

Privacy Notice	
<b>Summary</b>	This privacy notice explains how Bridge School of Business (BSB) collects, uses and shares your personal data, and your rights in relation to the personal data we hold.
<b>Policy owner</b>	Senior Information Risk Owner (SIRO) and Data Protection Officer (DPO) – Academic Registrar
<b>Approval authority</b>	Board of Directors
<b>Applies to</b>	Staff, contractors, agency staff, consultants, volunteers, directors, governors, shareholders, external or independent committee members, independent examiners, invigilators, job applicants, students, applicants, alumni, suppliers, and anyone who accesses BSB systems or whose personal data BSB processes
<b>Version</b>	1.0
<b>Date of approval</b>	11 May 2026
<b>Date of next review</b>	April 2027

### About This Notice

1. This privacy notice explains how BSB collects, uses and shares personal data, and the rights available to individuals whose personal is held. BSB needs to process personal data to:
  - Keep proper records
  - Provide advice
  - Manage and fulfil contracts
  - Comply with legal obligations
  - Pursue its legitimate interests as a provider of higher education
2. BSB also processes financial information in order to make and receive payments, and health and disability information in order to support students, staff, visitors and guests.
3. This Privacy Notice should be read alongside BSB’s Data Governance & Integrity Policy, which explains how BSB ensures data quality, ethical use and governance internally.

### Data Controller and Contact Details

4. BSB is the Data Controller for the personal data covered by this notice.
  - Registered address: 4 Percy Street, London, W1T 1DF
  - ICO registration number: ZB972077
  - Data Protection Officer: [Dick Hetherington, Academic Registrar]
  - DPO email: [DPO@bsblondon.co.uk](mailto:DPO@bsblondon.co.uk)

5. If you wish to raise concerns about this notice or the way BSB processes your personal data, you may contact BSB first using the details above.

### **Scope**

6. This is BSB's core privacy notice. It applies across academic, professional, governance and operational activities, but different parts of it apply to different groups:
  - If you are a student, applicant, or alumnus, it covers student recruitment, admission, enrolment, teaching, assessment, attendance monitoring, progression, certification, graduation, support and alumni engagement
  - If you are a member of staff, worker or job applicant, it covers recruitment, employment or engagement, HR administration, payroll, pensions, health and safety and equal opportunities monitoring
  - If you are a Director, shareholder, volunteer, examiner, invigilator, contractor, consultant, supplier or committee member, it covers governance, committee, contractor and supplier relationships
  - If you access BSB campuses, systems, websites, estates or services, it also covers personal data processed for security and operational purposes, including CCTV and body-worn camera systems.
  - If you are under 18 BSB applies enhanced safeguards and provides age-appropriate privacy information.

### **How BSB Collects Personal Data**

7. BSB may collect personal data in several ways, depending on your relationship with BSB:
  - For students, applicants, and alumni, BSB may collect personal data directly from you when you make an enquiry, apply, enrol, study, graduate or otherwise engage with BSB, and from third parties such as schools, colleges, universities, referees, sponsors, awarding bodies and public authorities
  - For staff, workers, job applicants and officeholders, BSB may collect personal data directly from you during recruitment, employment or engagement, and from third parties such as recruitment agencies, referees, occupational health providers, pension administrators, regulators and public authorities
  - For contractors, consultants, suppliers, volunteers and committee members, BSB may collect personal data directly from you in connection with your services or role, and from relevant referees, professional bodies or public authorities where appropriate
  - For all individuals, BSB may also collect personal data from automated systems and operational records, including websites, student record systems, HR systems, building access systems, CCTV cameras and body-worn cameras used by security staff.

8. Where personal data is not collected directly from you, BSB will process it only where there is a lawful basis to do so and will identify the source category in line with transparency requirements.

### Categories of Personal Data

9. BSB may collect, use, store and transfer different categories of personal data:

<b>Identity and contact data</b>	<p>This may include your name, title, preferred name, contact address, email address, telephone number, date of birth, nationality, passport number, national identity card details, national insurance number, tax identifier, country of domicile, photographs, images and other core identifying details</p>
<b>Student and academic data</b>	<p>For students and applicants, this may include educational history, sixth form, college and university history, courses studied, dates of study, examination results, predicted and actual grades, admissions records, references, student record information, attendance, progression, assessment records, academic misconduct information, bursary and scholarship assessments, library use, IT and information services use, placement records and details relevant to certification and graduation. Each student will be allocated a unique student number by BSB, which will be used as part of BSB's administration of the student relationship</p>
<b>Employment, engagement and governance data</b>	<p>For staff and other workers or officeholders, this may include recruitment records, job title, hours of work, contract information, payroll, pension, absence, appraisals, grievances, disciplinary records, emergency contact details, HESA staff return information, career development details, right to work information, references and role-related records. For some individuals, BSB may also hold copies of driving licences, including date of birth, address, authorised vehicle classes and photograph, where appropriate</p>
<b>Financial data</b>	<p>This may include different types of financial data depending on your relationship with BSB. For students and applicants, this may include fee information, bursaries, scholarships, sponsorships, payment history and debt recovery records. For staff, workers and officeholders, this may include bank details, payroll information, pension information and other payment-related records. For other individuals, it may include financial information relevant to contracts, services or payments made by or to BSB</p>
<b>Personal circumstances and support data</b>	<p>BSB may hold information about your family or personal circumstances where necessary to provide appropriate support. For students, this may include pastoral care, safeguarding, welfare and reasonable adjustments. For staff and workers, this may include occupational support, welfare support,</p>

	safeguarding, emergency contact arrangements and reasonable adjustments. For other individuals, such information will only be processed where relevant to the relationship with BSB
<b>Special category data</b>	This may include health and medical information, disability data, dietary needs, ethnicity, religion or similar beliefs, sexual orientation and other special category personal data as defined by data protection law. For students, BSB may process this information to provide support, safeguarding, welfare services and reasonable adjustments, and to monitor equality where appropriate. For staff, workers and job applicants, BSB may process this information to meet employment law obligations, provide occupational health support, enable reasonable adjustments, monitor equality and protect welfare and safety. For other individuals, BSB will process special category data only where it is relevant and lawful to do so
<b>Criminal convictions and offence data</b>	BSB may process information about criminal convictions and offences, including safeguarding-related information, security incidents, DBS-related information where relevant, and in some staff contexts data connected with convictions shown on a driving licence
<b>Technical, security and surveillance data</b>	This may include website use data, log-in details, IP addresses, system and network use records, CCTV footage, body-worn camera footage, building access logs and records relating to safety or crime prevention

### Why BSB Uses Personal Data

10. BSB uses personal data for a range of academic, employment, governance, administrative, regulatory and security purposes, but not all of these purposes apply to every individual. Some uses apply specifically to students and applicants, some apply specifically to staff, workers and officeholders, and some apply across all groups.

#### Student Purposes

11. If you are a student, applicant, or alumnus, BSB may use your personal data, including special category data and criminal offence data where necessary, for the following purposes:

- Recruitment and admissions, including responding to enquiries before enrolment
- Core teaching and learning, including registration, assessment, attendance, managing academic progress, academic misconduct investigations, certification and graduation
- Maintaining student records

- Assessing eligibility for bursaries, scholarships and similar support
- Providing library, IT and information services
- Providing student support services, pastoral care, disability support, safeguarding and welfare support
- Monitoring equal opportunities
- Ensuring student safety and security, including use of CCTV and body-worn cameras where relevant
- Managing use of social media and operational communications
- Administering finance, including fees, scholarships and bursaries
- Carrying out research, statistical analysis and audits, including compliance-related audits
- Providing operational information such as IT support, safety advice, building closure information and access restrictions
- Promoting BSB services and events on and off campus
- Preventing and detecting crime
- Dealing with grievances, disciplinary matters, complaints and enquiries
- Tracking student progress and attendance where relevant to sponsors, placements, support or regulatory compliance.

#### Graduation and Degree Information

12. If you are a graduating student, personal data including your award and classification may be published in the award ceremony booklet and shared with third parties involved in graduation ceremonies. Published details may also be made available on BSB's archive and website following the relevant graduation events. Graduating students may withhold consent to publication of their name for these purposes when registering online to attend the ceremony or to graduate in absentia. This section applies only to students who are eligible for graduation-related publication.

#### Staff, Contractor and Related Personnel Purposes

13. If you are a member of staff, worker, volunteer, job applicant, contractor, consultant, independent examiner or invigilator, BSB may process your personal data for purposes involving recruitment, administration of employment or engagement, equal opportunities monitoring, statistics, workforce planning, governance, payment, pensions, occupational health, health and safety, security, estates operations and legal or regulatory compliance. Some data may be anonymised, where practicable, for statistical and monitoring purposes. These uses do not apply to students unless they also hold one of these roles.

## Lawful Bases for Processing

14. Core lawful bases BSB may rely on:

Purpose area	Typical lawful basis
Admissions, recruitment and pre-contract engagement	<ul style="list-style-type: none"> <li>• Taking steps prior to entering into a contract</li> <li>• Legitimate interests</li> </ul>
Delivering student education and student services	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legitimate interests</li> <li>• Public task where applicable</li> </ul>
Employment or engagement administration	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legal obligation</li> </ul>
Regulatory reporting, safeguarding and compliance	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Substantial public interest where relevant</li> </ul>
Security, prevention and detection of crime	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Health, occupational health, disability support and welfare	<ul style="list-style-type: none"> <li>• Vital interests</li> <li>• Medical purposes</li> <li>• Substantial public interest</li> <li>• Employment law obligations</li> </ul>
Equality monitoring, statistics and institutional management	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Substantial public interest</li> </ul>
Fundraising and alumni relations	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Consent where specifically required</li> </ul>

15. BSB processes personal data only where there is a clear link between the activity being carried out and an appropriate lawful basis under data protection law. In practice, this means that:

- Student recruitment, admission, enrolment, teaching, assessment, progression, certification and graduation are normally carried out under the performance of a contract or steps taken prior to entering a contract
- Statutory reporting, safeguarding duties, immigration compliance, equality monitoring and regulatory engagement are carried out under legal obligations or substantial public interest conditions
- Student support services, learning analytics, institutional management, security monitoring and operational communications are carried out under BSB’s legitimate interests, where those interests are balanced against the rights and freedoms of individuals

- Marketing choices, alumni engagement preferences and optional publication decisions are carried out under consent where this is required by law.
16. Where BSB requests personal data, this will normally be because it is required to deliver education, employment or governance functions, or to meet legal or regulatory duties. If you are a member of staff, worker or applicant, some information is mandatory and must be provided for contractual or legal reasons; failure to do so may affect whether an offer can be made or continued. Other information, such as certain health, disability, equality or monitoring data, is provided on a voluntary basis and is used to support welfare, compliance or institutional improvement. BSB will explain at the point of collection whether information is mandatory or optional and the consequences of not providing it. Equivalent principles apply to students and applicants for study.
  17. Where BSB processes special category data or criminal conviction data, BSB will also identify the relevant additional condition under data protection law, for example employment law, substantial public interest, safeguarding, equality monitoring, social protection, occupational health or explicit consent.

### **Internal Access and Disclosure**

18. BSB will limit access to personal data to those employees, managers, academic staff, HR staff, finance staff, line managers, agents and contractors who need access for a legitimate operational reason. For students and applicants, this may include relevant academic, student services, safeguarding, finance and compliance staff. For staff, workers and job applicants, this may include relevant HR, finance, line management, compliance and occupational health contacts. If special category data is disclosed during employment, it may be shared with relevant departments or agencies such as Occupational Health with prior knowledge or consent where appropriate. Contact details of BSB staff may be shared with permanent staff where necessary for business operations; this does not apply in the same way to students.

### **Sharing Personal Data with Others**

19. BSB shares personal data only with organisations that are necessary to deliver education and support services, meet legal or regulatory obligations, or support core institutional operations. The recipients involved will depend on your relationship with BSB and the activity being carried out.
20. If you are a student, applicant or alumnus, BSB primarily shares relevant personal data with delivery and oversight partners such as awarding bodies and validating partners, HESA, the Office for Students, the Home Office (where immigration compliance applies), placement providers, sponsors, student support and wellbeing providers, IT and library service providers, survey contractors and tuition-fee-related service providers.
21. If you are a member of staff, worker, officeholder or job applicant, BSB may share relevant personal data with HR and payroll service providers, HMRC, pension fund administrators, the Health and Safety Executive, occupational health providers, HESA where staff returns are required, police or enforcement bodies where relevant, data hosting providers, maintenance and facilities monitoring providers, and third parties carrying out research relevant to the staff population where appropriate and subject to a data sharing agreement.

22. For all individuals, BSB may also share relevant personal data with police, enforcement bodies, crime prevention or detection agencies, competent authorities, auditors, data hosting providers and other third parties involved in administering BSB operations where there is a lawful basis to do so. BSB does not sell personal data and does not permit third parties to use personal data for their own marketing or unrelated purposes.
23. All new processes involving data sharing or hosting, whether they relate to students, staff or other individuals, will be covered by appropriate data sharing agreements or undertakings. Personal data stored or processed by third parties will be subject to agreements intended to ensure appropriate and equivalent protections.

### Higher Education Specific Disclosures

24. The following disclosures are particularly relevant to students, graduates and, in some cases, staff, because they arise from BSB’s role as a higher education provider:

<b>HESA / Jisc and other statutory returns</b>	<p>If you are a student or graduate, BSB may send relevant information about you to HESA, which is responsible for the database in which HESA student records are stored. If you are a member of staff, BSB may also provide staff data to HESA in coded or anonymised form where required. Detailed HESA collection notices can be found here: <a href="https://www.hesa.ac.uk/about/regulation/data-protection/notices">https://www.hesa.ac.uk/about/regulation/data-protection/notices</a></p>
<b>Student surveys</b>	<p>If you are a student or graduate, BSB may pass your contact details to survey contractors to carry out the National Student Survey (undergraduate), Graduate Outcomes, Postgraduate Taught Experience Survey, surveys of student finances, International Student Barometer, and later leaver-tracking surveys. Those contractors should use the details only for those purposes and then delete them. This section applies to students and graduates, not to staff unless they also hold a student relationship with BSB. Students and graduates may choose not to take part in those surveys</p>
<b>UK visas and immigration (UKVI)</b>	<p>If you are an applicant or student whose immigration status is relevant to your study with BSB, BSB may share information with the Home Office in connection with UK visas and immigration. This will not apply to individuals whose relationship with BSB does not involve immigration compliance</p>
<b>Council tax and electoral registration</b>	<p>If you are a student and this is relevant to your circumstances, BSB may disclose relevant student data to council tax authorities and electoral registration officers for the purpose of assessing council tax liability and electoral registration. This section does not generally apply to staff or other categories of individual unless they are also students</p>

<b>Professional bodies, placements and employers</b>	<p>If you are a student, or trainee on a regulated, accredited or placement-based programme, BSB may share relevant data with professional and regulatory bodies, placement providers, awarding bodies and sponsoring employers where necessary for accreditation, registration, conduct, attendance or progress matters. Similar sharing may also apply to staff where required for professional registration or regulatory compliance</p>
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### International Transfers and Cloud Storage

25. Some personal data relating to students, staff or other individuals may be transferred to, and stored at, a destination outside the UK, for example where processed by overseas staff or suppliers or where a supplier uses overseas storage facilities. Where such transfers take place, BSB will only transfer personal data where a lawful transfer mechanism applies, such as adequacy regulations, International Data Transfer Agreements (IDTA), approved transfer clauses or another lawful reason.

### Security and Surveillance

26. BSB may use CCTV across campuses and body-worn cameras worn by security staff during work hours across campuses. This may involve the personal data of students, staff, contractors, visitors and other individuals who are on BSB premises or using BSB facilities. BSB also uses personal data for safety, operational information, crime prevention and detection, and building or asset monitoring.
27. CCTV and body-worn cameras operate in line with ICO surveillance guidance, with signage, restricted access, defined retention and DPIAs where required.

### Automated Decision-making and Analytics

28. BSB uses technology, including algorithms and AI-enabled tools, to support administrative efficiency, service delivery and staff decision-making. Where automated tools are used for applicants, they are limited to clearly defined scenarios, such as checking applications against published eligibility criteria. Decisions that are not clear-cut, that involve professional judgement, or that could significantly affect an individual are reviewed by appropriately trained staff before any final decision is confirmed.
29. For students, learner analytics, risk scoring and attendance alerts are used as decision-support tools only. These systems generate indicators or prompts for review by academic or support staff and do not, by themselves, determine outcomes such as progression decisions, disciplinary action, withdrawal of services or changes to a student’s academic status.
30. BSB may introduce additional digital and AI-enabled tools to support student, applicant and staff services, such as enquiry handling, resource allocation or operational planning. Where these tools involve automated processing or profiling, staff remain responsible for reviewing outputs, checking relevant context and applying professional judgement before action is taken. If any processing could have a legal or similarly significant effect, individuals will be able to seek human intervention, express their point of view and challenge the outcome.

31. Before bringing any new high-impact automated systems into operation, BSB will update this privacy notice (and, where appropriate, provide specific additional information at the point of use) to explain how those systems operate, what data they use, the safeguards in place, and the options available to you.
32. BSB publishes information on any AI-enabled or automated tools in use and will notify individuals of material changes.
33. Students may object to learning analytics processing, and in this situation BSB provides a clear opt-out mechanism and explains the consequences of opting out.

### **Data Retention**

34. BSB retains personal data for different periods depending on the nature of the information, the purpose for which it is used and the level of risk involved. For example:
  - Core academic records confirming awards, classifications and dates of study are normally retained indefinitely to enable verification of qualifications
  - Student finance, complaints, academic misconduct and disciplinary records are typically retained for defined periods after the end of the student relationship, commonly six years
  - Staff employment, contractual and payroll records are retained in line with employment law, tax and pension requirements
  - Routine operational, access-control or monitoring records are retained for shorter periods unless required for legal, safeguarding or regulatory purposes. Full retention periods are set out in BSB's Records Retention Schedule, which is applied consistently across academic and operational systems.

### **Keeping Information up to Date**

35. All individuals should tell BSB promptly about changes to the information BSB holds about them, particularly contact details. If you are a student or applicant, this may include changes to your contact details, immigration status where relevant, sponsorship arrangements, emergency contact details or other information relevant to your studies. If you are a member of staff or worker, this includes contact and identification information, medical condition or disability information, emergency contact details, current job details, absences, bank details, pay history, HESA details and career development details.
36. BSB may collect the contact details of persons nominated for emergency contact purposes. For staff and workers, it is your responsibility to ensure that your emergency contacts have given permission for BSB to contact them in the event of an emergency. For students, emergency contact details may also be collected where relevant to welfare, safeguarding or operational needs.

### **Your Rights**

37. All individuals whose personal data BSB processes, including students, applicants, alumni,

staff, workers, officeholders, contractors and other contacts, have a number of rights in relation to the personal data BSB holds about them, including:

- The right to access information BSB holds and obtain information about how it is processed
- In some circumstances, the right to withdraw consent
- In some circumstances, the right to receive certain information in a portable electronic format and request transmission to another controller
- The right to request rectification of inaccurate or incomplete data
- In some circumstances, the right to request erasure
- The right to object to, and request restriction of, processing in some circumstances
- The right not to be subject to solely automated decision-making with legal or similarly significant effects, where applicable.

38. These rights are subject to conditions and exemptions under data protection law.

#### **Complaints and Further Information**

39. If you wish to raise concerns about this privacy notice or the way BSB processes your personal data, whether as a student, applicant, staff member, worker, contractor or other individual, you should contact BSB using the contact details above.
40. You also have the right to complain to the Information Commissioner's Office, which is the UK regulator for data protection. The ICO's complaints information is available at <https://ico.org.uk/concerns>
41. Where processing practices change in a way that materially affects how personal data is used, BSB will update this privacy notice and, where appropriate, provide targeted notices at the point of collection.

Change Log			
Date	Version Updated	Resulting Version	Details