Updated August 2026

Northampton College Privacy Notice

How we use student information

What is a Privacy Notice?

A privacy notice is a statement that describes how Northampton College collects, uses, retains and discloses personal information. This Privacy Notice relates to the personal data of students.

To ensure that we process your personal data fairly and lawfully we are required to inform you:

- Why we need your data
- How it will be used
- Who it will be shared with
- What rights you have to control how we use your information

The law determines how organisations can use personal information. The key laws are: the General Data Protection Regulation (GDPR) enforced 25th May 2018 and the Data Protection Act 1998 (DPA).

There are three separate privacy statements relating to individuals who are Northampton College staff, associates, or job applicants:

- Privacy Notice – Employees
- Privacy Notice – Associates
- Privacy Notice – Job Applicants

What will we use your data for?

The categories of student information that we collect, hold and share include:

- Personal information (such as name, date of birth, unique learner number (ULN), national insurance number, address, country of residence, recording of document (e.g. passport) numbers to prove evidence of residency, contact details such as mobile number and email address, prior level of educational attainment, employment status and details, evidence of benefit status and/or low wage (for fee remission), next of kin details and signature)
- Sensitive Personal Data (such as race, ethnicity, sex, learning difficulty/disability, special educational needs information, relevant medical information, nationality, and criminal convictions)
- Study programme/course enrolment details including your in-learning status (e.g. enrolled, withdrawn), achievement outcomes (results) and destination information

- Attendance information (such as sessions attended, number of absences and absence reasons)
- Financial information (such as fees paid for a course, part-payment/invoice agreements), evidence of benefit status and/or low wage (for fee remission)

Why we collect and use this information

We use student data:

- to meet our contractual agreement with the Department for Education (DfE) and the Office for Students (OfS)
- to support student learning
- to monitor and report on student progress and achievement (including accessing completed exam paper scripts from awarding bodies)
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

We also collect personal data in the following situations:

- Open Event registration – so that we can facilitate the event and provide you with an acceptable service
- Visitors to the College – student applicants, associate colleagues, job applicants, stakeholders, dignitaries, external training providers/guest speakers, suppliers and tradespeople
- CCTV – which operates inside and outside the building for security purposes
- When you contact us: enquiries (visitor, telephone, email or online form submission), compliments, complaints, web chat, social media

The lawful basis on which we use this information

We collect and use student information under the lawful basis of **Legal Obligation, Public Task, Contract** and **Legitimate Interest.**

Legislation identifies certain data as being 'special category data'. This means that an organisation must identify, in addition to the lawful basis for using the data, a 'condition' for collecting and processing it.

From a student perspective, the College collects categories of Special Category Data and the table below denotes the lawful basis and condition for collecting these.

Type of Special Category Data	**Lawful Basis - Article 6**	**Condition for processing special category data -**
Health (data in addition to funding body requirements)	**Legal Obligation/Contract** The data processing is necessary for the performance	Article 9: Explicit consent

Type of Special Category Data	Lawful Basis - Article 6	Condition for processing special category data -
Race Ethnicity Learning Difficulties/ Disabilities Criminal Convictions	of a contract to which the data subject is partly or in order to take steps at the request of the data subject prior to entering into a contract The data processing is necessary for compliance with a legal obligation to which the controller is subject The data processing is necessary in order to protect the vital interests of the data subject or of another natural person	Employment or social security/protection requirements Protecting the vital interests of the student or another party The exercise or defence of a legal claim Reasons of substantial public interest Purposes of medical or health care Article 10: To safeguard young people and vulnerable adults from any person who has a criminal conviction or record of behaviour that could post a risk to their safety and well-being. This is in accordance with the Keeping Children Safe in Education Statutory Guidance.

Northampton College has legal obligation to provide the information to the DfE and OfS. The DfE use the information to perform statutory functions on behalf of the Secretary of State as set out in the Apprenticeships, Skills, Children and Learning Act 2009 and for the exercise of functions of the Crown, a Minister of the Crown or that government department.

Storing student data

We hold student data for:

Type of Record	Minimum Retention Period
FACILITIES	
CCTV recordings	One month (or until hard drive is full). CCTV recordings may be burnt to disc and held pending investigation
Financial records (including purchase and sales invoices, bank statements, receipts, payment requests and supporting documents, journals, reports and accounts – electronic and hard copy)	7 years after end of the financial year to which the records relate
ENQUIRIES, APPLICATIONS, ADMISSIONS & INDUCTION	
Records documenting the handling of enquiries from prospective students	One year after course ends

Type of Record	Minimum Retention Period
Records documenting the handling of applications for admission: unsuccessful applications	One year after course ends
PAPERBASED STUDENT FILES COLLATED DURING ACADEMIC CAREER	
Full student records, including documents relating to: - Application/admission - Enrolment/learning agreement/files - Employer Liability/H&S (apprenticeships) - Contact/attendance (paper based) - Change of personal details - Diagnostic/Assessments/ILP - Qualifications on Entry - Transfer, withdrawal or termination of studies - Academic achievements - Reference requests/responses	6 years after course ends unless directly or indirectly (match) funded by the ESF where documents need to be retained until 31st December 2030
ELECTRONIC STUDENT FILES COLLATED DURING ACADEMIC CAREER	
Scanned copy of full student records including documents relating to: - Application/admission - Enrolment/learning agreement/files - Employer Liability/H&S (apprenticeships) - Contact/attendance - Change of personal details - Diagnostic/Assessments/ILP - Qualifications on Entry - Transfer, withdrawal or termination of studies - Academic achievements - Reference requests/responses	10 years after course ends unless directly or indirectly (match) funded by the ESF where documents need to be retained until 31 December 2030. This period may need to be extended.
NETWORK ACCOUNT CREATION	
- Student network account	Current academic year or length of programme, plus 3 months.
- Student home area	
- Student OneDrive account	
MOODLE	
Student account	Current academic year plus 3 months or length of programme.
e-ILP	
- Personal details	One academic year plus the current year.
- Course details	
- Qualifications on entry	
- Exam results	
- Attendance records	
- Additional notes	

Type of Record	Minimum Retention Period
- Progress reviews	
- Learning plan	
- At risk comments/flag	
- Additional Support meetings/strategies	
- Disciplinary details	
- SMART Targets	
PROGRAMME & EXAMINATION ADMINISTRATION (inc Work/Study Placements)	
Documents referring to coursework marks/grades and assessment.	6 years after course ends
Electronic records of coursework assessment marks/grades held within ProMonitor Markbook.	6 years after course ends
Electronic records of coursework assessment marks/grades held outside of ProMonitor Markbook.	6 years after course ends
Records documenting organisation of students' work/study placements.	6 years after course ends
Records documenting organisation of examination facilities (inc. special arrangements); attendance at examinations; handling of impaired performance claims; collation and notification of results.	6 years after course ends
QUALITY ASSURANCE	
Records documenting the conduct and results of disciplinary proceedings against individual students.	6 years after course ends.
Records documenting the handling and results of academic appeals by individual students.	6 years after course ends.
Records documenting the handling of formal complaints & compliments made by individual students.	Last action on complaint plus 6 years.
Records documenting the handling of complaints made by individual students where formal complaints procedure is not initiated.	Last action on complaint plus 3 years.
Electronic and paper Curriculum and Apprenticeship Monitoring Meeting Records.	Current academic year plus 5 years
Electronic records of EV Reports.	Current academic year plus 6 years
Electronic and paper records of IQR reports.	Current academic year plus 5 years
STUDENT SERVICES	
Bursary fund claims and payments	6 years after the end of the course

Type of Record	Minimum Retention Period
Learning Support records	6 years after the end of the course
Additional Support records	6 years after the end of the course
Safeguarding documents/records	Copies of reports, notes, etc, are kept securely locked at all times and then retained until the 25th anniversary of the child's birth, or if the child dies before age 18, for 6 years from the date of death.
	Copies of reports, notes, etc, for 'Children Looked After' are kept for either the 75th anniversary of the child's birth, or if the child dies before age 18, for 15 years from the date of death.
	Copies of reports regarding allegations made against staff are kept securely until at least the 25th birthday of any child or seven years in any other case.
	Records are securely disposed of and a record of disposal kept. Paper records are shredded and electronic records deleted.

Who we share student information with

We share student information with:

- Parents, Guardians and Carers for all students up to and including the ages of 16 and 17.
- Parents, Guardians and Carers including for students who become aged 18 within the academic year if:
    - The student has provided valid consent
    - Another lawful basis existing under UK GDPR
    - Disclosure if required by law
    - Disclosure is necessary to protect the vital interests of the student or another individual
- Office of Standards in Education (OFSTED)
- the Department for Education (DfE)
- Department of Works and Pensions
- Office for Students (OfS)
- Office of the Independent Adjudicator (OIA)
- Prospects (National Careers Service)
- Local and Combined Authorities in England
- Government agencies such as the Home Office, UK Visas and Immigration, Police (including PREVENT counter terrorism) and Social services if deemed necessary (such as safeguarding of young people and vulnerable adults) and within the confines of legislation.
- Work experience and placement organisations
- Employers of students who sponsor learning
- Employers of apprentices
- Employer of other funded work based learning
- University of Northampton
- Learning Curve – sub-contracted distance learning
- Awarding Organisations

Northampton College also has Data Sharing Agreements with a number of organisations where there is an identified lawful basis.

Why we share student information

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We share students' data with The Department for Education (DfE) and Office for Students (OfS) on a statutory basis. This data sharing underpins College funding and allows the DfE to perform statutory functions on behalf of the Secretary of State as set out in the Apprenticeships, Skills, Children and Learning Act 2009 and for the exercise of functions of the Crown, a Minister of the Crown or that government department.

We share information such as students' attendance and details of their progress with parents, guardians and carers unless the student (aged 16-18) specifically asks us not to.

Information sharing with parents, guardians and carers

The College recognises that many students continue to receive support from parents, guardians, or carers.

However, once a student reaches the age of sixteen, the College will increasingly communicate directly with the student regarding their education and personal information.

The College does not automatically disclose personal information to parents or carers simply because the student is under the age of eighteen.

Each request for information will be considered individually.

Students Aged Under 16

Where appropriate, the College will normally communicate with parents or those with parental responsibility regarding educational matters.

Students Aged 16 and 17

Students aged 16 and 17 are generally regarded as capable of exercising their own rights under UK data protection legislation where they have sufficient understanding of the issues involved.

Accordingly, the College will normally communicate directly with the student concerning:

- attendance;
- progress;
- disciplinary matters;
- support arrangements;
- wellbeing;
- examination matters;
- complaints;
- personal information requests.

The College will normally seek the student's views before disclosing personal information to parents or carers unless another lawful basis applies.

Students Aged 18 and Over

Students aged eighteen and over are legally adults.

The College will not normally disclose personal information to parents, carers, or other family members unless:

- the student has provided valid consent;
- another lawful basis exists under UK GDPR;
- disclosure is required by law;
- disclosure is necessary to protect the vital interests of the student or another individual.

Students with Education, Health and Care Plans (EHCPs)

The College recognises that many students with EHCPs continue to receive significant support from parents or carers.

However, under the Children and Families Act 2014, rights relating to an EHCP generally transfer to the young person from the age of sixteen unless they lack capacity to make the relevant decision.

Accordingly:

- the existence of an EHCP does **not** automatically entitle a parent or carer to receive the student's personal information;
- each request will be considered individually;
- the College will consider the student's wishes, capacity, safeguarding obligations and legal duties before making any disclosure.

Where a student lacks capacity to make the relevant decision, the College will act in accordance with the Mental Capacity Act 2005 and other applicable legislation.

Student Consent

Where the College relies upon consent as the lawful basis for sharing personal information. Consent must be freely given, be informed, specific and consent must be capable of being withdrawn. Students may withdraw consent at any time.

Withdrawal of consent will not affect processing carried out before consent was withdrawn.

Requests from Parents

Where a parent, guardian, or carer requests information about a student aged sixteen or over, the College will consider:

- the students' wishes;
- whether the student has capacity;
- the nature of the information requested;
- any safeguarding concerns;
- any statutory duties;
- any legal obligation to disclose.

The College may refuse to disclose personal information where there is no lawful basis for disclosure.

Complaints Made by Parents

Where a parent submits a complaint concerning a student aged sixteen or over, the College may:

- acknowledge receipt of the complaint;
- explain the complaints procedure;
- investigate the matters raised;
- confirm that appropriate action has been taken where appropriate.

However, the College will not normally disclose the student's personal information or confidential educational records without a lawful basis.

Safeguarding Disclosures

The College has statutory safeguarding responsibilities. Personal information may be disclosed without consent where necessary:

- to protect children;
- to protect vulnerable adults;
- to prevent serious harm;
- to comply with statutory safeguarding duties;
- to comply with the Prevent Duty;
- where disclosure is otherwise authorised by law.

Such disclosures will be limited to information necessary for the safeguarding purpose.

Prevent Duty

The College has duties under the Counterterrorism and Security Act 2015.Where necessary, personal information may be shared with relevant agencies for the purposes of preventing individuals from being drawn into terrorism.

Any disclosure will be necessary, proportionate, lawful.

How the Department for Education (DfE) uses your personal data

This privacy notice is issued on behalf of the Secretary of State for the Department for Education (DfE) to inform learners about the Individualised Learner Record (ILR) and how their personal information is used in the ILR. Your personal information is used by the DfE to exercise our functions under article 6(1)(e) of the UK GDPR and to meet our statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009. Our lawful basis for using your special category personal data is covered under Substantial Public Interest based in law (Article 9(2)(g)) of UK GDPR legislation. This processing is under Section 54 of the Further and Higher Education Act (1992).

The ILR collects data about learners and learning undertaken. Publicly funded colleges, training organisations, local authorities, and employers (FE providers) must collect and return the data each year under the terms of a funding agreement, contract or grant agreement. It helps ensure that public money is being spent in line with government targets. It is also used for education, training, employment, and well-being purposes, including research.

We retain your ILR learner data for 20 years for operational purposes (e.g. to fund your learning and to publish official statistics). Your personal data is then retained in our research databases until you are aged 80 years so that it can be used for long-term research purposes. For more information about the ILR and the data collected, please see the ILR specification at Individualised Learner Record (ILR) - GOV.UK

ILR data is shared with third parties where it complies with DfE data sharing procedures and where the law allows it. The DfE and the English European Social Fund (ESF) Managing Authority (or agents acting on their behalf) may contact learners to carry out research and evaluation to inform the effectiveness of training.

For more information about how your personal data is used and your individual rights, please see the DfE Personal Information Charter (Personal information charter - Department for Education - GOV.UK) and the DfE Privacy Notice (Privacy information: key stage 4 and 5 and adult education - GOV.UK)
If you would like to get in touch with us or request a copy of the personal information DfE holds about you, you can contact the DfE in the following ways:
• Using our online contact form https://form.education.gov.uk/service/Contact_the_Department_for_Education
• By telephoning the DfE Helpline on 0370 000 2288
• Or in writing to: Data Protection Officer Department for Education 4th floor 2 St Paul's Place 125 Norfolk Street Sheffield S1 2FJ
If you are unhappy with how we have used your personal data, you can complain to the Information Commissioner's Office (ICO) at:
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can also call their helpline on 0303 123 1113 or visit https://www.ico.org.uk

Learning Record Service (LRS): The information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning Records across England, Wales, and Northern Ireland, and is operated by the Department for Education (DfE) in England. For full details including how your personal information is used please see: https://www.gov.uk/government/publications/lrs-privacy-notices/lrs-privacy-notice

Northampton College Privacy Notice: https://www.northamptoncollege.ac.uk/documents/privacy-notices

Northampton College will process data lawfully and in accordance with GDPR. Our privacy notice tells you what to expect when Northampton College collects personal information, who it shares data with, information about how long we retain your data, and how to change your consent. We need to be able to contact you to progress your enrolment and keep in touch, which we may do through post, email, SMS and telephone. The College reserves the right to communicate with parents/guardians, where appropriate. If you wish to opt out please submit your request in writing to enquiries@northamptoncollege.ac.uk

How the Office for Students (OfS) uses your personal data if you are a Higher Education (HE) student:

OfS privacy statement

The Office for Students (OfS) needs to collect and process personal data about people, including students and staff at universities and colleges and individuals with whom we deal, to operate our daily business, exercise our responsibilities and duties of care as an employer, and to fulfil our statutory functions and duties.

The OfS is committed to protecting your personal information and being clear about what information we hold about you and how we use it.

Who we are

The OfS is the regulator of the higher education sector in England and has certain statutory functions set out in the Higher Education and Research Act 2017.

Why we hold personal information

We process personal information to enable us to fulfil our public tasks, including our responsibilities as the lead regulator for higher education in England. This function is directed by the Secretary of State and is in accordance with our legal obligations, including those described in the Higher Education and Research Act 2017.

We also have a role in monitoring the performance by higher education providers of their Prevent duty under the Counter-Terrorism and Security Act 2015.

Personal information is also used for administrative purposes, the management of our accounts, journalism and media, to promote and run events, consultations and surveys, to support and manage our staff, and to facilitate visitors to our buildings.

The services we provide are directed at learners aged 13 and over.

The OfS is the controller for the personal information we process, unless otherwise stated. As a data controller we determine the purposes and means of the processing of your personal data.

Data Protection Officer's contact details

You can contact our Data Protection Officer by emailing dp@officeforstudents.org.uk or via our postal address:

Data Protection Officer
Office for Students
Westward House
Lime Kiln Close
Stoke Gifford
BRISTOL
BS34 8SR

Please note: the email address may be monitored by other members of the OfS's data protection team. Therefore, please mark any correspondence 'for the attention of the Data Protection Officer'.

Further information can be found here: OfS privacy - Office for Students

Requesting access to your personal data held by Northampton College and your data protection rights

Under data protection legislation, students have the right to request access to information about them that we hold. To make a request for your personal information contact the College Data Protection Officer:

Data Protection Officer
Northampton College
Booth Lane
Northampton
NN3 3RF

Email: dataprotection@northamptoncollege.ac.uk

Tel: 01604 734055

- You will be asked to complete the proforma to assist the College with your request.
- You can ask for your data in either an electronic or paper-based format.
- We will respond to your request within one month of receiving your request.

You also have the right to:

- ask us for copies of your personal information
- ask us to rectify information that you think is inaccurate or incomplete
- ask us to erase your personal information, in certain circumstances
- ask us to restrict the processing of your information, in certain circumstances
- ask that we transfer the information you gave us to another organisation
- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. If, after contacting us with your concerns, you are still unhappy with the way we are collecting or using your personal data, you can contact the Information Commissioner's Office at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline: 0303 123 1113

How to change your details

You can change your personal details and DfE contact details anytime by completing the Change of Details on-line form (via Moodle or the College website) or complete a paper version available from the MIS & Exams office (H2.07, Booth Lane) or for some aspects of data via your e-ILP.

If you wish the College to share your details with another organisation or person not listed on this privacy notice, you will need to complete an Authority to Divulge pro-forma which is available from the MIS & Exams office (H2.07, Booth Lane).

You can also email enquiries@northamptoncollege.ac.uk giving us your full name, date of birth, address and details of the information that you would like to be changed. Your email must be sent from the email address we hold for you.

Changing your mind about non-mandatory data collection

Whilst most of the student information you provide to us is mandatory, the contact information when making an enquiry or attending an open event is voluntary. You can change contact options anytime by completing the Change of Details online form (via Moodle or the College website) or complete a paper version available from MIS & Exams office (H2.07, Booth Lane).

You can also email enquiries@northamptoncollege.ac.uk giving us your full name, date of birth, address and details of the information that you would like to be changed. Your email must be sent from the email address we hold for you.

Contact

If you would like to discuss anything in this privacy notice, please contact the College Data Protection Officer via dataprotection@northamptoncollege.ac.uk.