
Privacy Notice for Short Course Unit

13 May 2026



Introduction

1. This Privacy Notice applies to Bath Spa University's registered and non-registered on short courses delivered by the Short Course Unit. Bath Spa University (the University) is a public university which has its main campus at Newton Park, Newton St Loe, Bath, BA2 9BN.
2. We are committed to safeguarding the privacy of our learners; this Notice explains how we will collect and use your personal information when you apply, register or enrol for a short course delivered by the Short Course Unit. We are the data controller, which means we are responsible for deciding how we collect and use your personal information.
3. If you have any questions about this Notice or how we use your information, please contact the University's Information Compliance Team at data-protection@bathspa.ac.uk. You can also write to Bath Spa University, Newton Park, Newton St Loe, Bath, BA2 9BN.
4. Please see the [policy section of our website](#) to access our Data Protection Policy and our other privacy notices (including privacy information for our website users).

What data do we hold?

5. We collect and use personal data (and, where relevant special category data and criminal offence data) for the purposes of providing learning services to you. This includes:
 - Contact details (for example name, address, email address and telephone number)
 - Personal details such as date of birth, age, ethnicity and nationality (where relevant)
 - Information about your prior and current education, work experience and any relevant qualifications
 - National Insurance number and related employment or funding information (where required for eligibility checking, funding or audit purposes)
 - Information about disabilities, caring responsibilities or dietary requirements (where you choose to provide this to help us support you)

- Records of when you contact us (and when we contact you) and the reasons why
- Identity information (for example copies of identification documents where required, and photographs if used for ID or course administration)
- Criminal offence information (only where relevant to the course and where we are permitted to process it)
- Your course performance and assessment details
- Attendance and engagement with learning and teaching, including use of our virtual learning environment
- Event registration and attendance
- Exams undertaken and results
- Surveys and feedback
- Any exceptional circumstances or specific support needs
- (If applicable) details of any grievances, misconduct or breaches of codes of conduct (including logs and security monitoring where permitted)
- Information about your use of our information and communications systems (including logs and security monitoring where permitted)
- We may also receive personal information about you indirectly in some circumstances, for example from:
 - Funders that we work with to provide publicly funded short courses, where this is required to meet our contractual obligations with that funder.
 - The Learning Records Service (LRS), part of the Department for Education, which supports publicly funded adult education.

6. The information we collect will vary depending on the short course you apply for or enrol on, and whether the course is self-funded or publicly funded. Different application, enrolment and learner-management systems may be used for different course types, and this may affect the information collected and the way it is recorded.

Why do we process your personal data, and what is the legal basis for that processing?

7. The legal bases we are relying on for collecting and processing the information for each of the purposes are as follows:

PURPOSE OF COLLECTING INFORMATION	LEGAL BASIS FOR PROCESSING INFORMATION
Verify your identity	Contract - Processing personal data to verify your identity is necessary in order to take steps at your request prior to entering into a contract and, if successful, to fulfil that contract. Identity verification ensures that we

	<p>are dealing with the correct individual throughout the application and enrolment process and supports the secure provision of our services.</p> <p>Legal Obligation - Where identity checks are required to meet regulatory, funding, or audit requirements (for example, for publicly funded provision or fraud prevention).</p> <p>Legitimate Interests - Where necessary to protect the University's legitimate interests in preventing fraud, maintaining the security of its systems and services, and ensuring the integrity of its student records, provided these interests do not override your rights</p>
<p>Assess your eligibility to join one of our Short Courses, including setting up interviews virtually as part of application administration and management.</p>	<p>Contract - Processing personal data to assess your eligibility, suitability, and to arrange interviews is necessary to take steps at your request prior to entering into a contract. This enables the University to determine whether you meet the requirements for the Short Course and to administer the application process effectively.</p> <p>Public Task - Where processing is necessary for the University to carry out its functions as a higher education provider, including ensuring fair and consistent admissions processes.</p> <p>Legitimate Interests - Where it is necessary for the efficient administration and management of applications, including organising and conducting interviews, provided this does not override your rights.</p>
<p>For the administration of your position as a learner and to provide appropriate support whilst learning.</p>	<p>Contract - Processing personal data to administer your position as a learner and provide appropriate support is necessary to fulfil the contract between you and the University. This includes delivering teaching, maintaining your student record, and ensuring you receive appropriate academic</p>

	<p>and pastoral support throughout your studies.</p> <p>Public Task - Where processing is necessary for the University to carry out its functions as a higher education provider, including supporting student learning, progression, and wellbeing.</p> <p>Legitimate Interests - Where it is necessary for the effective management of courses and student services, including monitoring engagement and providing support, provided this does not override your rights.</p> <p>Special category data (Article 9) - where applicable If support requires special category data (for example health or disability information), processing will rely on an appropriate Article 9 condition. In most cases this will be:</p> <p>Article 9(2)(g) - Substantial public interest (equality of opportunity, support needs), or</p> <p>Article 9(2)(a) - Explicit consent, where appropriate</p>
<p>To meet funding requirements, for learners on publicly funded courses</p>	<p>Legal Obligation - Processing personal data is necessary to comply with legal and regulatory requirements placed on the University by external funding and regulatory bodies. This includes collecting, recording, and sharing information required to demonstrate eligibility for funding, monitor participation, and meet audit and reporting obligations.</p> <p>Public Task - Where processing is necessary for the University to carry out its functions as a higher education provider, including the delivery and administration of publicly funded education.</p> <p>Contract - In some cases, where funding is integral to your participation in the course,</p>

	processing may also be necessary to fulfil the terms of your enrolment.
--	---

8. Where we process special category personal data about you (for example health, disability or equality monitoring information), we will identify a specific UK GDPR Article 9 condition and, where required, a Data Protection Act 2018 Schedule 1 condition. The most relevant conditions for the Short Course Unit are likely to include:

- Equality of opportunity or treatment (Article 9(2)(g) - substantial public interest, with Schedule 1 condition), for example to make reasonable adjustments and support needs.
- Safeguarding of children and individuals at risk (Article 9(2)(g) - substantial public interest, with Schedule 1 safeguarding condition), where applicable.
- Archiving, research and statistical purposes (Article 9(2)(j)), where we carry out such processing with appropriate safeguards.

Who has access to your personal data?

9. We may share your personal data with the following categories of recipients, where this is necessary for your short course application, enrolment, delivery, learner support, or to meet legal, regulatory, funding or audit requirements:

- a. University staff involved in administering, delivering and supporting short courses (for example the Short Course Unit, Finance, IT, and student support services where relevant)
- b. Suppliers who provide systems and services on the University's behalf (for example learner management, virtual learning and secure IT services)
- c. Professional advisers (for example legal, audit or insurance advisers) where necessary
- d. Funders and delivery partners where you are enrolled on publicly funded provision and information must be shared to meet contractual, reporting and audit obligations
- e. Public bodies or regulators where we are required by law to provide information

10. We will only share your information where we have a lawful basis to do so, and we will ensure any suppliers processing information on our behalf are subject to appropriate contractual obligations and security requirements.

11. If you ask to receive updates about future short courses (for example by completing an expression-of-interest or mailing list form), we will use your contact details to send those updates. You can opt out at any time by using the unsubscribe option in the message or by contacting us using the details in this Notice.

Transfer of Data to Other Countries

12. Occasionally the University may need to transfer personal data to organisations outside the UK (and outside the European Economic Area (EEA)). Where we do this, we will ensure an appropriate transfer mechanism is in place, such as adequacy regulations, the UK International Data Transfer Agreement (IDTA) or other approved safeguards, and that only the minimum necessary data is transferred. Transfers are usually required to deliver services to you (for example where a service provider is based overseas) or to meet contractual, legal or regulatory requirements.

Information Security and Retention Period

13. Your personal data is collected and stored in line with relevant Data Protection law and is stored securely using processes and systems that comply with the University's strict information security and data protection principles.

14. We will only keep your personal data for as long as it is needed for the purposes set out in this Notice, and in line with relevant legislation and the University's retention schedule. For learners on publicly funded courses, funding and audit requirements may mean we need to retain some records for longer. As a guide, core Short Course Unit records are normally retained for up to 3 years after the end of the course, unless a longer period applies (for example where required for funding, legal claims or statutory reporting). Where different retention periods apply (for example for publicly funded learner records), we will apply the relevant funder or statutory requirement alongside the University's retention schedule.

15. Where we process criminal offence data (for example where this is relevant to a particular course and permitted by law), we will do so in line with Article 10 UK GDPR and the Data Protection Act 2018, and we will apply appropriate safeguards and access controls.

Automated Decision Making

16 Information collected will not be used for automated decision-making or profiling individuals.

Your rights

17 You have various rights in relation to your information, including:

- The right to access the information we hold;
- The right to request rectification or erasure of the information that we hold;
- The right to request that we restrict what we are doing with your information;
- The right to object to what we are doing; and
- The right to data portability (only where the lawful basis is consent or contract, and the processing is carried out by automated means);

18 Please note that some of these rights may not apply in all circumstances, and we may need to confirm your identity before responding to a request.

19 Where we have relied upon your consent to process your information, you also have the right to withdraw your consent at any time.

20 If you would like to exercise any of these rights, or have any other questions about this Notice, please contact the University's Information Compliance Team at data-protection@bathspa.ac.uk.

21 You also have the right to make a complaint to the Information Commissioner's Office about how we use your information, although we would ask that you get in touch with us first in order that we can try to put things right. How to contact the Information Commissioner's Office can be found at <https://ico.org.uk/concerns/>.