



LUTHER KING HOUSE EDUCATIONAL TRUST POLICY AND PROCEDURES: DATA USE

General

LKH is registered with the Data Protection Registrar and recognises that the data collected falls within the category of data deemed to be sensitive. Data may be held by one or more of the following departments: Finance, Registry, Reception, Conference Office, Library.

Each department is responsible for keeping an up to date audit that indicates:

- The details of data held
- The lawful basis on which it is held
- The sharing arrangements that may be in place
- The storage arrangements in place

Each department is responsible for:

- Maintaining the security of all data that is held
- Putting in place any necessary data sharing agreements
- Immediately reporting any breach of data security to the Finance Manager

Privacy notices are placed on LKH websites and include details of what information is held, how it is used, and how this information can be accessed and corrected as necessary.

There is a legal right for anyone to request a copy of any data held about them by LKH.

Initial collection of data

Prior to admission, data may be requested on those wanting to study at LKH, including from referees or from the sponsoring college. Data will be used to set up an initial student record, identify if the person may qualify for funding from the Student Loans Company, identify if they may be eligible for accreditation of prior learning or accreditation of prior experiential learning, and identify if they have any special educational needs. Prospective students may request that data on special educational needs not be transferred to members of staff.

The data of those students applying for entry to the Research programme may be shared with the validating University and the members of its research degree committee for the purpose of evaluating applications.

Formal academic study

For those who are enrolled on a programme of study leading to the award of an academic qualification the following policy applies:

1. Data will be kept and may be transferred between LKH, the awarding body for the student's degree programme, placement supervisors, and any other body with responsibilities for and involvement with the programmes of academic study.
2. It is our intention to pass personal data to the Higher Education Statistics Agency (HESA). The data submitted may include sensitive personal data as well as personal data. The basis for processing that data is set out in HESA's Collection Notices. The four purposes for which HESA uses data are as follows: public functions, administrative uses, HESA publications and research. See the HESA Collection Notices for more details, at: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>.
3. LKH may make use of statistical data to help us with our educational provision, but we will always maintain anonymity and students' information will never be sold on to a commercial organisation.
4. Students registering on academic programmes of study validated by an external awarding body should be aware that data will be processed by that institution in line with its own data policies. Further information is available from the awarding body's own website.
5. After a student ends their studies at LKH, the student's records will be retained in line with the validating university's data retention policies. LKH or government appointed agencies may contact current or former students to request information about their future intentions or career. It is the student's right to refuse to provide this information.

Formal and informal study

For all those attending LKH courses or events, whether for an academic qualification or not, the following policy applies:

1. Data will be kept or transferred by or to staff of LKH (including external tutors) for academic purposes and to allow special educational needs to be met.
2. Individual member colleges will be entitled to access all LKH records and files in respect of their students.
3. Records of those who are not registered on an academic course will be retained in accordance with our own internal data retention schedule.
4. With a participant's permission, LKH will contact them to let them know about LKH news, and about activities, events and other opportunities which may be of interest to them.
5. Data may be shared with other external organisations, but only to ensure the smooth running and support of our academic provision (for example, organisations involved in the supply, support and maintenance of our student records systems). Data held will never be sold to any commercial organisation.
6. The LKH websites use cookies, which are small text files inserted onto a computer. These are essential to the operation of the site. Using the sites is deemed to be acceptance of these cookies.
7. The Data Controller for Luther King House Educational Trust is the Finance Officer.

8. LKH operates a closed-circuit television recording system for the purpose of crime prevention. Data is held in accordance with the policy agreed by the LKHET Board and is only supplied to law enforcement agencies involved in the prevention and detection of crime and to no other third parties.

Document title:	Data Use
Reviewed and revised on:	Sept 2019
Approved by:	FMC