

Coleg Cambria Learner Privacy Notice

This privacy notice is to let you know how Coleg Cambria collects and processes your personal information, and who we share this data with. This includes what you tell us about yourself, what we learn by having you as a learner, and the choices you make about what information you want us to send you, or share with others. This notice explains how we do this and tells you about your privacy rights and how the law protects you. Coleg Cambria is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

The types of information we collect

We may collect the following types of information about you over the duration of your studies, depending on the type of course you are on and your individual needs:

- information relating to your identity including your name, previous names, contact information, email, date of birth and gender;
- information about your next of kin and/or emergency contact;
- your National Insurance Number, nationality, and copies of identity documents such as your passport or national identity card relating to your right to access government funding for education;
- information about your current and future study choices;
- information about your intended career choice(s);
- information relating to your academic history or current progress such as your predicted GCSE grades, actual qualifications achieved, exam results, assessment scores and dates of study;
- information relating to your employment, particularly where your employer is supporting your studies;
- information relating to your personal circumstances where this is relevant to your studies, or to us providing you with appropriate support;
- details about your first language, and welsh language levels and preferences;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- details about your criminal convictions;
- your bank account details where we are required to make payments directly to you, as part of your support programme;
- details of any state benefits you are entitled to in order to assess if the fees you pay for certain courses can be reduced;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

How we collect your information

We may collect information about you in different ways, for example:

- from the information you give us when you apply or enrol on a programme of learning with us via our application and enrolment forms;
- when you complete our registration forms at one of our open events;
- when you communicate with us by telephone, email, website, or in person to make enquiries or raise concerns;
- from other organisations such as the Learner Records Service, your previous school, Awarding Bodies, or your sponsor/employer if they are supporting your studies;
- in other ways when you interact with us, during the course of your studies, for one, or more, of the reasons set out below.

Data will be stored in a range of different places, including in your learner file, in the organisation's learner data management systems and in other IT systems (including the organisation's email system).

How we use your information

The college needs to process your data in order to provide our education service to you and meet our contractual obligations. To do so, the information we collect about you, including special categories of data (sensitive personal data), may be processed in different ways, these include:

- Enrolment, and associated advice and guidance;
- Managing your education, including:
 - The provision of teaching and learning services (e.g. registration, assessment, attendance, academic progress, examinations, certification)
 - Maintaining learner records;
 - Registration with Awarding Bodies for your qualifications;
 - To contact you, via email, phone, text or post about issues relating to your course(s).
- Providing security, library, IT and information services;
- Providing support services, including:
 - Direct learning support (e.g. Student Services, Additional Learning Support, Careers advice, Health and Wellbeing);
 - Providing references on your behalf
- Administering finance (e.g. EMA/ALG payments, course fees and Learning Allowance payments)
- Other administrative purposes:

- Providing information (e.g. college closures, IT Support, site restrictions, transport information etc)
- Carrying out research and statistical analysis;
- Ensuring safeguarding across the organisation;
- Carrying out audits;
- Compliance with Health and Safety legislation;
- Preventing and detecting crime;
- Compliance with our Prevent duty;
- Dealing with complaints, grievances and disciplinary actions;
- Promoting our courses, events and opportunities
- Monitoring our performance
- CCTV: we use closed-circuit television (CCTV) recording devices for the purposes of crime prevention and prosecution of offenders, for identifying accidents and incidents and to safeguard students, staff and visitors. We retain CCTV recordings securely for no more than 28 days unless it is being used to investigate an alleged crime or an incident in which case it may be retained for up to 2 years following the conclusion of any investigation. The data captured on CCTV will be visible and accessible by authorised College staff, and our third-party security contractors. The data may also be shared with the Police.

Data Protection Law

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- when it is our legal duty, or
- when it is in our legitimate interest, or
- when you consent to it.

Our legal basis for processing your information

We may process your data as it is necessary for us to do so in order to fulfill our contract, and commitments, with you, or because you have requested us to do so before entering into the contract. This relates to the following processing activities:

- To interact with you before you begin your studies, as part of the enrolment process (for example, to send you information about your course or answer your enquiries)
- Once you have enrolled, to provide you with the services outlined in this notice above;
- For any other purpose for which you provide us with your personal data.

For our own, or a third party's legitimate interests, such as:

- To provide you with educational services;
- To monitor the performance and effectiveness of the institution;
- To promote equality and diversity throughout the organisation.

We may also process data because it is necessary for our compliance with our legal obligations, in this respect we may use your personal data for the following:

- To meet our regulatory obligations such as compliance with safeguarding;
- For the prevention and detection of crime;
- In order to assist with the investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- It is necessary for medical purposes;
- It is necessary to protect yours or another person's vital interests.

Where we have your explicit consent to:

- promote our forthcoming courses and opportunities to you;
- invite you to relevant social media groups;
- maintain contact with you after you have finished your studies with us to gain your feedback on our services or provide you with support to further your education;
- invite you to join our Alumni.

Sharing information with others

For the purposes referred to in this statement we may share your data with the following third parties. You are given the opportunity to opt in to some of these data sharing agreements when you enrol with us, and you can amend these choices at any time, but you should consider carefully the possible impact of not sharing your data in certain situations. Coleg Cambria is committed to only sharing limited and necessary data with third parties and to ensuring it secure transmission to these organisations/persons:

- Learner Records Service for the provision of a Unique Learner Number and access to your academic records;
- Government departments and agencies where we have a statutory obligation to provide information (including Department for Education and Skills (Wales); Department for Education (England); Home Office; Careers Wales, Welsh European Funding Office);

- with the relevant university where you are undertaking a Higher Education programme with us;
- with your school where you are undertaking a School Link course with us;
- parents, guardians, or next-of-kin, for learners under the age of 18 (where there is a legitimate reason for disclosure);
- current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance);
- Awarding bodies related to the qualification(s) you are undertaking with us;
- Wisepay to provide you with an online account which allows you to pay for key college services and resources as required;
- with relevant external organisations where it is necessary for us to do so to comply with our safeguarding duty;
- The Football Foundation for the purpose of uploading into the Upshot platform to enable the College to provide sports health and wellbeing services to you;
- Internal and external auditors;
- third parties conducting surveys (limited, essential only);
- crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
- external printing companies for personalised information or products relating to your studies;
- external suppliers and contractors whom we employ to provide IT systems and security systems etc, and who will have access to data in order to perform their contractual duties.

How long we keep your personal information

The College will hold your personal data for varying amounts of time depending on what it is. The amount of time your data is held is detailed below:

Type of Record:	Retention:	Why we keep it:
Student Enquiries, Applications & Enrolment		
Records documenting the handling of enquiries from prospective students	The end of the following academic year.	Generally enquiries relate to enrolments in the current or following academic year.
Records documenting the handling of applications for learners who do not later enrol.	The end of the following academic year	In order to respond to enquiries.
Disclosure and Barring Service disclosures for students that will have contact with children or vulnerable adults	6 Months	DBS code of practice
Students' Academic Records		

Full student records, including documents relating to application/enrolment; academic achievements; transfer, withdrawal or termination of studies; first destination surveys	Current Academic Year + 10 years	Permits college to provide references for a reasonable length of time. Also, time limits on litigation.
Information related to examinations and academic performance (dates of study, programme of study, marks, final award etc)	Perpetuity	Provision of references and confirmation of registration/final award etc.
Records documenting the conduct and results of disciplinary proceedings against individual students.	Current Academic Year + 6 years.	Limitation Act 1980
Records documenting the handling of formal complaints made by individual students.	Current Academic Year + 6 years.	Limitation Act 1980
Records documenting individual students' attendance	Current Academic Year + 10 years	Permits college to provide references for a reasonable length of time.
Course Administration		
Class lists & Schedules for submitting/marking work.	Completion of studies + 1 year	In order to respond to enquiries.
Documents referring to coursework marks/grades and assessment.	Completion of studies + 1 year	In order to respond to enquiries.
Students' Academic Work		
Student Coursework	Current Academic Year + 1 year	Awarding body requirement.
Study Skills		
Documentation used by the Study Skills Team to allow a student to access the level of support that they need. This includes documents referring to the biographical details, course details, history of support needs, abilities and difficulties, education psychologists' reports, Study Skills Action Plan, letters of referral for assessments, other correspondence.	Current Academic Year + 6 years	Permits college to provide information to previous students for a reasonable length of time. Also, time limits on litigation
CCTV		
CCTV footage from various locations across our sites.	Up to 28 Days (up to 2 years following the conclusion of any investigation)	To provide evidence for any investigation relating to crime, safeguarding, other relevant incidents.
Health and Safety Records		
Accident books, and records and reports of accidents	6 years	Social Security (Claims and Payments), Regulations 1979; RIDDOR 1985; Time limits on litigation
Records documenting organization of students' work/study placements to ensure risk assessments are performed	Completion of studies + 1 year	In order to respond to enquiries

Your rights and choices

Under the General Data Protection Regulation (GDPR) you have the following rights:

- To be informed about the data Coleg Cambria holds about you, and how and why we process it;
- To access the data which Coleg Cambria holds about you;
- To require Coleg Cambria to rectify any inaccuracies within this data;
- To restrict processing of your data, if data is inaccurate or being processed unlawfully;
- To object to your data being processed if you suspect that what we are doing is not legitimate;
- To request that your data is deleted (in some circumstances, where we have no lawful right to retain it);
- To request that we send a copy of your data electronically to you, or a third party;
- To lodge a complaint with the Information Commissioner's Office (ICO), who is our supervisory authority for data protection. (<https://ico.org.uk/concerns/>)

If you would like to exercise any of these rights, please contact: dpo@cambria.ac.uk.