# Privacy Policy

**West Herts College Group Privacy Policy**

**Purpose**

The following information explains how West Herts College Group collects, retains and uses any data we collect on you as an individual. Up until 24 May 2018 any personal data held by the Group was used in accordance with the Data Protection Act. Since 25 May 2018 personal data will be kept and used in accordance with General Data Protection Regulations (GDPR).

**1. Data Collection**

**1.1 Direct data collection**

At West Herts College Group we collect your personal data in a limited number of ways at key points. In addition to gaining information from you, online data is also taken from you at moments such as when:

1.1 a You make an enquiry

- For example: a request to send you a prospectus; use our website enquiry forms; register to hear more about opportunities, enquire regarding a course, product or service. We generally collect the minimum amount of personal data to fulfil your request such as your name and your contact information.

1.1 b You apply or enrol to a course

- For example: when you complete an application form or enrolment form. We take only the minimum data required to continue processing your application. Your application data is the information we hold prior to you attending an interview/introduction meeting or paying any course fees. The enrolment stage follows this at the beginning of the course – when you will provide further personal information that we require to enrol you as a student, sign a Learning Agreement to prove the data is accurate and pay any course fees that may be applicable. If you pay online for a course with West Herts College Group, your card details are not shared with or stored by us – this element of the transaction is processed by our chosen third-party provider, PayPal.

1.1 c You sign up/in for an event

- For example: when you register to attend or sign in at an event, we will capture information about who you are and the purpose of your visit to help us improve our events.

1.1 d You apply for a job or commence employment

- We capture relevant information to allow us to undertake pre-employment checks and ensure suitability for the relevant role. During the onboarding process, successful candidates are required to provide information that allows the College to enter into a legal contract of employment.

**1.2 Indirect data collection**

Our monitoring of website activity includes recording user data when interacting with our websites, visits to individual pages and typical user paths through the site. The data we

collect on user interaction with our website is anonymised and provides insight into the performance of web pages.

**1.3 What data we collect**

The categories of student information that we process include:

- personal identifiers and contacts (such as name, unique student number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (prior qualifications, courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)

We collect and use student information, for the following purposes:

- to support student learning
- to monitor and report on student attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for the Department for Education (DfE) data collections

**1.4 Purpose and lawful basis for processing**

The lawful basis we rely on for processing your personal data is public task, under article 6(1)(e) of the UK GDPR.

When we use your special category data it is because we have a substantial public interest.

**2. Cookies, pixels and website tracking**

We use cookies and pixels to optimise your experience on our site to provide social media features and analyse traffic to site pages. Cookies and pixels are small pieces of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing.

This means that when you're browsing for a particular course and leave our site, you might start to see advertisements inviting you back to our website to pick up where you left off or browse similar courses related to those you're interested in. It also enables us to report on the number of visitors to a particular course page, this helps us know which of our programmes are more popular and allows us to shape future provision accurately.

On our website we use first-party cookies, such as GA4, and third-party cookies and pixels through our trusted social media, advertising and analytics partners (such as digital

advertising cookies, social media pixels and retargeting pixels). Users can review our website cookies by using the cookie control feature on the website and opting into relevant cookies.

We do not use cookies to:

- Collect any identifiable information (without your express permission)
- Pass personal data to advertising agencies
- Pass personal data to third parties

You can choose to accept or decline cookies on our website by using the cookie control tool.

**2.2 Using your data**

We utilise Google's Customer Match advertising feature, which allows us to create and target customised ads to users based on their email addresses. By using this feature, we may upload a list of hashed email addresses to Google, which are then matched against Google's user database to serve relevant ads. Please note that while we may use this data for advertising purposes, we do not provide Google with any personally identifiable information beyond the hashed email addresses. Additionally, users have the option to opt out of personalised advertising at the source by managing their Google account settings.

To improve the accuracy and efficiency of address entry on our website, we use a third-party service provided by Loqate, part of GBG. When you enter your address to an application or enrolment form, the information may be securely transmitted to Loqate for real-time validation. This helps ensure that the address data we collect is accurate and complete. Loqate acts as an independent data controller for this processing. You can avoid using the Loqate address verification by ignoring the prompts on our forms and entering your address data manually.

West Herts College uses a third-party AI service provider (OpenAI) to power the website chatbot. Users are not asked for personal information within the chat itself, but message content is not filtered, so any personal data a user chooses to type may be transmitted to the provider. This transfer is covered by a signed Data Processing Addendum with OpenAI, which incorporates Standard Contractual Clauses (and the UK Addendum), providing an appropriate safeguard for the transfer outside the UK in accordance with the College's policy on restricted transfers set out above. OpenAI retains message data for a maximum of 7 days and does not use it to train its models.

Contact details (first name, last name, email address) provided by users to save or return to a chat, or to opt in to marketing, are collected and stored separately from the AI provider, on a UK-based server operated by West Herts College's website/chatbot provider. This data does not leave the UK and is never sent to the AI provider.

Occasionally, we may work with carefully selected third-party partners to contact applicants, students, or their parents/carers on our behalf. These communications may relate to important matters such as confirming enrolment intentions, collecting destination data, or gathering feedback through surveys. We rely on a lawful basis such as legitimate interests or consent, where appropriate, and ensure that all data sharing is governed by strict agreements to protect your personal information. Data is used solely for the stated purpose and is handled securely and confidentially. You have the right to object to this processing or withdraw consent at any time, you can do this when contacted by a partner or by contact the College directly.

**3. Data retention**

We keep your data only for legitimate reasons and processing. The period for this is set, but we will give you the option to grant consent to keeping your data longer than usual so we can stay in touch for an extended period.

Our Retention Schedule is an outline of how long we keep personal data and on whom. This schedule is in line with legitimate interest (i.e. to provide you with a good service). Dates for deletion may be extended with your consent. You can find our full retention schedule here.

**4. Your data rights**

You can:

- Withdraw consent (where this is the College's legal basis for processing/retaining your data).
- Rectify any inaccuracies in personal data we hold about you.
- Access a full summary of your personal data that we process.
- Be forgotten – have your details removed from our systems that we use to process your data. This may have wider impact on your access to personal and learning records, if you wish to be forgotten then we will advise you any wider impact that is known to us.
- Restrict/object to certain aspects of the processing of your data.

Please see https://ico.org.uk/ for further information on the above rights. You may also contact the West Herts College Group Data Protection Officer (DPO) for further information. Access to our other relevant policies and procedures can be found here.

**5. Sharing personal information**

West Herts College Group is legally obliged to share some of your details with third parties, e.g. government funding agencies, exam boards, local authorities and in exceptional circumstances with public services such as the police and other emergency services. We may also share your personal data with previous institutions such as schools, employers or training providers for the purpose of gathering references and other information that relates to your application, enrolment or employment.

We make clear how we process and share user data when it is submitted to us and via relevant policies and agreements, if you require further information on how your data is shared with relevant agencies then you can contact us via info@westherts.ac.uk

**6. Complaints and concerns**

If you have any concerns about how your personal data is being used, then you can contact our DPO. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113ICO

Website: https://ico.org.uk/your-data-matters/how-to-make-a-data-protection-complaint

This policy is reviewed annually. Last reviewed October 2026