



## LSI / IH Portsmouth Student Privacy Notice

### Protection and Use of Student Data

#### Data Protection Act 2018, UK General Data Protection Regulation, and Data (Use and Access) Act 2025

### 1. Introduction and Legal Framework

This privacy notice explains how LSI / IH Portsmouth collects, uses, stores, and protects your personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA 2018)
- Data (Use and Access) Act 2025 (DUAA)
- Privacy and Electronic Communications Regulations (PECR)

'Personal data' means any information relating to you as an identified or identifiable living individual. 'Processing' includes any operation performed on personal data, including collection, storage, use, disclosure, and deletion.

### 2. Data Controller Information

**LSI / IH Portsmouth** is the controller for all personal data we hold and process.

#### Contact Details:

- Address: 2-2A Isambard Brunel Road, Portsmouth PO1 2DU
- Email: [info@lsi-portsmouth.co.uk](mailto:info@lsi-portsmouth.co.uk)
- Phone: +44 (0)23 9229 1811

### 3. Data Protection Liaison Officer

**Data Protection Liaison Officer:** Operations Manager

**Email:** [Sue.Hodgson@lsi-portsmouth.co.uk](mailto:Sue.Hodgson@lsi-portsmouth.co.uk)

**Phone:** +44 (0)23 9229 1811

**Support from Parent Company:** NPTC Group of Colleges

Dwr y Felin Road, Neath, SA10 7RF


Phone: (01639) 648138

Email: [data-protection-officer@nptcgroup.ac.uk](mailto:data-protection-officer@nptcgroup.ac.uk)

### 4. What Personal Data We Collect

#### Standard Personal Data:

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- Personal details (name, date of birth, contact information)
  - Family and social circumstances
  - Education and training records
  - Employment information
  - Financial details
  - Academic progress
  - Attendance records
  - Accommodation preferences and arrangements
  - Examination results

**Special Category Data:**

We may collect and process health information (including disabilities and medical conditions) where necessary and lawful.

**5. How We Collect Your Data**

We obtain your personal data from:

- You directly (applications, forms, communications)
- Third parties with lawful authority:
  - Education agents
  - Universities and educational institutions
  - Companies (for sponsored students)
  - Embassies and consulates
  - Previous educational institutions
  - Examination boards

When we receive data from third parties, we ensure they have lawful authority to provide it to us.

**6. Why We Process Your Data (Legal Basis)**

We process your personal data under the following lawful bases:

**Contract Performance:**

- Student registration and enrolment
- Delivering educational services
- Academic assessment and certification
- Fee collection and refunds

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### **Legal Obligation:**

- Immigration and visa reporting (UKVI/UKBA)
- Attendance monitoring for visa holders
- Regulatory reporting requirements
- Health and safety obligations

### **Vital Interests:**

- Emergency medical situations
- Safeguarding and welfare concerns
- Duty of care responsibilities

### **Public Task:**

- Educational service provision
- Regulatory compliance
- Quality assurance

### **Legitimate Interests:**

- Student support services
- Alumni relations
- Marketing (where not requiring consent)
- Fraud prevention
- Debt collection
- IT system security

### **Consent:**


- Marketing communications
- Promotional photography/filming
- Optional surveys and feedback
- Non-essential data sharing

## **7. Special Category Data - Legal Basis**

We process special category data only where we have:

- **Explicit consent** from you
- **Vital interests** protection
- **Legal claims** establishment/defence

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- **Substantial public interest** purposes
  - **Medical/health care** purposes
  - **Public health** requirements
  - **Archiving/research** purposes with safeguards

## **8. How We Use Your Data**

### **Core Educational Services:**

- Course delivery and academic support
- Assessment
- Qualification certification
- Academic progress monitoring
- Attendance tracking
- IT services access

### **Student Support Services:**

- Accommodation arrangements
- Welfare support
- Disability support services
- Financial support administration

### **Administrative Purposes:**

- Fee collection and refunds
- Timetabling and room allocation
- Communication about course changes

### **Regulatory and Legal Requirements:**


- Immigration compliance reporting
- Attendance monitoring
- Quality assurance
- Health and safety compliance
- Safeguarding obligations

## **9. Data Sharing and Disclosure**

### **Mandatory Disclosures:**

- **UK Visas and Immigration (UKVI):** Attendance and academic progress

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- **Police/Security Agencies:** When legally required
  - **Local Government:** For statutory obligations
  - **Regulatory Bodies:** For compliance monitoring

**Service Providers:**

- **Accommodation Providers:** Contact details and preferences
- **Transport Services:** Travel arrangement details
- **IT Service Providers:** System maintenance and support
- **Financial Services:** Payment processing
- **Medical Services:** Health and emergency information

**Sponsored Students:**

- **Progress Reports:** Academic progress, attendance, and completion status shared with sponsors
- **Legal Basis:** Contract performance with the employer
- **Purpose:** Fulfill contractual training obligations

**Partner Institutions:**

We share relevant academic information with:

- University of Portsmouth
- Kingston University
- Bangor University
- University of South Wales
- University of Chichester
- ICP/Navitas
- Other franchise/partnership institutions

**With Your Consent:**

- Marketing and promotional materials
- References to employers/institutions
- Company progress reports (executive students)
- Third-party service enhancements

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## International Transfers:

When we transfer data internationally, we ensure:

- Adequate protection through UK adequacy decisions
- Appropriate safeguards (Standard Contractual Clauses)
- Binding corporate rules where applicable
- Specific derogations for necessary transfers

## 10. Attendance Monitoring

All students must participate in our attendance monitoring system. This is:

- **Statutory requirement** for visa holders
- **Duty of care** obligation
- **Sponsor reporting** to employers and other sponsors who require minimum attendance levels
- **Service improvement** tool for space and resource management

Non-attendance may be reported to relevant authorities including UKVI.

## 11. Automated Decision-Making and Profiling

We use automated processing in the following ways:

### Online Level Testing:

- **Purpose:** Initial assessment of English language level
- **Process:** Computer-marked online test
- **Human oversight:** All results reviewed in face-to-face interview
- **Decision impact:** Used for course placement guidance only - no student is refused entry based solely on automated testing


### Marketing Communications:

- **Purpose:** Sending relevant course information and promotional materials
- **Process:** Analysis of student demographics, course history, and interests
- **Content:** Targeted emails about courses and services that may interest you
- **Opt-out:** Available at any time

### Attendance Monitoring:

- **Purpose:** Early identification of attendance concerns
- **Process:** Automated flagging when students miss more than 20% of classes in a week

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- **Action:** Generates alerts for academic staff review and potential student contact
  - **Reporting:** May trigger reporting to sponsors, UKVI, or other relevant authorities

#### **Your Rights Regarding Automated Processing:**

- Request human intervention in any automated decision
- Express your point of view about automated assessments
- Challenge automated decisions that affect you
- Receive clear information about the logic involved
- Object to profiling in certain circumstances

No Solely Automated Decisions: If solely automated decisions are introduced in the future, students will be informed, given the right to challenge the decision, and request human intervention in accordance with DUAA 2025.

## **12. Data Retention**

#### **Permanent Records:**

- Basic academic achievement records (retained permanently to support returning students, verify past qualifications, and respond to future academic or administrative requests)
- Certificates issued
- Essential identity verification data

#### **Defined Retention Periods:**


- **Application records:** 3 years from decision
- **Student files:** 6 years from course completion
- **Financial records:** 7 years from last transaction
- **Attendance records:** 5 years from course end
- **Disciplinary records:** 6 years from resolution
- **Health records:** 8 years from last contact

Full retention schedule available on request from our Data Protection Liaison Officer.

## **13. Your Rights**

You have the following rights regarding your personal data:

#### **Right of Access:**



Request copies of your personal data we hold (subject to the DUAA 2025 standard of reasonable and proportionate effort)

**Right to Rectification:**

Correct inaccurate or incomplete data

**Right to Erasure:**

Request deletion where no legitimate reason exists to retain data

**Right to Restrict Processing:**

Temporarily halt processing in specific circumstances

**Right to Data Portability:**

Receive your data in machine-readable format

**Right to Object:**

Object to processing based on legitimate interests or direct marketing

**Right to Withdraw Consent:**

Withdraw consent for consent-based processing at any time

**Rights Related to Automated Decision-Making:**

Object to solely automated decisions with legal/significant effects

**To exercise these rights, contact our Data Protection Liaison Officer.**

## 14. Complaints Handling

**How to Complain:**

- **Email:** sue.hodgson@lsi-portsmouth.co.uk
- **Written complaint:** To our Data Protection Liaison Officer
- **Phone:** +44 (0)23 9229 1811

**Our Response:**


- **Acknowledgment:** Within 30 days
- **Investigation:** Without undue delay
- **Resolution:** Formal response with outcome

**External Complaints:**

If unsatisfied with our response, you may complain to: **Information Commissioner's Office (ICO)**

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- Website: [www.ico.org.uk](http://www.ico.org.uk)
  - Phone: 0303 123 1113

## 15. Surveys and Feedback

### Student Feedback:

- **Participation:** Voluntary
- **Purpose:** Service improvement
- **Confidentiality:** Internal use only (except sponsored students)
- **Sponsored students:** Feedback may be shared with sponsors/agents upon request

## 16. IT Systems Monitoring

We may monitor IT systems and user accounts in accordance with:

- Regulation of Investigatory Powers Act 2000
- Human Rights Act 1998
- Data Protection Act 2018
- UK GDPR

Monitoring will be:


- Justified and proportionate
- Legally compliant
- Documented and auditable
- Subject to appropriate safeguards

## 17. Student Use of Personal Data

Students processing personal data for academic purposes must:

- Obtain prior written permission from supervising staff
- Follow LSI data protection guidance
- Comply with UK GDPR principles
- Ensure data security
- Minimize data collection
- Anonymize where possible
- Respect individual rights
- Delete data when no longer needed

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Students are personally liable for any breaches of data protection law.

## 18. Marketing and Communications

### Electronic Marketing:

- **Consent-based:** For prospective students
- **Soft opt-in:** For current students (related services). Students may opt out at any time. Marketing is limited to similar services.
- **Opt-out:** Available at any time

### Promotional Materials:

- **Consent required:** For identifiable individuals
- **Anonymous use:** Permitted for general promotion
- **Withdrawal:** Right to withdraw consent at any time

## 19. Data Security

We implement appropriate technical and organizational measures including:

- **Encryption:** For data in transit and at rest
- **Access controls:** Role-based permissions
- **Staff training:** Regular data protection updates
- **Incident response:** Breach notification procedures
- **Supplier management:** Contractual data protection requirements
- **Regular audits:** Internal and external assessments

## 20. Changes to This Notice

We may update this privacy notice to reflect:

- Legal or regulatory changes
- New services or processes
- Operational improvements


### Updated notices will be:

- Published on our website
- Communicated to current students
- Effective from the date specified

## 21. Contact Information

**For all data protection queries:**

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- **Data Protection Liaison Officer:** [sue.hodgson@lsi-portsmouth.co.uk](mailto:sue.hodgson@lsi-portsmouth.co.uk)
  - **General enquiries:** [info@lsi-portsmouth.co.uk](mailto:info@lsi-portsmouth.co.uk)
  - **Phone:** +44 (0)23 9229 1811
  - **Address:** LSI / IH Portsmouth, 2-2A Isambard Brunel Road, Portsmouth, PO1 2DU

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