

University of Plymouth International College

Privacy Notice

Document Name	Student Retention Privacy Notice
Brief Description	Explains how PIC will collect and use personal data pertaining to attendance by students, academic concerns and safeguarding.
Responsibility	Matias Shortcook
Initial Issue Date	TBC

Date	Version Number	Summary of Changes	Reviewer name & department
23/04/2026	0.1	Draft amendments	M. Shortcook – UPIC
24/04/2026	0.2	Additions to draft	K. Marshman - Privacy
29/04/2026	1	Final	K. Marshman - Privacy

1. Introduction

Navitas respects your right to privacy. This privacy notice explains who we are, how we collect, share, and use personal information about you, and how you can exercise your privacy rights.

Navitas reserves the right to make changes periodically to this Privacy Notice at our discretion, when needed. Any changes will be communicated to you, so you are kept up to date with the information you are entitled to.

2. Navitas

Navitas is a global education provider (ABN 69 109 613 309). Our head office is in Perth, Western Australia at the following address:

Navitas Pty Ltd Level 8 Brookfield Place
125 St Georges Terrace PERTH WA 6000 Australia

The Company has subsidiary companies and affiliated organisations operating in Australia, New Zealand, Canada, UK, Europe, Africa, Southeast Asia, North Asia, South America, the Middle East, and the USA, collectively called the “Company”.

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The European head office is in the UK at the following address:

Navitas UK Holdings Limited
The Lambourn
Wyndyke Furlong
Abingdon
Oxfordshire
OX14 1UJ

You can contact Navitas for any privacy related questions or concerns, from any country in the world by emailing the Privacy Team at privacy@navitas.com

3. The personal data we are using about you

We create information about you during the course of your studies with us. For the purposes of this privacy notice, we are particularly referencing personal data we create about you regarding your attendance, academic progress, and, if relevant, pastoral safeguarding information.

4. How we will use personal data

We will use this data to monitor your progress. Where attendance or academic performance is not in line with the college requirements support will be provided, informed by this data to help facilitate your progress.

In line with the Safeguarding policy (and relevant annual training) where emerging indicators in this data may suggest a safeguarding concern we will act on this data to pre-empt or respond to safeguarding concerns.

5. The lawful basis for collecting and processing your personal data

Lawful basis for processing of attendance and academic concerns – Legitimate Interests

Lawful basis for processing of safeguarding – Legal Obligation (see below)

[Education Act 2002](#), specifically Section 175, which requires local authorities and school governing bodies to ensure their functions are carried out to safeguard and promote the welfare of children.

[Keeping Children Safe in Education \(KCSIE\)](#): Statutory guidance from the Department for Education (updated regularly, e.g., Sept 2023/2024), which schools and colleges in England must follow.

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Children Act 1989 & 2004: Sets the overall legal duty for protecting children from harm and promoting their welfare.

Education and Training (Welfare of Children) Act 2021: Extends safeguarding duties to wider education providers, including independent training providers.

The Education (Independent School Standards) Regulations 2014: Covers safeguarding requirements for private educational settings

6. How long do we keep your Personal Data?

Information regarding your attendance, academic progress or pastoral information including concerns, or safeguarding will be kept for 7 years once you finish our pathway course. This is to meet the UK Visas and Immigration requirements.

7. Sharing your Personal Data

The primary relationship is with the student in all discussions however the college will share data, if deemed to be in the best interests of the student and without prior consent in the following circumstances.

Attendance

As part of ensuring your successful progress, the college will contact you if your attendance does not meet the expectations of our attendance policy or the UK Visas and Immigration services (where relevant).

In line with those expectations if there is persistent or significant attendance concerns the college will contact your parent, guardian, agent, or sponsorship body to provide additional support in the interests of supporting your progress.

Academic concerns

Similarly, the college will always contact a student where there is an academic concern. Where there is a significant academic concern that presents a possible or definitive risk to a student's successful progress the college will contact a parent, guardian, agent or sponsorship body in the interests of identifying strategies for successful progression or supporting the student in the exiting from a programme.

Attendance and academic concerns regarding your progress will be shared with the associated academic and pastoral teams for your chosen destination programme where your current or future academic progress (at the University or college) requires further support or is at risk.

Right to Object to attendance and academic concerns (does not apply to safeguarding)

If you do not wish us to contact your parent, guardian or agent in the context of attendance or academic concern please let us know by contacting us at privacy@navitas.com to let us know. You have the right to object under the UK GDPR, and any requests will be reviewed accordingly.

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Safeguarding and Prevent Duty

The college, referring to its safeguarding and prevent duty policies, will share your personal data in the event it believes there is a possible or confirmed safeguarding or Prevent concern. This is required by law, and depending on the situation, the following are examples of who we would contact.

This is a legal obligation, and the laws around safeguarding students are listed in section 5, above.

- Parents/legal guardians
- UK Guardians
- Agents
- Medical services
- Emergency services (police, ambulance etc)
- Relevant Government Agencies

8. International Transfers of your Personal Data

International transfers will take place within Navitas, and internal sharing is covered by our Intra Group Data Sharing Agreement which ensure your personal data is safe and meets legal requirements.

If we need to share it with parents, guardians or agents, and they are situated outside of the UK, then the personal data will be shared securely and safely.

9. Your rights over your Personal Data explained

The rights you have may be different depending on where you live in the world, or where in the world Navitas is using your personal data. If your country is not listed below, please contact: **privacy@navitas.com** for further information.

If you live in the UK or the EU (including Liechtenstein, Norway, and Iceland) your rights are listed below. Depending on what lawful basis is being used to collect and process your personal data, some of the data subjects rights may not be engaged. We have greyed out those which do not apply to you for the purposes of this privacy notice.

- Right of access – Request a copy of the personal data Navitas holds on you.
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to Portability
- Right to object and automated individual decision-making
- Right to object

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For any questions, queries, or to make a request, no matter where in the world you are located, please email privacy@navitas.com

10. Questions or Issues you may have

If you are contacting us to complain about an alleged breach of this Privacy Notice, or you have a question, please provide us with as much detail as possible so that we can deal with your concern quickly and effectively.

We will take every privacy complaint seriously and assess it with the aim of resolving the issue swiftly.

11. Our Contact Details

If you wish to contact the DPO for Navitas, and raise any queries or concerns, they can be contacted via privacy@navitas.com

12. Contacting your Supervisory Authority

If you need to make a complaint about how Navitas collects and uses your personal data, we kindly ask that you contact us in the first instance on privacy@navitas.com. The Regulators, no matter what country they reside in, would prefer that Navitas tries to resolve any issues with you first before you contact them.

However, the Regulators are there for your concerns, and if you feel Navitas has not handled your complaint appropriately, we encourage you to contact them. Navitas is committed to open and transparent processing of your personal data and welcome the Regulators view.

You may contact the Regulator in whichever country you live and details of them can be found via a quick Google search, if you are not already aware of them. Alternatively, please reach out to our privacy team for advice, they will be happy to assist you.

UK

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: casework@ico.org
Telephone: 0303 123 1113
Website - www.ico.org.uk

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