

STUDENT PRIVACY NOTICE

1. What is the purpose of this document?

The Malta College of Arts, Science and Technology of Corradino Hill, Paola (the “College”; “we”; “us” or “our”) is wholly committed to protecting the privacy and security of the personal information of its students

This privacy notice (the “Notice”) describes how we collect and use information about you during and after your enrolment as a student with us, in accordance with the Data Protection Act (Chapter 440 of the Laws of Malta), as may be amended from time to time, and the General Data Protection Regulation (*EU* 2016/679).

This Notice applies to all students of the College, full-time, part-time and alumni.

- 1.1 The College is a “**data controller**”. This means that we are responsible for deciding how we hold and use personal information (i.e. “**personal data**”) about you. We are required under applicable data protection legislation to notify you of the information contained in this Notice.
- 1.2 The College requires a certain amount of personal data about you (**the student**) in order to administer your studies, organise and provide your education and to comply with its statutory obligations. During the exercise of our administrative and educational functions, we (the College) will process your personal data as a data controller (which may be held on paper, electronically, or other medium) and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act (Chapter 440 of the Laws of Malta), as may be amended from time to time, and the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**” or the “**Regulation**”).
- 1.3 The purpose of this Notice is to set out the basis on which we will process your personal data, to inform you about how we will handle and look after your personal data and to tell you about (i) our obligations in regard to processing your personal data responsibly, (ii) your data protection rights as a data subject and (iii) how the law protects you.
- 1.4 This Notice applies to current and former students (full-time, part-time and alumni). This Notice does not form part of your student agreement. **We may update or amend this Notice at any time.**
- 1.5 It is important that you read this Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using your personal data.
- 1.6 For identity purposes, the data controller is The Malta College of Arts, Science and Technology (**MCAST**) of Corradino Hill, Paola.

2. Definition of terms

- 2.1 “**Consent Form**” refers to separate documents which we might from time to time provide you where we ask for your explicit consent for any processing which is not for purposes set out in this Notice.

- 2.2 “**Data subjects**” for the purposes of this Notice means living individuals about whom we collect and hold personal data.
- 2.3 “**Data controller**” means any entity or individual who determines the purposes for which, and the manner in which, any personal data is processed.
- 2.4 “**Data processor**” means any entity or individual that processes data on our behalf and on our instructions (we being the data controller).
- 2.5 “**EEA**” means European Economic Area.
- 2.6 “**Personal data**” means data relating to a living individual who can be identified from the data (information) we hold or possess. This includes, but is not limited to, your name and surname (including maiden name where applicable), address, date of birth, nationality, gender, civil status, tax status, identity card number & passport number, contact details (including mobile and home phone number and personal email address), photographic image, bank account details, emergency contact information as well as online identifiers. The term “**personal information**”, where and when used in this Notice, shall be taken have the same meaning as personal data.
- 2.7 “**Processing**” means any activity that involves use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
- 2.8 “**Sensitive personal data**”, “**sensitive data**” or “**special categories of personal data**” includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. This type of sensitive data can only be processed under strict conditions.

3. **Data protection principles**

We will use all efforts to ensure and maintain compliance with applicable data protection laws and principles. This means that the personal data we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

4. The kind of information we process about you

As set out above, personal data (or personal information) means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or can no longer lead to identification (pseudonymised data). It also does not include information relating to a legal person (for example, a company or other entity). There are special categories of more sensitive personal data which require a higher level of protection.

4.1 We collect and maintain different types of personal information about our students, including the personal information that was provided and obtained during the application and registration process.

We will generally collect, store, and use the following categories of personal data:

- Personal details such as your first name, surname, title and identity document number;
- Personal contact details such as your home address (including post code), telephone number, mobile number and personal email address;
- Date of Birth;
- Gender;
- Nationality;
- Title;
- Status of application (normal eligible application, mature or provisional);
- Next of kin and emergency contact information;
- National insurance number (or other tax identification number);
- Country of domicile and nationality;
- Photographic image;
- Student allowances;
- Bank account details;
- Education history;
- Academic transcripts;
- Qualifications;
- Unique student number (allocated by the College);
- MCAST email account;

- MCAST student record, including your courses, modules, student assessments, assignments, work produced, examinations taken, examination results and grades, repeated units; progression reports, class ranking, degrees conferred and other information that may be included in your record;
- Family or personal circumstances (where applicable);
- Academic and extracurricular interests;
- Feedback (including course resignation letters);
- Disciplinary information (reports and hearings);
- CCTV footage;
- Other information obtained through electronic means such as swipe and access card records; and
- Information about your use of our information and communications systems.

4.2 When you apply and register as a student, you can decide if you wish to share with the College certain types of **sensitive personal data** or **special categories of personal data** about yourself.

This may include information relating to your:

- health and medical conditions (for example, disability status, medical report);
- specific conditions and needs (for example, learning difficulties);
- past criminal convictions and offences;
- racial or ethnic origin; religion or similar beliefs; and sexual orientation.

The application and registration process will provide you with more information.

We will strictly process this information in accordance with Clause 10 below.

5. How is your personal information collected?

5.1 We may collect personal data about you in a number of ways, including:

- from the information you provide to us when you interact with us before joining, for example when you express an interest in studying at the College;
- when you apply to study at the College and complete our enrolment forms and other admissions processes and procedures;
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns; and
- in various other ways as you interact with us during your time as a student at the College.

5.2 We may also collect personal information about you from third parties, for example from your previous or current school, Sixth Form College, university or employers who may provide a reference about you.

5.3 When we obtain personal data about you from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data.

6. How we will use information about you

We will only use your personal data when the law allows us to.

Most commonly, we will use your personal data in the following circumstances:

1. Upon your consent (**Article 6(1)(a), GDPR**).

On specific occasions the College will only process certain data if you provide us with express consent.

2. Where it is necessary for the performance of your student agreement (**Article 6(1)(b), GDPR**).

The College will regularly need to process your personal data in order to enable to meet its contractual commitments to you (the student), e.g. delivery of courses, teaching and assessment, conferral of degree.

3. Where we need to comply with a legal obligation (**Article 6(1)(c), GDPR**).

The College does have legal obligations to retain and disclose your personal information to others.

4. To protect your vital interests (or someone else's interests) (**Article 6(1)(d), GDPR**).

Sometimes in extreme circumstances the College will have to release information to protect your interests or the interests of others e.g. in medical emergencies.

5. Where it is needed in the public interest or for official purposes (**Article 6(1)(e), GDPR**).

The College is an educational establishment and in particular its educational activity is conducted in a public interest (including your interest and the interest of others).

6. Where the processing is necessary for the purposes of the legitimate interest of the College or a third party, provided these do not override the interests of the data subject (**Article 6(1)(f), GDPR**).

The College has a broad legitimate interest that connects to the activities and education of students.

7. To establish, exercise or defend legal claims (including **Article 17(3), GDPR**).

7. Situations in which we will use your personal data

7.1 We need to process the categories of personal information set out above in **Clause 0.1** primarily for the following specific purposes.

(i) To perform your student agreement or due to legitimate interests

- Admission, registration and administration of your studies;
- Academic assessment and progression;
- Administration of student related policies and procedures, including appeals, complaints, grievances, disciplinary matters and conduct, cheating and plagiarism;
- Academic matters, including the provision of our core teaching, learning and research services (for example, registration, assessment, attendance, managing progress, academic misconduct investigations, certification, graduation);
- Billing (where applicable);

- Maintaining student records;
- Pursuit of social and sporting activities;
- Providing library, IT and information services;
- Provision of student support services;
- Organising teaching and examinations;
- Collect tuition or other course (or module) fees (where applicable);
- Administer finance (e.g. fees and bursaries) (where applicable);
- Administration of student computing services;
- Conferral and publication of awards and degrees;
- Research and statistical analysis;
- Creation and provision of student email address;
- Correspondence regarding lectures, tutorials and seminars;
- Direct mailing about (i) College activities and events organised for students, (ii) student benefits and opportunities offered by or through the College, (iii) career opportunities;
- To ensure the security of individuals and their property and the protection of College assets (namely, via CCTV footage);
- Produce student identification cards, and the inclusion of photographic images on the College's computerised student record system;
- Provide careers and other student support services;
- Provide apprenticeship opportunities and placements with third party organisations and businesses;
- Provide you with educational services which may not be set out in our student agreement but which are nevertheless a part of our academic and educational mission;
- Monitor and evaluate the performance and effectiveness of the College, including by training our staff or monitoring their performance;
- Maintain and improve the academic, corporate, financial, estate and human resource management of the College;
- Enable effective communications with you;
- To gather evidence for possible grievance or disciplinary hearings;
- To deal with grievances and disciplinary action;

- To manage internal disputes between you and other students or College employees;
- To ensure network and information security, including preventing unauthorised access to our computer and communications systems and preventing malicious software distribution;
- To promote our services (e.g. providing information about summer schools, student exchanges, or other events happening on and off campus); and
- To pursue or exercise any other legitimate interests that we may have at law.

(ii) To comply with a legal obligation

- To produce statistics and research for statutory reporting purposes;
- To safeguard and promote the welfare of students;
- To ensure students' safety and security;
- To carry out audits (e.g. to ensure compliance with our regulatory and legal obligations);
- To prevent and detect crime;
- To assist with investigations (including criminal investigations) carried out by the police and other competent authorities; and
- To comply with our other legal and regulatory obligations, as may be imposed on us from time to time, such as compliance with anti-money laundering laws and safeguarding requirements.

(iii) To establish, exercise or defend legal claims

- To deal with legal disputes which relate to or otherwise involve you, including accidents at our grounds and premises.
- For complaints and appeals procedures.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information (the categorisation in this **Clause 7** is mainly indicative). These grounds may be updated from time to time.

8. If you fail to provide personal information

8.1 If you fail to provide certain personal information when requested, we may not be able to give effect to your student agreement, or we may be prevented from complying with our legal obligations (such as to safeguard the welfare of our students).

9. Change of purpose

9.1 We will only use your personal data for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and where that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

9.2 Please note that we may process your personal data without the need to obtain your consent, in compliance with the above rules, where this is required or permitted by law.

10. How we use sensitive personal data

10.1 We may collect and process special personal data about you in the following circumstances:

- Where we have your explicit consent to do so (**Article 9(2)(a), GDPR**). For instance,
 - on registration and enrolment, you only need to provide certain special categories of personal data about yourself if you agree and choose to do so (e.g. ethnic origin);
 - when you apply to register with our Inclusive Education Unit (**IEU**)/ Student Support Services to obtain the additional or particular student support that caters for your specific needs (as indicated by you);
 - when you submit any documents or certificates to support your application for IEU Registration.
 - when you schedule and attend an appointment with one of our IEU Coordinators/ Student Support Services Staff to discuss and explain further your application for IEU Registration.

We request your explicit consent to collect and process the sensitive personal data about yourself that you may provide us in such circumstances. We will strictly process that information for the specific purposes indicated in the relevant form or application (for example, in the case of an IEU application, the information and documents provided will be used to verify and determine the student's indicated needs and the type of additional or particular support that would be appropriate for that student).

- Where it is necessary for medical purposes, for example medical diagnosis, provision of health or social care or treatment, or a contract with a health professional (**Article 9(2)(h), GDPR**).
- Where it is needed to protect your vital interests (or someone else's interests) and you are not capable of giving your consent (**Article 9(2)(c), GDPR**).
- Where it is needed in relation to legal claims (**Article 9(2)(f), GDPR**). For example, disclosure to our external lawyers and insurers in respect of accidents occurring within the College grounds and premises (each of whom are bound by professional secrecy).
- Where you have already made the information public (**Article 9(2)(e), GDPR**).

10.2 Access to, and the sharing of, your sensitive personal data will be controlled very carefully at all times and maintained under the strictest confidence. You will be given more details about our use of any sensitive personal data when we collect it from you.

10.3 Your **explicit consent** is hereby requested for the College to process your **sensitive personal data** and to release or share that sensitive personal data with the following third parties:

- To the National Statistics Office, government departments and other authorised users for the analysis of student statistics and/or to enable them to carry out their statutory functions (as authorised by their specific legislation) as applicable;

- To professional bodies where registration with that body is related to or a requirement of the student's studies;
- To other bodies involved in the delivery of the course or programme, e.g. affiliated colleges, for the purpose of statistical analysis and programme administration;
- For the provision of the necessary student and educational support to disabled students and/or students with special conditions or needs;
- For admission to and the administration of student programmes, and attendance monitoring;
- Where required, to the police or other agencies in connection with particular programmes of study or prior to certain placements.

10.4 Sensitive personal data relating to your health, conditions, needs or a disability will not be shared without your consent, unless required by law or in your vital interests in an emergency situation. Such information may however need to be shared with certain staff at the College in order to provide you with the best support, or your requested support (in line with any IEU application that you may submit), for your studies (**disclosure and sharing amongst College staff will always be on a strictly necessary basis**).

11. Data Sharing

11.1 Occasionally, to achieve the processing purposes set out in this Notice (see **Clause 7.1**), we may need to share your personal data with certain third parties. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Indicative instances are as follows:

(i) To comply with a legal obligation

- To law enforcement authorities and/or regulatory bodies where pursuant to the investigation or disclosure of a potential crime;
- To national government departments and agencies where we have a statutory obligation to provide information (for example, the National Statistics Office, gathering of census information);
- To the National Statistics Office (**NSO**), government departments and other authorised users for the completion of student surveys and for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable;
- To the Chief Immigration Officer in connection with international students (Maltese visas and immigration). The shared information would, in particular, include attendance records.

(ii) To perform your student agreement or due to legitimate interests

- To professional and industrial bodies wishing to communicate with students about career opportunities and membership of their body;
- To external examiners for the purpose of assessment;
- To (prospective) employers and other educational institutions for the verification of your awards, qualifications and academic transcripts;

- To other education institutions involving in the delivery of the student’s course or programme, for example affiliated colleges, exchange institutions;
- To professional bodies where registration with that body is related to or a requirement of the student’s studies;
- In relation to the provision of references for students or former students;
- To external bodies and individuals who have funded student prizes and awards;
- To third parties who work with us to provide student support services (e.g. counselling);
- To banks (and other payment agencies you may use), family, sponsors or other third parties to enable them to pay student debts;
- To external agents of the College in relation to the repayment of student debts;
- To third parties who are contracted to provide out-of-hours IT services for us;
- To organisations operating anti-plagiarism software on our behalf;
- To professional and regulatory bodies (NCFHE) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses;
- To parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure); and
- To any organisation (data processor) acting under the authority of the College to process personal data which it holds for the purposes set out in **Clause 7** above.

(iii) To protect your vital interests

- To close family and the emergency services where there is an emergency situation, e.g. illness, serious injury or bereavement.

11.2 Should your programme of study be delivered wholly or in part by another institution, this may involve some of your personal data being transferred to that external educational provider.

11.3 If you undertake a placement, traineeship or apprenticeship, or complete a period of study with a third party organisation or institution (e.g. an exchange visit), your personal data may be shared with the partner organisation or receiving institution **for the purposes** of administering the placement, traineeship, apprenticeship and/or your studies at the receiving institution (as applicable), monitoring your attendance and any other valid reason that may emanate from the relevant agreement which you enter into.

11.4 If you have entered Malta on a student visa and have a period of unauthorised absence, fail to enrol, interrupt, withdraw, are excluded from studies at the College, or make any change to your programme title, content or duration, the College may be obliged to pass this information to the Chief Immigration Officer. We may monitor attendance to collect data for this purpose.

12. Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request. Third parties will only process your personal data on our instructions and where they have contractually agreed to treat the information confidentially and to keep it secure (**duty of confidentiality**).

- 12.1 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.
- 12.2 We have also 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.
- 12.3 Details of these measures may be obtained from our data protection officer.

13. Transferring of personal data to a country outside the EEA

- 13.1 We may transfer any personal data we hold to a country outside the EEA for any of the purposes set out in this Notice, provided that:
 - (a) the country to which the personal data is transferred ensures an adequate level of protection for the data subject's rights and freedoms recognised under EU data protection law (**adequacy decision**);
 - (b) in the absence of an adequacy decision, the data transfer is regulated by specific contracts approved by the European Commission which give personal data the same protection it has in Europe;
 - (c) the transfer is necessary for the performance of your employment contract with the Company;
 - (d) the transfer is necessary for the performance of a contract concluded in your interests between us and another person;
 - (e) the transfer is necessary for important reasons of public interest;
 - (f) the transfer is necessary in order for us to comply with a legal or regulatory obligation; or
 - (g) the transfer is necessary for the filing, or defence, of legal claims.

- 13.2 For all other cases, we will request your explicit consent to transfer your data to outside the EEA.

14. Data retention

How long will you use my information for?

- 14.1 We will only retain your personal data for as long as necessary to fulfil the purposes for which we had collected it. This means that personal data will be destroyed or erased from our systems when it is no longer required. Details of retention periods for different aspects of your personal data are set out in our retention policy which is available from our data protection officer.
- 14.2 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 your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

14.3 In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you. Once you are no longer a student of the College, we will retain and securely destroy your personal data in accordance with our data retention policy. **Note that (as an educational institution) we have a legal obligation to maintain certain items of personal information in perpetuity about our students such as (i) programme and module specifications, (ii) academic transcripts and (iii) basic verification information.**

15. Rights of access, correction, erasure, and restriction

15.1 The data protection laws across the EU, including Malta, will change on 25th May, 2018, due to the application of the GDPR. Although this Notice sets out most of your rights under the GDPR, we may not yet be able to respond to some of your requests until May, 2018, as we are still working towards getting our systems ready for some of these changes.

Your duty to inform us of changes

15.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

Right of Access

15.3 You have the right to request information as to whether or not your personal data is being processed by us, as well as information as to how and why it is being processed.

15.4 You may send an email to dpo@mcast.edu.mt requesting information and a copy of the personal data about you which we process. You shall receive one copy, free of charge and via email, of your personal data which is undergoing processing by us. A limit of two such requests per 12 months is being made for logistical reasons.

15.5 This right to access your personal data is without prejudice to the integrity and confidentiality of the personal data of other persons, and only your personal data may be divulged to you.

Right to Correction

15.6 You have the right to **request correction or rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected and/or updated, though we may need to verify the accuracy of the new data you provide to us.

Right to Erasure

15.7 You have the right to **request erasure** of your personal data. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.

15.8 You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

15.9 Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Most commonly, this will be where further processing of the personal data is required by us:

- to comply with a legal obligation to which we are subject;

- to assert, exercise or defence of legal claims (including possible future claims);
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Right to Object

15.10 You have the right to **object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.

Right to Restriction

15.11 You have the right to **request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Right to Request Transfer (Data Portability)

15.12 You have the right to **request us to transfer (data portability)** your personal data to yourself or to a third party which you designate. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.

Exercise of Rights

15.13 If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our data protection officer in writing.

What we may need from you

15.14 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information in question (or to exercise any of your other rights). This is another appropriate security measure that we apply in order to ensure that personal data is not disclosed to any person who has no right to receive it.

Right to withdraw consent

15.1 Where you may have provided your consent to the collection, processing and transfer of your personal data 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 our data protection officer at dpo@mcast.edu.mt. This also applies in respect of your sensitive personal data where our processing activities are based on your consent.

15.2 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 have another legitimate basis for doing so in law**. Your withdrawal will not affect the lawfulness of any processing which we carried out before you withdrew your consent.

16. After you graduate

16.1 Following your graduation, your personal data will be used by our Alumni Office to keep you in touch with the College and our Alumni Network. A snapshot of your data may also be used for training purposes. You can opt-out of this by exercising your **right to object** (see above).

17. Data protection contact point and complaints

17.1 We have appointed a data protection officer (DPO) to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal information, please contact the DPO on dpo@mcast.edu.mt. You have the right to lodge a complaint at any time to the competent supervisory authority in your jurisdiction on data protection matters.

17.2 In the case of Malta, this is the Information and Data Protection Commissioner (“**IDPC**”) (<https://idpc.org.mt/en/Pages/Home.aspx>). We would, however, appreciate the opportunity to deal with your concerns internally before you approach the supervisory authority, so please bring the matter to our attention at the first instance.

18. Changes to this privacy notice

18.1 We reserve the right to update this Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this Notice, please contact our data protection officer at dpo@mcast.edu.mt.

Pursuant to Clause 10.3, your explicit consent is requested to process your sensitive data for the below purposes:

- To the National Statistics Office, government departments and other authorised users for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable.
- To other bodies involved in the delivery of the course or programme, e.g. affiliated colleges, for the purpose of statistical analysis and programme administration.
- For the assessment and provision of services to disabled students;
- For admission to and the administration of student programmes, and attendance monitoring;
- Where required, to the police or other agencies in connection with particular programmes of study or prior to certain placements.

For applicants/students below the age of 16 (minors), consent must be given or authorised by the holder of parental responsibility over that applicant/student.