

# South Central Theological Education Institute (SCTEI) Moodle Site - Privacy and Cookie Policy

This policy pertains to SCTEI's Moodle and not to information held by SCTEI's regional teaching centres (Guildford Local Ministry Programme, Oxford Local Ministry Programme, Sarum College and Winchester School of Mission).

Welcome to SCTEI's Moodle. We take your privacy seriously and are committed to protecting your personal data. This privacy and cookie policy tells you how we deal with your personal data, your privacy and the rights you have when you use this site or supply information to us.

## 1) Important information and who we are

### Purpose of this privacy policy

This privacy notices gives you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website or otherwise.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements any other policies and notices and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

### Data Controller

The data controller is SCTEI, whose legal entity is : Guildford Diocese. Guildford Diocesan Board of Finance is registered with the Information Commissioner, registration number Z8692957.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

- **Name of contact:** Fiona Heard (Academic Registrar SCTEI)
- **Email address:** [acregsctei@sarum.ac.uk](mailto:acregsctei@sarum.ac.uk)
- **Postal address:** Church House Guildford, Alan Turing Road, Guildford, GU2 7YF.

### Your obligation to inform us of changes

It is important that the personal data we hold about you is accurate and current. If your data has changed, please inform the course administrator in your regional centre. (i.e. *Winchester*

*School of Mission; Local Ministry Programme: Oxford; Centre for Formation in Ministry, Sarum; or Local Ministry Programme, Guildford).*

## **2) The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Required Personal Data** This is your first name, last name, username, email address, location via your internet protocol (IP) address.

**Optional Personal Data** You may add more personal data to your profile on this site, including a photograph.

**Academic Programme Data** We store information about your academic programme, including length of course, start and end dates, prior learning credits, programme of study and University identification number.

**Material submitted by you as part of your studies** This includes essays and other assessed pieces of work. It also includes forum posts, quizzes and feedback forms. This will always include the time and date of submission.

**Marks and assessment feedback** All of your marks and comments by your tutors will be stored.

**Technical Data** When you use our Moodle site we automatically collect your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Usage Data** Moodle records information about how you use our website, resources viewed, activities undertaken and materials accessed.

## **3) How is your personal data collected?**

We use different methods to collect data from you including

- a) Personal data provided outside of Moodle, for example when you began your studies
- b) Voluntary data you add to the Moodle site by editing your profile
- c) Data you add as part of your studies by submitting work for assessment, participating in forums or other learning activities
- d) Marks and comments added by tutors as part of the assessment processes
- e) When you use this Moodle site we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using

server logs. We also collect details of all your actions within Moodle through the logs built into Moodle.

#### 4) Purpose and lawful basis for using your personal data

<b>We use your data for the following purposes and with the listed lawful bases: Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis</b>
To provide you with services to support your learning	Required Personal Data Academic Programme Data Communications Data	Your implicit contract with us to provide you with a programme of study
To enhance your interactions with other students	Required Personal Data Optional Personal Data Communications Data	Your implicit contract with us to provide you with a programme of study, and in the case of optional personal data, your consent.
To assess your work and provide an academic award	Required Personal Data Academic Programme Data Material submitted by you as part of your studies Marks and assessment feedback	Your implicit contract with us to provide you with a programme of study
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Required Personal Data Technical Data Usage Data	Legitimate interests (provision of administration and IT services, network security)
To use data analytics to improve our website	Technical Data Usage Data	Legitimate interests (to monitor and improve this service)

#### 5) Data Sharing

With Durham (for those on the Common Awards programme. Durham's policies in relation to GDPR can be found on the Durham University Common Awards website, under 'Students', GDPR information.)

With Ministry Division (related to funding)

With Turnitin (for plagiarism checking and marking)

With Guildford Diocese as the legal entity for SCTEI (as some material is stored on their server)

#### 6) Data Security

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

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

## 7) Data Retention

Student accounts are suspended but kept on Moodle for five academic years after a student has exited from a programme.

## 8) Your rights and your personal data

- The right to request a copy of your personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of your personal data
- The right to request a copy of your personal data in a portable format
- The right to lodge a complaint with the Information Commissioners Office. (see below)

## Complaints

If you have any complaints or queries about matters affecting your privacy, or any other general data protection matters, then please do let us know by contacting us as set out above and we will endeavour to resolve the problem.

In any event 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 can be contacted on their helpline number which is 0303 123 1113 between 9am and 5pm Monday to Friday, or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF, Or by other contact methods as set out on their website. Please go to their website at [www.ico.org.uk](http://www.ico.org.uk) for more information.