

General Data Protection Regulations (GDPR) Enquirer / Student Privacy Notice

Why are we providing this notice for you and who can you contact?

In our service as a college we need to hold certain information about you (your 'Personal Data'). This notice will inform you about the data we hold about you and how we use it. It has been prepared in accordance with the UK General Data Protection Regulation ("GDPR") and the Data Protection Act 2018.

If you have any questions regarding your information or anything contained within this Privacy Notice please email: dataprotection@cornwall.ac.uk or write to:

Data Protection Officer, Cornwall College, John Keay House, Tregonissey Road, St Austell, Cornwall.
PL25 4DJ

What personal data do we hold?

Please be aware that if you do not wish to give consent for us to hold and process any of your personal data then the College may not be able to offer you a course place and may withdraw any offer made.

The following points give you an indication of the personally identifiable data we could ask for and hold about you:

- Contact details: including name, address, telephone, email
- Identifying details: including date of birth, gender, national insurance number
- Information about your next of kin, country of birth, eligibility for free school meals, religion, ethnicity, health information, doctor's details, behaviour record, sex-related information
- Whether or not you have a learning disability or difficulty, and if so whether you have an Education Health Care Plan (EHCP)
- Biometric data (photograph for ID Card)
- CCTV is present on some college sites for the protection of students, staff and premises

If you provide us with personal information about other individuals in case of emergency e.g. parents, guardians please ensure you make them aware that you have done so as we are required to contact them independently to confirm their consent to act in this way and for us to hold their personal information in line with this Privacy Notice.

How do we obtain personal data?

We obtain the majority of this data direct from you. We will collect personal data from the point you first contact the college in order to support you in your decision to undertake training with us and ensuring that you are offered a suitable programme at the correct level for you. The personal data we hold will increase as you progress through to enrolment, with the enrolment form confirming your training with us, asking for additional information that we haven't captured from you before that point and your consent to process and use your data in the way we'll describe later in this policy. We obtain further detail through the period of your training with us; this could include (list is not exhaustive) information from previous schools, attendance information, any support you need, exam / assessment results, Special Educational Needs Disabilities (SEND) information, fees and payments etc and records relating to the previous qualifications you have undertaken from your Personal Learning Record.

What is the legal basis on which we collect and use your personal data?

Cornwall College Group holds your personal data for a variety of reasons, but in the majority of instances this will be in our role of 'Data Processor' for the Government, their agencies or other funding bodies that provide full or partial funding for your training. The information we collect on their behalf is a mandatory requirement to release the funding to support you and / or is processed as part of our public interest task of providing education to you. Where that information is a special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

If you are funding your training / qualification yourself then we will still require personal information to enable us to record and monitor your association with the college for the time you are enrolled. Depending on the qualification you are undertaking you may still need to complete the standard enrolment form to ensure we can administer and process your qualification with Awarding Bodies and support you in your training with access to our services, premises and technology e.g. library, ID badges.

How do we use Your Personal Data?

When you first contact the college the information we obtain from you will be to maintain contact with you to answer any questions you have and guide you through the process of applying, ensuring eligibility and suitability for the training you want to undertake with us.

When you enrol, we are required to submit your data to Government Agencies and their partners through secure transfer methods to confirm your training and obtain partial or full funding (depending on eligibility) against your fees, obtaining a Unique Learner Number for you to assist this and / or Awarding Bodies that govern the registration, examination and certification of any formal qualifications you undertake. For further information on how the Government use your data the following link / path will take you to a document on their website: <https://www.gov.uk/government/publications/esfa-privacy-notice>

We will use your personal data to support your learning, enable access to college services, maintain contact with you throughout the duration of your time with us and update it as circumstances change either for you personally or relating to your training.

In relation to any marketing we do, if you have previously studied at the College or commenced an application process with us before, then we will send you information about the courses we provide on the basis of our legitimate business interests. In doing so, we will comply with the requirements of the "soft opt in" and offer you an opportunity to refuse marketing when your details are first collected and in subsequent messages (by way of own unsubscribe). Any other marketing carried out will be on the basis of consent.

Students Under 18

Whilst you are under 18, your parent(s) and/or guardian(s) will only be contacted or information disclosed to them when the relevant personnel within the College believes it is in your best interests to do so, following full consultation with you, where possible. This may be in connection with your attendance, academic progress or performance and/or with disciplinary proceedings for academic and non-academic offences. You will be encouraged to enable your parents / guardians to view your on-line Termly Report as this contains summary information on your progress, performance and highlighting any concerns that the College may have regarding your academic progress. You will have an opportunity to see and comment upon this report when it is prepared.

How do we share your personal data?

We do not store or transfer your personal data outside Europe and we do not pass your personal information to organisations for marketing or sales purposes.

As mentioned previously, after enrolment we are required to share your data with one or more of the following organisations to support your training / education:

- Education and Skills Funding Agency (ESFA) – Funding body for FE courses
- Office for Students (OfS) – Funding body for HE courses
- Student Loan Company, Local Authority, Sponsoring Body – Funding bodies for FE
- MIAP – Government Agency that provides us with a Unique Learner Number for you and creates a Personal Learner Record that contains details of all the learning and qualifications you have undertaken (which you have access to).
- Awarding Body / Universities – as appropriate to administer formal qualifications you are taking
- Careers South West – An agency commissioned by the Government to monitor and support 16-19 year olds in preparing for adult and working life.
- Previous Schools - to authorise movement of your personal files from them to us to assist with ongoing safeguarding, and support the maintenance of destination information required by Government Agencies.
- Partner (third party) organisations – where we work closely with other organisations to provide training and learning that supplements the College's own provision (this also applies to any trips / journeys arranged as part of the curriculum delivery).

In certain circumstances the College may be required, without your consent, to disclose personal data to the Police or other Public Authorities for the purposes of the prevention or detection of crime, or where it is necessary to protect your vital interests, or in an emergency.

We receive requests from organisations to validate personal references and qualifications in order to support employment opportunities, these are dealt with on a case by case basis to ensure we are compliant with Data Protection Laws.

Your Rights In Relation To Your Personal Data

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

How long do we keep your personal data?

As an educational establishment there is an expectation that we will hold personal information in relation to learning or qualifications indefinitely to maintain a record for the student where practically and technologically possible. However, although we do not need to retain all of your personal information to do this, if your training with us is partially or fully funded through any Government or associated agency funding bodies then we are required to retain a data set (determined by them) of your personal information for the time period that they set. Once that time period has passed we will only keep personal data that enables us to confirm identification for your learning / qualification information if we receive a request for it in the future where our archive system allows.

How do we manage the security of your personal data?

The information we collect from you is entered onto software systems held on secure servers that are subject to strict procedures and security features to minimise the risk of unauthorised access and protect your personal data against unlawful processing, accidental loss, destruction and damage.

Where we have provided you with a college account and password that enables you to have access to certain parts of our electronic systems, you are responsible for keeping this password confidential. Please do not share this password with anyone.

Do we monitor your use of the college's computers?

We keep an eye on how you use the College's equipment and computers and what websites you go on when you are browsing the internet at College, including the use of your own equipment when using the College's wireless network. This is because we have legal obligations to protect you and others, and we also have a legitimate interest in making sure you are using our computer equipment correctly and that you are not looking at any inappropriate content. If you want to browse the internet privately, you will need to use your own devices which are not linked to the College's network or internet connection. At the start of your study programme you will be provided with a full copy of the College's IT Acceptable Use Policy which provides more details on the terms and conditions of using our services. We also track your login activity which is primarily used to inform the overall demand for our IT services.

Finally, we can use internet and login history for investigatory purposes and may provide such information to the Police where there is a legal reason to do so.

Updates to this Privacy Notice

This Privacy Notice will be reviewed at scheduled intervals, or sooner if there are updates to the information contained within it (we will notify you by email if this happens). The Cornwall College Website will always display the most up to date version: <https://www.cornwall.ac.uk/college-governance/>