POLICY

TITLE: 16-19 Bursary Funds including Vulnerable Bursary Policy 2024-25

POLICY HOLDER: Alexandra Miller

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Accessibility: If you would like this information in an alternative format, e.g. Easy to Read, large print, Braille or audio tape, or if you would like the procedure explained to you in your language, please contact the College's marketing team on 01603 773 169.

Further information: If you have any queries about this policy or procedure, please contact the named policy holder.







^{*}The review period refers to our internal policy review process. The published policy is current and is the most recent approved version.

LEGISLATION OR 16 to 19 Bursary Fund guide **REGULATION:** 2024 to 2025 GOV.UK Published 8th May 2024 Free meals in further education funded institutions guide: 2024 to 2025 Residential Bursary Fund: guide for the 2024 to 2025 academic year Published 27th March 2024 Residential Bursary Fund: guide for the 2024 to 2025 academic year Published 27th March 2024 Apprenticeship care leavers' bursary guidance Published 8th February 2023 VERSION CONTROL DOCUMENT **VERSION REASON FOR CHANGE** AUTHOR DATE NO. June 2024 New policy Alexandra Miller







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Introduction

What is the 16-19 bursary Fund?

The 16 to 19 Bursary Fund provides financial support to help students overcome the specific financial barriers to accessing college so they can remain in education.

There are 2 types of 16 to 19 bursaries:

- bursaries for defined vulnerable groups¹
- discretionary bursaries which the college makes decisions about, in line with the funding rules²

In addition, there are other sources of financial support that young people can access at college:

- 16-19 Residential Bursary Fund (for 16- to 18-year-olds who are studying on full time land-based courses, or sports excellence rugby and golf, and helps towards the cost of your on-site accommodation.)
- Free College Meals Fund (for students with a family household claiming any of the benefits, listed in section 3. Free College Meals (FCM))
- Care Leaver Apprentice Bursary (for students under the age of 25 when they start an apprenticeship)

The funds cannot be transferred between categories and each fund has different eligibility criteria as set out by central Government. Therefore, funds may have different household income thresholds, payment limits and conditions.

To be eligible for these funds, students must be enrolled at Easton, Paston or City College Norwich on a publicly funded course, have settled status/ordinarily resident in the UK for 3 years and be aged over 16 and under 19 as of the 31st of August before they enrol, to be eligible for this bursary in the next academic year. Please see the 16-19 Bursary Fund guidance for further details.

For example, to be eligible for the Bursary on 1st September 2024 for the whole of the academic year, you must be aged under 19 on 31st August 2024.

Students aged 19 or over are only eligible to receive a discretionary bursary if they are continuing on a study programme they began aged 16 to 18 (19+ continuers) or have an Education, Health and Care Plan (EHCP).

Students on apprenticeship programmes or on waged training are not eligible for help from the 16-19 Bursary Fund as they are employed rather than in education. Care Leaver Apprentices can claim support via the Care Leaver Apprentice Bursary as detailed below in section 5.

- in care
- care leavers
- receiving Income Support (IS), or Universal Credit (UC) because they are financially supporting themselves or financially supporting themselves and someone who is dependent on them and living with them, such as a child or partner
- receiving Disability Living Allowance (DLA) or Personal Independence Payments (PIP) in their own right as well as Employment and Support Allowance (ESA) or UC in their own right

¹ The defined vulnerable groups are students who are:

² See <u>16 to 19 Bursary Fund guide 2024 to 2025 academic year - GOV.UK (www.gov.uk),</u> Published 8th May 2024

This policy states the eligibility criteria and process for the administration of the funds. The rules within this policy are subject to change at any time from the ESFA.

By applying for any Government funded bursary, students understand that they will be required, and agree, to pay back any funds received if they withdraw from the college within the first 6 weeks of the course.

1. 16-19 Bursary

1.1 Eligibility

Financial eligibility is primarily based on the level of household income (including all benefits) as follows:

- Net income up to £40,000 pa (£50,762 gross)
- For families with multiple siblings, the threshold will be increased by £1000 per additional child, up to a maximum of net income £48,000 pa. (evidence required)

For the purposes of this policy, household income includes:

- Income from employment/self-employment
- Job seekers allowance
- Employment & support allowance
- Universal credit
- Pension (both old age and private)
- Working tax credits

For the purposes of this policy, benefits **excluded** from household income are:

- Housing benefit
- Child benefit
- Disability Living Allowance (DLA) or Personal independence payments (PIP)

1.2 Awards

The bursary can be used for essential items the student would otherwise need to pay for to participate in the course. It can help with costs such as travel, food whilst at college, childcare whilst at college or timetabled placements, essential books and equipment, essential trips and university interviews/open events (restrictions apply). The bursary awards also support students on work experience or industry placements who have extra participation costs such as travel & suitable clothing.

The bursary cannot be used to support students with any extra-curricular activities or for learning support such as mentoring, tutoring or counselling and cannot be used to support the families' cost of living.

All awards are based on individual circumstances and actual financial need.

In the academic year 24-25, the bursary awards will support students as follows:

Type of Support	Books, Equipment, Uniform	Travel (for all students living more than 1 mile from college	Childcare (on timetabled days)	Meal credit	Essential trips	University open day trips & Interviews
Amount	Actual course costs as per listed on the website, supplied by academic staff, or held within the Advice Shop.	of travel per student (exceptional circumstances considered)	Award offered once all other forms of financial support have been accessed e.g. care to learn. Support only offered for when students have timetabled classes or placement. Case by case basis.	day at college.	Up to a maximum of £300 per student. Funds dependent.	Awarded on a case-by-case basis and recognising that Norfolk is a rural County. Up to a maximum of £300 per student. Funds dependent.

1.3 Payments

Payments for books, equipment and uniform will be paid in the first pay run of the academic year. In the year 2024-25 this will be the last Friday in September. Where possible, students should purchase their necessary equipment ready for the start of term. Curriculum areas will have some equipment available to borrow/use in class until individual purchases can be made. The bursary team cannot pay the equipment suppliers directly. Receipts will be required as proof that the bursary money has been used as intended for the purchase of equipment/uniform/books. Receipts will also be required before any reimbursement can be made.

Payments for travel will be awarded in equal monthly instalments on the last Friday of each month starting in September. Students who have requested a First or Konect bus pass on their application form will need to contact the bursary team at bursaryadmin@ccn.ac.uk or on 01603 773063.

Payments for food allowance will be uploaded onto student's ID Cards the day after their bursary application has been processed and approved. Student's will receive email notification of this.

Where applicable, payments for childcare will only apply for days when the student has timetabled classes or placement/work experience. Students should ensure they have accessed Care to Learn financial support first before applying to the bursary. Childcare costs will be reimbursed once the childcare has taken place. Students will need to pay for their childcare initially. If students pay for childcare after the childcare has taken place, they will be reimbursed in the following week's pay run providing all invoices and proof of payment have been provided.

Payments will be made by BACS into a bank account which should be in the student's own name. Students without bank accounts at the time of application should make effort to open a bank account prior to the first payment being made. Payments into caregivers' bank accounts should be limited to students who would be unable to administer their own account or in exceptional circumstances. CCN cannot accept responsibility if incorrect bank details are provided or if payments made do not reach

the nominated account.

1.4 Attendance

Student attendance is monitored and should be a minimum of 90%. All absences must be authorised and notified to the college through the absence line immediately. Awards will be made as follows based on the following attendance levels unless confirmation is received from academic staff for extenuating circumstances. Attendance monitoring does not apply to students who have justified absences or have been suspended without prejudice.

Attendance thresholds (based on the month	Payment
prior to payment)	
90-100%	100%
75-89%	75%
50-74%	50%
0-49%	0%

1.5 How to apply

The college uses an online bursary administration system called Pay My Student. The link can be found on the College website or by clicking on this link <u>City College Norwich (paymystudent.com)</u>. Students will need access to the email address they used on the application form for their college course, details of their household income and their bank account details to hand. If students require any help completing the application, then they can contact the bursary admin team at <u>bursaryadmin@ccn.ac.uk</u> or on 01603 773063.

1.6 Application timeline

Applications open in July 2024 prior to enrolment. Students will need to have an active college course application before they can apply for the bursary. We will only issue an award once applicants have been enrolled. If students have not made an application prior to enrolment, they must apply as soon as they can once they have enrolled. Funds are limited and are dealt with on a first come, first served basis.

We reserve the right to suspend or close the bursaries at certain times throughout the year, as necessary. However, we will consider applications to all forms of financial support throughout the academic year if emergencies arise.

All applicants must provide evidence of household income which can then be documented as required by the ESFA. Applications cannot be assessed and/or bursaries awarded without evidence.

2. 16-19 Vulnerable Bursary Fund

2.1 Eligibility

To be eligible for the 16-19 Vulnerable Bursary, students must be in a defined vulnerable group. These groups consist of students most unlikely to receive financial assistance from parents or carers and therefore more likely to have a financial need to access college provision.

The defined vulnerable groups are students who are:

- in care
- care leavers

- receiving Income Support (IS), or Universal Credit (UC) because they are financially supporting themselves or financially supporting themselves and someone who is dependent on them and living with them, such as a child or partner
- receiving Disability Living Allowance (DLA) or Personal Independence Payments (PIP) in their own right as well as Employment and Support Allowance (ESA) or UC in their own right.

For definitions of children 'in care' and 'Care Leavers', please see 16-19 Bursary Guidance³ (section 4.1)

Students will be required to provide proof of status by means of a section 20 letter/letter from their social worker. This evidence will be required before any awards can be made.

2.2 Awards

Eligible students can receive up to £1200 during each academic year for a course of 30+ weeks duration. Awards must be based on the actual financial need to participate on the course. Students on courses of less than 30 weeks or studying less than 15 hours per week will be awarded a pro-rata rate. Students who are having their financial needs met, or who have no relevant costs, may have their application refused if they do not meet the financial need criteria.

In exceptional circumstances, students may receive more than £1200 where a clear financial need is assessed. Any additional funds will be awarded from the 16-19 Discretionary Bursary.

2.3 Payments

Payments for books, equipment and uniform will be paid in the first pay run of the academic year. In the year 2024-25 this will be the last Friday in September. Where possible, students should purchase their necessary equipment ready for the start of term. Curriculum areas will have some equipment available to borrow/use in class until individual purchases can be made. The bursary team cannot pay the equipment suppliers directly. Receipts will be required as proof that the bursary money has been used as intended for the purchase of equipment/uniform/books. Receipts will also be required before any reimbursement can be made.

Payments for travel will be awarded in equal monthly instalments on the last Friday of each month starting in September. Students who have requested a First or Konect bus pass on their application form will need to contact the bursary team at bursaryadmin@ccn.ac.uk or on 01603 773063.

Payments for food allowance will be uploaded onto student's ID Cards the day after their bursary application has been processed and approved. Student's will receive email notification of this.

Where applicable, payments for childcare will only apply for days when the student has timetabled classes or placement/work experience. Students should ensure they have accessed Care to Learn financial support first before applying to the bursary. Childcare costs will be reimbursed once the childcare has taken place. Students will need to pay for their childcare initially. If students pay for childcare after the childcare has taken place, they will be reimbursed in the following week's pay run providing all invoices and proof of payment have been provided.

Payments will be made by BACS into a bank account which should be in the student's own name. Students without bank accounts at the time of application should make effort to open a bank account

^{3 16} to 19 Bursary Fund guide 2024 to 2025 academic year - GOV.UK (www.gov.uk)

prior to the first payment being made. Payments into caregivers' bank accounts should be limited to students who would be unable to administer their own account or in exceptional circumstances. CCN cannot accept responsibility if incorrect bank details are provided or if payments made do not reach the nominated account.

Unaccompanied Asylum-Seeking Child (UASC)

Where a vulnerable young person is also an Unaccompanied Asylum-Seeking Child (UASC), payments will be made via BACS to their bank account if they have one or paid directly onto the prepayment card issued by Norfolk Children's Services. Students will need to contact the bursary team to provide the details of the pre-payment card prior to first payment.

2.4 Attendance

Student attendance is monitored and should be a minimum of 90%. All absences must be authorised and notified to the college through the absence line immediately. Awards will be made as follows based on the following attendance levels unless confirmation is received from academic staff for extenuating circumstances. Attendance monitoring does not apply to students who have justified absences or have been suspended without prejudice.

Attendance thresholds (based on the month	Payment
prior to payment) 90-100%	100%
75-89%	75%
50-74%	50%
0-49%	0%

2.5 How to apply

The college uses an online bursary administration system called Pay My Student. The link can be found on the College website or by clicking on this link <u>City College Norwich (paymystudent.com)</u>. Students will need access to the email address they used on the application form for their college course, details of their household income and their bank account details to hand. If students require any help completing the application, then they can contact the bursary admin team at <u>bursaryadmin@ccn.ac.uk</u> or on 01603 773063.

2.6 Application timeline

Applications open in July 2024 prior to enrolment. You will need to have an active college course application before you can apply for the bursary. We will only issue an award once you have been enrolled. If you have not made an application prior to enrolment, you must apply as soon as you can once you have enrolled. The Vulnerable bursary does not have limited funds as it is fully funded by central Government and stays open throughout the year.

3. Free College Meals (FCM)

The 1996 Education Act requires maintained schools, academy sixth forms & FE (Further Education) funded institutions to provide free meals to disadvantaged students who are aged 16-19 or 19-24 with an EHCP. Free meals are provided to eligible students for each day that they attend timetabled

lessons. Institutions currently receive £2.53 per student per meal. The college uses the 16-19 bursary to top up this amount to £5 per student, per day, per meal in recognition of inflation.

Students who received free school meals (FSM) at school currently have transitional protection and will continue to receive FCM even if they are no longer eligible. This applies to any student who received free meals on or after April 2018 and they will continue to be eligible until March 2025 and then until the end of their phase of education.

3.1 Eligibility

To be eligible for FCM, students must meet the eligibility criteria for the 16-19 bursary as set out in the 16-19 Free Meal guidelines⁴.

Students are defined as disadvantaged if they, or their parents, are in receipt of one or more of the following benefits.

- Income Support
- income-based Jobseekers Allowance
- income-related Employment and Support Allowance (ESA)
- support under part VI of the Immigration and Asylum Act 1999
- the guaranteed element of State Pension Credit
- Child Tax Credit (provided they are not entitled to Working Tax Credit and have an annual gross income of no more than £16,190, as assessed by Her Majesty's Revenue and Customs (HMRC))
- Working Tax Credit run-on paid for 4 weeks after someone stops qualifying for Working Tax Credit*
- Universal Credit (UC) with net earnings not exceeding the equivalent of £7,400 for each year (after tax and not including any benefits they get)

*Working Tax Credit is not a qualifying benefit for FCM. Only Working Tax Credit run-on which is paid 4 weeks after someone stops qualifying for Working Tax Credit.

Students will be asked to provide evidence of eligibility unless they were previously year 11 students under transitional protection, in which case the information will be obtained from the local authority.

3.2 Awards

In the academic year 2024-2025, the College will provide each FCM eligible student with £5 for each day they have timetabled lessons.

3.3 Payments

The payment will be uploaded onto each student's college ID card allowing them to make contactless payments at any food outlet on campus. Payments will be made on each day students have timetabled classes and will be available from 6.30am each day. The ID card will be refreshed each day; any unspent money cannot be carried over. By implementing a cashless campus, we aim to safeguard students, and remain compliant with the FCM processing guidelines.

⁴ Free meals in further education funded institutions guide: 2024 to 2025 academic year - GOV.UK (www.gov.uk) published 27th March 2024

Eligible students who are participating on a course with work experience or industry placements can contact the bursary admin team at bursaryadmin@ccn.ac.uk or on 01603 773 773 and request a FCM offsite/placement form. Completion of this form, signed by the student's tutor or academic representative, will enable a cash alternative to be paid on the days which they would normally be at college. For block placements, a cash alternative will be available for all days at placement.

Cash alternative payments will be made by BACS into a bank account which should be in the student's own name. Students without bank accounts at the time of application should make effort to open a bank account prior to the first payment being made. Payments into caregivers' bank accounts should be limited to students who would be unable to administer their own account or in exceptional circumstances. CCN cannot accept responsibility if incorrect bank details are provided or if payments made do not reach the nominated account.

3.4 Attendance

Except for an offsite meals cash alternative, FCM money is only accessible via students' college ID cards and can only be used for contactless payments at food outlets on campus. FCM can only be accessed by students' coming to college and attending timetabled lessons.

3.5 How to apply

The college uses an online bursary administration system called Pay My Student. The link can be found on the College website or by clicking on this link <u>City College Norwich (paymystudent.com)</u>. Students will need access to the email address they used on the application form for their college course, details of their household income and their bank account details to hand. If students require any help completing the application, then they can contact the bursary admin team at <u>bursaryadmin@ccn.ac.uk</u> or on 01603 773063.

3.6 Application timeline

Applications open in July 2024 prior to enrolment. You will need to have an active college course application before you can apply for the bursary. We will only be able to process your application once you have an offer for a course and will only issue an award once you have been enrolled. If you have not made an application prior to enrolment, you must apply as soon as you can once you have enrolled.

4. Residential

The Residential Bursary Fund (RBF) is intended to support students who are studying a course in a specialist area, not a course which is widely available locally. For the purposes of this policy, the courses which are eligible are;

- Land based courses at Levels 2 and 3 (must not be available locally to the student's home and/or must be required to attend unsociable hours on a regular basis)
 - Agriculture
 - Animal Care/Management/Nursing/Science
 - Environmental Conservation & Countryside Management
 - Equine Care/Management
 - Floristry
 - Forestry & Arboriculture
 - Horticulture
 - Land based technology

- Sport specialisms at Level 2 and 3 (must not be available locally to the student's home and/or must be required to attend unsociable hours on a regular basis)
 - o Performance and Excellence Golf & Rugby pathways
 - Sport Outdoor Leadership

Priority will be given to students who live more than 15 miles from the campus.

4.1 Eligibility

Financial eligibility is primarily based on the level of household income (including all benefits stated above in section 1.1) as follows:

- Net income up to £30,000 pa
- For families with multiple siblings, the threshold will be increased by £1000 per additional child up to a maximum of £38,000 pa. (evidence required)

The RBF award may only provide partial accommodation costs depending on individual need, the household income and the number of applications received. The funds are limited and are awarded on a first come, first serve basis.

4.2 Awards

Where possible, the college will aim to provide funds to cover at least 80% of the accommodation fees. If funds allow, it may be possible to cover 100% of the accommodation fees.

The bursary may also be able to provide support with student travel costs getting to and from college accommodation. The college is limited to spending no more than 15% of the RBF on travel costs. If these funds are depleted within the academic year, the college will use the discretionary bursary.

4.3 Payments

Accommodation

Once an award has been made for accommodation, termly payments will be made via internal transfer to the College's finance department for accommodation. No funds will be paid directly to the student.

Food allowance

Students receiving Residential Bursary will also receive a food allowance of £15 per day to spend on breakfast, lunch and dinner provided at the college food outlets.

The food allowance will be uploaded onto each student's college ID card allowing them to make contactless payments at any food outlet on campus. Payments will be made each weekday and will be available from 6.30am each day. The ID card will be refreshed each day; any unspent money cannot be carried over. By implementing a cashless campus, we aim to safeguard students, and remain compliant with the FCM processing guidelines.

Eligible students who are participating on a course with work experience or industry placements can contact the bursary admin team at bursaryadmin@ccn.ac.uk or on 01603 773 773 and request a FCM offsite/placement form. Completion of this form, signed by the student's tutor or academic representative, will enable a cash alternative to be paid on the days which they would normally be at college. For block placements, a cash alternative will be available for all days at placement.

Cash alternative payments will be made by BACS into a bank account which should be in the

student's own name. Students without bank accounts at the time of application should make effort to open a bank account prior to the first payment being made. Payments into caregivers' bank accounts should be limited to students who would be unable to administer their own account or in exceptional circumstances. CCN cannot accept responsibility if incorrect bank details are provided or if payments made do not reach the nominated account.

Travel

Travel allowance will be paid by BACS in equal instalments on the last Friday of each month starting in September.

4.4 Attendance

If a student stopped attending and was withdrawn from their course or withdrew from their course for any other reason, then the accommodation offer would be withdrawn, and no further funds would be awarded.

4.5 How to apply

The college uses an online bursary administration system called Pay My Student. The link can be found on the College website or by clicking on this link <u>City College Norwich (paymystudent.com)</u>. Students will need access to the email address they used on the application form for their college course, details of their household income and their bank account details to hand. If students require any help completing the application, then they can contact the bursary admin team at <u>bursaryadmin@ccn.ac.uk</u> or on 01603 773063.

4.6 Application timeline

Applications open in July 2024 prior to enrolment. You will need to have an active college course application before you can apply for the bursary. We will only be able to process your application once you have an offer for a course and will only issue an award once you have been enrolled. If you have not made an application prior to enrolment, you must apply as soon as you can once you have enrolled.

Where students leave part way through the year, their RBF payments should stop in the same way as payments from any other student financial support scheme.

Where students change study programme part way through the academic year, for example, they enrolled on a specialist programme but swap to a general FE programme, the College will consider the specific circumstances when deciding whether RBF should continue. The College will not automatically continue with RBF payments without review.

5. Care Leaver Apprenticeship bursary

5.1 Eligibility

To be eligible for a Care Leaver Apprenticeship bursary, the apprentice must be;

- o Aged under 25 at the time they start their apprenticeship
- Not have received the care leavers' bursary before
- o be either an eligible child, a relevant child or a former relevant child

By eligible child, we mean a young person who is;

o is 16 or 17 years old

- has been looked after by a UK local authority or health and social care trust for at least a period of 13 weeks since the age of 14
- o is still looked after by a UK local authority or health and social care trust

By relevant child we mean a young person who is;

- o is 16 or 17 years old
- o has left care within the UK after their 16th birthday
- o was an eligible child before leaving care

By former relevant child, we mean a young person who is;

o under 25 who was either an eligible or a relevant child before turning 18.

We advise that young people should speak to their local authority personal adviser for guidance on their leaving care status. Written confirmation of care leaver status will be required to comply with the ESFA guidelines.

5.2 Awards

For apprentices who start their apprenticeships up to and including 31 July 2023, the bursary is a single payment of £1,000.

For apprentices starting their apprenticeship on or after 1 August 2023, the bursary will be £3,000.

5.3 Payments

For apprentices starting their apprenticeship up to and including the 31st of July 2023, the payment will be made in one payment once the apprentice has been on their apprenticeship for at least 60 days. Student will be paid directly from the College within 30 days of receiving the funds from the ESFA.

For apprentices starting their apprenticeship from the 1st of August 2023, payments are made in instalments over the first year of apprenticeship.

Payments will be made by BACS into a bank account which should be in the student's own name. CCN cannot accept responsibility if incorrect bank details are provided or if payments made do not reach the nominated account.

5.4 Attendance

Apprentices must be on their apprenticeship for a minimum of 60 days before they are eligible for the care leaver apprenticeship bursary. Only one payment can be made per individual, so should an apprentice leave their apprenticeship and enrol on another apprenticeship, they will not be eligible for a further payment.

5.5 How to apply

Apprentices should inform the bursary team of their status once they are enrolled on the apprenticeship programme including providing details of their start date and written proof of status.

5.6 Application timeline

The bursary team will make the application on the student's behalf once the 60 days has passed. The ESFA pay the College directly, who will then pay the apprentice within 30 days of receiving the funds.

6. Charity Bursaries

The college also administers and has information on local Charity Bursaries. There are various bursaries available with their own income thresholds and eligibility criteria. Where all other avenues of financial support have been exhausted, students can contact the bursary team to enquire after Charity funding and complete an application form or collect details of any Charities who administer their own applications. For further details please contact the bursary team at bursaryadmin@ccn.ac.uk or on 01603 773063.

7. General information for all bursary applicants

7.1 Unsuccessful applicants

Unsuccessful applicants will be contacted by email via the Bursary administration system Pay My Student or emailed directly by a member of the student finance team. Applicant details will remain on the system for the remainder of the academic year and applicants will be contacted should they become eligible due to funding or income threshold changes.

7.2 Appealing a decision

Appeals should be directed to the Assistant Principal, Student Services via the Bursary Admin email bursaryadmin@ccn.ac.uk in the first instance. Should further evidence or re-assessment change the outcome of the application, then a letter will be sent via the Bursary administration system and the award payments will be set up. If no change is determined, then this will be communicated to you in writing.

7.3 Data Protection

Student records are kept for 6 years after the year of attendance in line with GDPR (General Data Protection Regulation), after which electronic records are deleted and paper records are securely disposed of. Please see our College Data Protection policy for more details⁵.

7.4 Fraud

The bursaries are Government funded and as such the college takes any cases of fraud very seriously. Any application which is found to be fraudulent through false representation of household income or of other eligibility rules may be cancelled. The money will be recovered, and the student will be subject to the College's disciplinary procedure. The college may refer the matter to the Police.

⁵ Data Protection Policy (ccn.ac.uk)