LEITHS EDUCATION

Privacy Notice for Students – Culinary Diploma

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

a) processing is fair, lawful and transparent
b) data is collected for specific, explicit, and legitimate purposes
c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
e) data is not kept for longer than is necessary for its given purpose
f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
g) we comply with the relevant GDPR procedures for international transferring of personal data

B) Types of Data Held

We keep several categories of personal data about you in order to carry out effective and efficient processes. We keep this data in a file relating to each event or course and we also hold the data within our computer systems, for example, our accounts systems.

Specifically, we hold the following types of data:

a) Names and contact details
b) Names and contact details for parents, guardians, carers (where applicable)
c) Date of birth
d) Emergency contact information
e) Dietary requirements
f) Payment details
g) Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
h) Information relating to physical or mental health (where applicable)
i) Photographs (where applicable)
j) Attendance records (including reason for absence)
k) Exam results and qualifications
l) Progress reports
m) Assessment papers
n) Information relating to compliments and complaints
o) Behavioural information
p) CCTV footage
q) Building access records

C) Collecting your Data

You provide several pieces of data to us directly during enrolment and the duration of the Culinary Diploma, for example, your name and address and relevant health information.

In some cases, we will collect data about you from third parties, such as intermediaries who may act as an introducer.

Personal data is kept in secure files or within Leiths IT systems.

D) Lawful basis for processing

The law on data protection allows us to process your data for certain reasons only. These reasons are:

Consent – the individual has given permission, which must be specific and freely given

Contract – processing is necessary to provide services under a contract with the individual

Legal obligation – processing is required by law

Vital interests – processing is necessary to protect someone's life

Public task – processing is necessary to perform a public function

Legitimate interests – processing is necessary for a legitimate business purpose that does not override the individual's rights

In the main, we process your data in order to comply with a legal requirement, in order to perform the contract we have with you or in pursuit of our legitimate interests.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Administering applications, enrolment and participation on a course, including using your name, contact details and other relevant information	Performance of the contract
Delivering educational services, assessing progress, maintaining academic records and communicating with you about your studies	Performance of the contract
Collecting fees and processing payments	Performance of the contract
Making decisions about admissions and suitability for programmes	Legitimate interests
Planning, managing and improving our courses, facilities and student services	Legitimate interests
Managing complaints, disciplinary matters, safeguarding concerns and legal claims	Legitimate interests and Legal obligation
Preventing fraud, academic misconduct and other unlawful activity	Legitimate interests and Legal obligation

Ensuring our administrative, educational and IT systems are secure and protected against unauthorised access	Legitimate interests
Providing student support, wellbeing and pastoral services	Legitimate interests
Maintaining health and safety and responding to emergencies involving students	Legitimate interests and Legal obligation
Sharing information with awarding bodies, regulators or accrediting organisations where required	Legal obligation and/or performance of the contract

E) Special categories of data

We process health and SEND information where necessary to provide reasonable adjustments, support student welfare, ensure health and safety, or meet our legal obligations relating to equality legislation.

Special categories of data are data relating to your:

a) health
b) sexual orientation
c) race
d) ethnic origin
e) political opinion
f) religion
g) trade union membership
h) genetic and biometric data.

Most commonly, we will process special categories of data when the following applies:

a) you have given explicit consent to the processing
b) we must process the data in order to carry out our legal obligations
c) we must process data for reasons of substantial public interest
d) you have already made the data public.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

F) Failure to provide data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you or performing the contract that we have entered into.

G) Who we share your data with

Employees within our company who have responsibility for enrolment, teaching, events, administration of payment and carrying out the performance of a contract will have access to data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data is shared with third parties for the following reasons:

- Awarding Organisations to ensure course certification
- IT Service Providers for administration purposes

We use a number of trusted third-party service providers, including providers of IT systems and communication platforms. In some cases, personal data may be transferred to, stored in, or accessed from countries outside the UK or EEA. Where this happens, we ensure that appropriate safeguards are in place, such as adequacy regulations or approved data transfer agreements, to ensure your personal information remains protected in accordance with UK data protection laws.

H) Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

I) Retention periods

We only keep your data for as long as we need it for, which will be at least for the duration of your engagement with us though in some cases we will keep your data for a period after your engagement has ended. Our retention period is outlined in our data retention policy.

J) Automated decision making

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. We do not carry out automated decision-making or profiling that produces legal or similarly significant effects on students.

K) Data subject rights

You have the following rights in relation to the personal data we hold on you:

a) the right to be informed about the data we hold on you and what we do with it
b) the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests
c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’
d) the right to have data deleted in certain circumstances. This is also known as ‘erasure’
e) the right to restrict the processing of the data
f) the right to transfer the data we hold on you to another party. This is also known as ‘portability’
g) the right to object to processing in certain circumstances.
h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on your rights in relation to your data.

L) Consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

M) Making a complaint

If you have any concerns about how your personal information is handled, please contact our Data Protection Officer in the first instance.

Alternatively, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

N) Data Protection Compliance

Leiths School of Food and Wine Limited is the Data Controller responsible for the personal information described in this notice.

Our appointed Data Protection Officer (DPO) is:

Sophie Kidd

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