Privacy Notice – Education Authority
Further Education Grants

Student Financeni is the student finance service provided in Northern Ireland by the Education Authority, funded by the Northern Ireland Executive.
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Education Authority ("EA", "we", "us" and "our")

Data Protection Statement / Privacy Notice (the “Notice”)

PLEASE NOTE: This notice is applicable to customers, students, parents or partners (hereinafter referred to as “you”, “your”, “customer” or “student” as appropriate in the particular context) who have supported an application. The Notice explains how The Education Authority (EA) and others may use personal information (as defined below).

The Department for the Economy, Northern Ireland provide financial assistance to students undertaking approved Further Education courses. Certain functions relating to this Further Education Grants scheme have been transferred to the EA by the Department for the Economy, Northern Ireland.

If you have:

- Made an application for a Further Education Grant through the Education Authority;
- Provided a service to a student, including by way of example without limitation childcare support:

You will have supplied information about yourself (your “personal information”). Your personal information will be held and used by EA to administer the Further Education Grant scheme on behalf of the Department for the Economy, Northern Ireland.

This notice explains how EA and others may use your personal information if you are a customer, student, parent, partner or supplier who has supported an application or provided service(s) to a customer. Throughout the Notice we will refer to you as “customer”, “student”, “you” and “your” as appropriate. Please note personal information is the same as personal data.

Your personal information will be held by EA in accordance with relevant data protection legislation for the purposes as set out in this Notice. It is important that you read this Notice, together with any other privacy notice we may provide on specific occasions when we collect or process your personal information, so that you are aware of how and why we are using such information.

EA is a joint controller of the personal information we collect from you alongside the Department for the Economy, Northern Ireland (together the “Joint Controllers”). This means that we are both responsible for deciding how we hold and use your personal information.

What information do we collect about you?

We may collect, store and use the following categories of personal information:

- Contact details such as name, title, addresses, telephone numbers and personal email addresses;
- Date of birth;
- Gender;
- National Insurance Number (“NINO”);
- Financial data, including bank account details, and annual income details;
- Nationality and residency details;
- Education history;
- Residence history;
- Household details (for example if you have any dependants); and
- Employment status.
We may also collect, store and use the following “special categories” of personal information:

- Information about your race or ethnicity, religious beliefs, and sexual orientation (so that we can, for example, comply with our public sector equality duty under the Equality Act 2010);
- Information about your health, including any medical condition, health and sickness records (so that we can, for example, administer applications for repeat funding due to medical / extenuating circumstances;
- Information about criminal convictions and offences (for example, where this is provided as evidence to support an application or appeal).

We may also collect, store and use the following categories of information about members of your family, including child or adult dependants, in order to assess your eligibility for, and entitlement to, a Further Education Grant:

- Name;
- Date of birth;
- Gender;
- Financial details, including income;
- Nationality and residency details; and
- Childcare or education details.

We may also collect, store and use information about anyone with a Power of Attorney, Court Protection appointed Deputy or consent to act on your behalf. For these purposes we may therefore collect the following categories of personal information:

- Contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Relationship to applicant; and
- Duration of authority/consent

**How is your personal data collected?**

We collect your data in the following ways:

- **When you provide it to us directly**

You may give us your personal information through the Further Education Grant applications, and the Further Education Grant overpayment processes. This information may be provided by you, your partner, relatives (including step-parents) or Attorney/Court of Protection Deputy.

- **When your information is transferred from third parties**

Your personal information may be shared by and/or among the Joint Controllers for the purposes of administering your Further Education Grant application.
We may also collect additional information from third parties including HM Revenue & Customs ("HMRC"); the Home Office; other government departments such as the Department for Communities; and fraud prevention and law enforcement agencies such as the Police and the National Crime Agency.

You should check the privacy policies of the relevant Joint Controller and the other government departments mentioned above (available on their websites) in order to fully understand how they will process your data.

How will we use information about you?

We need this personal information to administer Further Education Grants within the legislative framework set by the Government and the Northern Ireland Assembly. In particular, we need it in order to:

- Process your application for Further Education Grants;
- Determine whether you are eligible for Further Education Grants;
- Make payment of Further Education Grants;
- Maintain accurate and up-to-date records;
- Answer queries you (or your parent(s)/partner) might have in relation to your Further Education Grant application;
- Process any complaint or appeal you submit; and
- Administer and/or pursue the repayment of any Further Education Grant and/or overpayment of any Further Education Grant you receive.

We may also use your information for the following purposes:

- To detect, investigate and prevent crime including fraud using both the information provided to us and publicly available information, such as that on social media and other public platforms;
- Equal opportunities monitoring;
- For research and statistical purposes;
- Allow the assessment and payment of Further Education Grants to be audited;
- Maintain or develop systems and processes; and
- Improving service levels.

Legal Basis for Processing Your Personal Information

We must have a legal basis for processing your personal information (and special categories of your personal information). The legal basis for processing personal information is set out in the data protection legislation. Some of the above basis for processing will overlap with others, so there may be several grounds which justify us using your personal information.

We will primarily process your personal information in order to fulfil our public task of administering Further Education Grants in the UK and to ensure public funds are used appropriately.
EA’s primary roles and performance targets include:

- Using technology and improved business processes to strengthen and streamline the Further Education Grants system;
- Making service improvements and improving the customer experience;
- Delivering changes to Further Education Grants policy; and
- Improving customer satisfaction

We may therefore use your personal information for these purposes, which form part of our public function. Processing your personal information to make payment of Further Education Grants may also necessary for us to fulfil our obligations under any contract you enter into with us to provide a Further Education Grant.

We also have legal obligations under Section 75 of the Northern Ireland Act 1998, for example we must comply with the public sector equality duty. We may therefore use your personal information to fulfil these obligations.

To assist your College in the determination of your eligibility to receive help from the Hardship Fund (which is administered by the College) we will share your personal information, where this is necessary, based on the consent that you have given to us in this respect (provided that you have given consent in this respect and not subsequently withdrawn your consent).

As we process special category data, we must also identify a special category condition for processing. We process special category data where: (i) we have your explicit consent; (ii) it is necessary for the purposes of carrying out our obligations in the field of social security and social protection law; or (ii) it is necessary for archiving purposes in the public interest and statistical purposes.

**Change of Purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider it is necessary to use it for another purpose and that purpose is compatible with the original purpose. If we need to use your personal information for a different purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**Data Sharing**

We may share your personal information with third parties where required by law or where it is necessary to process your application or administer your Further Education Grant. We may share the personal information you have provided as an applicant or parent/partner with:

<table>
<thead>
<tr>
<th>Who we share your information with</th>
<th>Why we share your information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Banks and Building societies</td>
<td>- To make payment Further Education Grants you are entitled to and/or to assess your entitlement to Further Education Grants.</td>
</tr>
<tr>
<td>Childcare Providers</td>
<td>- To verify the information you provide to us as part of any application for assistance with childcare costs and to ensure that the amount of any such assistance is accurate.</td>
</tr>
<tr>
<td>Contracted Third Parties</td>
<td>To help EA meet service delivery needs, we may share your, or your dependants’, personal information pursuant to data sharing agreements which include data protection safeguards.</td>
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<tr>
<td>Fraud prevention and law enforcement agencies such as the police and the Serious Crime Agency (including CIFAS)</td>
<td>To check the accuracy of information provided to us and to prevent and detect fraud both in the Further Education Grants application process and more widely. If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention and law enforcement agencies who may access and use this information.</td>
</tr>
<tr>
<td>Home Office including Her Majesty’s Passport Office and UK Visas and Immigration Agency</td>
<td>To verify your passport or biometric residence permit details and to check the validity of visas, residency and immigration status.</td>
</tr>
<tr>
<td>ID and Income Checking Agencies</td>
<td>To carry out ID and Income checks, to facilitate repayment of student support and for the purposes of detecting fraud.</td>
</tr>
<tr>
<td>Social Security Offices / Pension Branch</td>
<td>To clarify information supplied relating to your social security benefit / pension claims.</td>
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<tr>
<td>Joint Data Controllers:</td>
<td>To provide customer services to you and to monitor the performance of the Further Education Grants system and to develop future policies and/or initiatives.</td>
</tr>
<tr>
<td>Department for the Economy, Northern Ireland</td>
<td>These organisations and EA may share data with third parties for research and statistical purposes. Any published output will be anonymous and will not identify individuals.</td>
</tr>
<tr>
<td>Department of Agriculture, Environment and Rural Affairs (DAERA)</td>
<td>To assess whether you are entitled to receive Further Education Grant for a course at a CAFRE College (College of Agriculture, Food &amp; Rural Enterprise)</td>
</tr>
<tr>
<td>Colleges of Further Education and CAFRE Colleges</td>
<td>To pay any fee support you are entitled to.</td>
</tr>
<tr>
<td></td>
<td>To process your information for the purposes of providing you with a Further Education Grant.</td>
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<td></td>
<td>To verify the details of your course of study.</td>
</tr>
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<td></td>
<td>To check that your attendance meets the required standard.</td>
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<td></td>
<td>To check your withdrawal or suspension date.</td>
</tr>
<tr>
<td></td>
<td>To provide information relating to your Further Education Grant to assist colleges with the administration of claims to the Hardship Fund.</td>
</tr>
</tbody>
</table>
Utility Providers

- To verify evidence you have provided to us.

Hardship Fund

Some students may be eligible for help from the Hardship Fund. Your College will determine whether or not you are eligible to receive help from the Hardship Fund. If you are they will pay the relevant sum to you. In order for your College to determine your eligibility, we may share some of your personal information including your contact details, your financial circumstances and course details as well as some information about your eligibility for Further Education Grants with them if you have consented to us processing your personal information for this purpose and have not withdrawn such consent. If you have consented to us processing your personal information for this purpose but do not now want us to share your information with your College for these purposes, please contact:

The EA’s Further Education Grants Section on (028) 82 254546

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidently lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

EA retains your personal information, and may retain that of your partner and your relatives (including step-parents) in order to:

- Allow the assessment and payment of Further Education Grants to be audited;
- Maintain and develop systems and processes;
- Improve customer satisfaction;
- Provide you with customer services, respond to any questions you may have and update your account information;
- Enable assessment of any future eligibility or entitlement to study;
- Facilitate repayment of Further Education Grants; and
- Respond to requests received from Social Security Offices for information relating to your entitlement to a Further Education Grant.

We will only retain your personal information for as long as it is necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, as well as any relevant legal requirements. In some circumstances we will retain personal data indefinitely, generally for the purposes described above.
Rights of Access, Correction, Erasure, and Restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. You are obliged to let us know if your personal information changes during your relationship with us.

Your rights in connection with personal information

You have the following rights in relation to your personal information:

- **Request access** to your personal information: You have a right to have access to the personal information which we hold about you, subject to certain limitations.

- **Request correction** of your personal information: You have a right to have your personal information corrected, or rectified, if it is inaccurate or incomplete. If you become aware that any of the data which we hold about you is inaccurate, you should contact us as soon as practicable. You must notify us immediately on becoming aware of any change of circumstances which require changes to be made to any of the personal information which we hold about you.

- **Request erasure (or deletion)** of your personal information: You have a right to request the deletion or removal of your personal information where there is no compelling reason for its continued processing. Your right to make such a request will arise in specific circumstances, for example, where data is no longer necessary for the purpose for which it was collected or where you withdraw your consent for processing your data (and this is the sole basis on which your data is processed).

- **Request the restriction of processing** of your personal information: You have a right to block or suppress the processing of your personal information in certain circumstances. If for example you contest the accuracy of the personal data, processing may be restricted until the accuracy of the personal information has been verified. This may also apply where you contest that the processing is unlawful.

- **Request the transfer** of your personal information to another party: You have a right to obtain and re-use your personal information for your own purposes across different services – this is referred to as the right to data portability. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way.

- **Object to us processing** your personal information: You have the right to object to the processing of your personal data if it is based on the performance of a task carried out in the public interest. You also have a right to object where we process your information for research purposes.

If you want to exercise any of these rights, please write to: EA, Further Education Grants, 1 Hospital Road, Omagh, BT79 0AW, outlining the reason for your request. We will consider your request and respond accordingly.
**Right to Withdraw Consent**

In the limited circumstances where you may have provided your consent to us processing your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact: *(028) 82 254546*

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to do so by law, or have another legitimate basis for doing so in law.

**Data Protection Officer and Right to Complain**

We have appointed a Data Protection Officer ("DPO") to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO:

Data Protection Officer
Education Authority
1 Hospital Road
Omagh
BT79 0AW
E: dpo@eani.org.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

**The Information Commissioner’s Office – Northern Ireland**

3rd Floor 14 Cromac Place,
Belfast
BT7 2JB
Telephone: 028 9027 8757 / 0303 123 1114
Email: *ni@ico.org.uk*

**Changes to this Data Protection Statement/Privacy Notice**

We reserve the right to update this data protection/privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.