds Trinity University, NCFE and NCC) to enable registration, assessment, and award of qualifications, as required by the partnership agreement.

8.3 Service Providers

We use third party service providers to support our operations (e.g., IT systems, mailing, printing). These providers act as data processors and are bound by data processing agreements that require them to process data only on our instructions, maintain confidentiality, and implement appropriate security measures.

8.4 Other Disclosures

We may share your data with other organisations in exceptional circumstances, including:

- Where you have given your explicit consent
- Where required to protect the vital interests of you or another person
- Where we are legally required to do so

We will not sell your personal data to third parties.

9. International Transfers

We do not routinely transfer personal data outside the UK. Where any transfer is necessary, we will ensure that appropriate safeguards are in place in compliance with UK GDPR, such as standard contractual clauses or an adequacy decision. We will inform you of any material international transfers and the safeguards in place.

10. Retention of Your Personal Data

Data Type	Retention Period
Application records (unsuccessful applicants)	12 months from the end of the admissions cycle
Student records (enrolled students)	6 years after the end of the academic year in which the student's registration ends (or longer if required by law)
Academic results and transcripts	Permanently retained (or for the lifetime of the institution)
Financial records	7 years from the end of the relevant tax year
Attendance records	3 years from end of enrolment
Complaints and disciplinary records	6 years after resolution
CCTV images	31 days (unless retained for investigation purposes)
Consent forms (marketing/photos)	Duration of consent + 12 months

Data will be securely deleted or anonymised at the end of the applicable retention period.

11. How We Protect Your Data

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, accidental loss, destruction, or disclosure. These measures include:

- Secure IT systems with access controls and encryption
- Staff training on data protection and information security
- Data processing agreements with all third-party processors
- Regular review of our security policies and practices

12. Your Data Protection Rights

Under UK GDPR, you have the following rights in relation to your personal data:

Right	What This Means
Right of access	You can request a copy of the personal data we hold about you (Subject Access Request)
Right to rectification	You can ask us to correct inaccurate or incomplete personal data
Right to erasure	You can ask us to delete your data in certain circumstances (e.g., where processing is no longer necessary)
Right to restriction	You can ask us to restrict processing of your data in certain circumstances
Right to data portability	Where processing is based on consent or contract and is automated, you can receive your data in a machine-readable format
Right to object	You can object to processing based on legitimate interests, including direct marketing
Rights related to automated decisions	You have the right not to be subject to solely automated decisions that significantly affect you
Right to withdraw consent	Where we rely on consent, you can withdraw it at any time — without affecting the lawfulness of processing before withdrawal

To exercise any of these rights, please contact us at info@wic.ac.uk. We will respond within one month. Some rights may be subject to exemptions under the Data Protection Act 2018. We will inform you if an exemption applies.

13. Automated Decision Making and Profiling

We do not make decisions about you based solely on automated processing that have a significant effect on you. If this changes, we will inform you and ensure appropriate safeguards are in place.

14. Cookies

Our website uses cookies. Please refer to our Cookie Policy, available on our Website, for details of the cookies we use and how to manage your cookie preferences.

15. Change to This Privacy Notice

We will update this privacy notice when our data processing activities change or when required by law. We will notify you of significant changes. The current version is always available on our Website at www.wic.ac.uk.

16. How to Complain

If you are unhappy with how we have handled your personal data, you can contact us at info@wic.ac.uk. You also have the right to lodge a complaint with the ICO at www.ico.org.uk, by calling 0303 123 1113, or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

17. Appendices

There are no appendices for this document.