

Student Privacy Notice

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1 Introduction

- 1.1 This Student Privacy Notice explains how Wiltshire College & University Centre (Data Controller) protects the personal data it collects, informing students, parents, employers and other parties involved in the student journey about their data protection rights and how the college complies with our statutory obligations. This notice covers applicants and enrolled students across all provision types including full time study programmes, part time courses, higher education, and apprenticeships.
- 1.2 This notice is written in conjunction with the college Data Protection Policy and has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Data Protection Act 2018.
- 1.3 The College’s registration reference number with ICO is Z8201404.

2 Accountability

- 2.1. This section details the accountability, the purpose and the reasons for Wiltshire College & University Centre processing your information.
- 2.2. The majority of the information we process is collected under ‘**Article 6**’ in relation to a **public interest task** imposed on us to meet the educational statutory duties outlined by the DfE, but we also collect some information under **legitimate interests** or via **consent** collected directly from you. This allows us to collect the information we need on behalf of the government to draw down funding for your education, or process your achievements. We are also required to provide reports and returns to other government departments, public bodies, schools and local authorities in order that they can comply with their own statutory duties. We may also collect additional medical, healthcare and safeguarding information where the processing is necessary to protect the vital interests of the data subject.
- 2.3. The College processes data for the purpose of student recruitment, admissions, enrolment, Careers/Support and IAG services, payment of fees, student bursaries, awarding body registration, teaching and learning (including attendance, progress, performance and achievement), examinations, graduation, quality and improvement purposes.
- 2.4. When you apply to study at Wiltshire College & University Centre we will collect personal details from you for the purposes of administering your application. As part of your application we will use the information provided to communicate with you about your application, interview arrangements, inviting you to open evenings and enrolment events. These communications may come from a college email address or via our third-party communications provider. We may access information via the LRS in relation to your previous qualifications and achievements to check you meet the requirements of the course, but we do not receive any information about previous Exam Access Arrangements (if this is needed it will need to be a new request when you start your course). For applicants that are under 18 we may share your application details with your school or local authority for the purposes of their statutory duty to monitor participation of young people in education and training. For learners under 18 we may contact your parent/guardian with general information about events, information about access arrangements, and information about enrolment dates to ensure attendance during holiday periods. You may be asked to opt in to sharing details of your application, offers and your individual enrolment dates with your parent/guardian. The college may also contact your parent/guardian to confirm their personal details are correct, advise them of the purpose of us holding their information and allow them to opt into further marketing communications with the college.

- 2.5. Once enrolled we will use your personal information for the purpose of managing and administering your education. This will include marking registers, providing class lists, sending out relevant communications, performance reports, registering you with awarding bodies for the qualification(s) you are studying and collecting progression/destination information. For learners under 18 we will also use the contact details collected as parent/guardian on the basis of there being a legitimate interest to engage with parents and guardians to ensure student engagement and to ensure they achieve their qualifications and goals. The college will also contact parents/guardians to ensure we are developing an appropriate 'Careers programme'. The Gatsby guidance for colleges [Gatsby Good Career Guidance Summary for Schools](#) requires us to engage with parents as a key influencer of young people's career decisions. The expectation for the programme is that we must now actively communicate our activities with parents and assess the impact of the careers programme by engaging with parents and carers to evaluate the service. The college will therefore use the information collected in the enrolment process to communicate with parents/guardians to support and encourage them to access and use information about careers, pathways and labour market information to ensure the learners in their care are fully supported in their decision making process.
- 2.6. Specifically for apprentices we collect information for the purpose of delivering and managing your apprenticeship with your employer. We may also use the LLDD information supplied on your application form, and subsequent initial assessment diagnostics, to assess what learning needs, adjustments or support requirements you may require to allow you to fully complete your apprenticeship training.
- 2.7. Some of the data we collect is deemed to be '**special**' category (such as ethnicity, learning difficulties/disabilities, health conditions) and we process these under '**Article 9**' because these fields are either required under our educational statutory duties, substantial public interest or because it's part of our safeguarding duty of care.
- 2.8. We also process **Criminal conviction** information under '**Article 10**' because there is a substantial public interest for us to do so, and so we meet our statutory safeguarding obligations. All applicants are required to disclose any unspent criminal convictions or cautions, or spent convictions where the course you are applying for is related to working with children or vulnerable people and the offence is therefore considered exempt from the Rehabilitation of Offenders Act (ROA 1974) . If information relating to offences is not given or is incomplete, then the College reserves the right, at any stage, to reject your application or remove your enrolment at the college. However if at any time when you are enrolled, or during your studies, you are arrested by the police and charged with a criminal offence, you must report this immediately to your Designated Safeguarding Lead or send an email to safe@wiltshire.ac.uk
- 2.9. On occasions we may be required to process your personal data for other reasons however we will only do so where a Lawful Basis applies.

3 What Personal Data do we collect?

3.1 Personal data and special category data will be collected during the application and enrolment processes and may include the following data fields:

- Name
- Date of birth
- Contact details (address, email and telephone/mobile numbers)
- Emergency and Next of Kin
- Parent/Guardian details for learners under 18
- Nationality
- Ethnicity
- Gender
- First and Second languages
- Marital Status
- Employment Status, employer or sponsor details
- National Insurance Number
- Residency and benefit details
- Bank details and payment information (for payment of fees, bursaries, trip costs or setting up direct debit schedules for payment)
- Educational Background including previous schools, qualifications and grades
- Learning disabilities and learning difficulties, EHCPs, support needs and safeguarding records
- Free school meal eligibility
- Long term medical conditions and health questions
- Criminal Convictions
- Achievements and destinations
- Photographic image for student ID cards
- Learner Journey records (including attendance, behavioral records, progress and support comments)

3.2 Once enrolled additional information may be collected on a voluntary basis such as religion and sexual preference to inform quality and curriculum development.

3.3 Information may be obtained directly from the individual, or in some cases from a third-party organisation involved in the services provided by the College that has obtained the information in the first instance.

3.4 All students and visitors should have a reasonable expectation of being captured on CCTV on a daily basis.

3.5 Whilst the primary use of CCTV is for the following purposes, the College will regulate the use of it's CCTV system in a way that is consistent with an individual's right to privacy

- Increase the personal safety of employees and students and reduce the fear of physical abuse, intimidation, and crime.
- Protect college buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- Support law enforcement in a bid to deter and detect crime.
- Assist with the identification of actions / activities that might result in disciplinary proceedings against employees and students.

3.6 In exceptional circumstances the images may be viewed for investigatory purposes. The College will only collect and process the necessary information required for these purposes to fulfil its obligations, full details can be found in the college [CCTV Policy](#).

4 Retention of your information

- 4.1 We keep information in accordance with the college Retention of Documents and Archiving Procedures. Retention periods are set in line with the length of time we need to keep your personal information in order to manage and administer your education. The retention periods specified take into account our need to meet any legal, statutory and regulatory obligations. We will only retain personal data for as long as necessary to fulfil the purpose we collected it for, and for the purpose of satisfying any legal, accounting or reporting requirements.
- 4.2 As part of the public task imposed on us by the Department of Education, if you have received funding for your course we are expected to keep your enrolment records for 6 academic years after the year you complete your course (or leave the college) to evidence we have complied with the required residency and eligibility checks. This is for audit purposes and to ensure we have evidence for why you were entitled to receive fee waivers for your education.
- 4.3 Student work including assignments, assessments and portfolios will be kept for a maximum of 3 academic years to comply with awarding body requirements.
- 4.4 For more information on other retention periods you can refer to the college retention documentation.

5 Sharing of your information

- 5.1 We share personal information with third parties where required to do so by law, where it is necessary to administer the working relationship with you, or where there is a third-party legitimate interest in doing so. We only share the minimum information required.
- 5.2 The core external organisations we share information with are detailed below including the reason or purpose for sharing:
- **Department of Education** – We share your personal data to fulfil the public duty to prove eligibility for funding your education
 - **Local Authorities** (16-18 only) – To support them in fulfilling their statutory duty for young people to participate in education or training until their 18th birthday
 - **Schools** (16-18 only) - To support them in fulfilling their statutory duty to monitor the destinations of their school leavers
 - **Learning Records Service** (LRS) - A government portal that allows schools, colleges and providers to share learners previous achievements
 - **Parent/Guardians** (16-18 only) – to provide support in the young persons educational journey, performance, and progression
 - **Awarding Organisations** – to register/certificate the qualifications we deliver
 - **Student Loans Company** – if you have taken out a student loan to cover your course fees we have to confirm enrolment information and attendance
 - **Advanced** – They provide a range of student record systems to store your data
 - **Onefile** – They provide an apprenticeship ePortfolio system for managing and tracking our apprenticeship standards
 - **GroFar** – Used to administer college work placements and work experience
 - **Century** – Online learning materials for English, Maths and Initial Assessment
 - **OneGrade** – Used for student tracking and monitoring in-year performance
 - **HESA (Higher Education Statistics Agency) & the OfS (Office for Students)** – these are both higher education bodies which we have a duty to share information with about students enrolled to higher education courses
 - **UCAS** – we share application information for the purpose of enrolling onto higher education courses, as well as progression and destination information

- **Pay My Student** – System is used to administer the college bursary process
- **Employers** – Enrolment and performance information for apprentices, or sponsored students
- **Trade Unions** – to provide services and support to their members
- **Careers services** – to provide a range of support to students to help them navigate their career paths
- **Worldpay / Global Payments** – Payment service providers we use to process student payments
- **Debt Recovery Agencies** – for the purpose of recovering debt
- **Subcontractors and franchise partners** – the college has a few third party providers that deliver education on our behalf, data may be shared with them but only for the students they are teaching or providing resources for.

5.3 We may share your information with other third-party organisations where there is a lawful reason, or where there is a legitimate reason for doing so and where we have a data sharing agreement in place. This will be limited to only the information that is required for this purpose. We may be required to share information with other regulatory bodies, national bodies for the purposes of monitoring and research. We may also agree to share data with external agencies where we have a safeguarding concern. There may be additional information which is only shared with consent.

5.4 For students studying Higher Education courses you will be asked to participate in two external surveys; the National Student Survey (<https://www.thestudentsurvey.com/>) & Graduation Outcomes Survey (<https://www.hesa.ac.uk/innovation/outcomes/students>). The National Student Survey is aimed at final undergraduate students which gathers opinions about their time in higher education on their course and at their institution. The Graduate Outcomes survey captures information about the activities and perspectives of graduates 6 months after they finish their studies. We will hold your contact details after you graduate to enable completion of this survey. You have the right to object to HESA contacting you for the Graduate Outcomes survey. If you don't want to be contacted for the survey email info@graduateoutcomes.ac.uk

6 Transfer of information outside Europe

6.1 We do not actively transfer or store your personal data outside Europe. However some of the service providers we use are United States based or have bases in the United States. We have conducted full Data Protection Impact Assessments to ensure they are compliant with both UK and European standards but we have included their details below for information. Wherever possible we also limit the data shared to minimise risk.

6.2 List of system providers:

- **Mailchimp** (Provides marketing and communication services)
Privacy Notice information - <https://mailchimp.com/help/data-privacy/>
- **Century** (Provides Online learning materials for English and Maths)
Privacy Notice <https://www.century.tech/wp-content/uploads/2024/02/CENTURY-Tech-Privacy-Policy-2024.pdf>

7 Automated Decision Making

7.1 The college does not use automated decision making in any of its processing.

8 Your Data Rights and how to contact us

8.1 You have the right to request access to the personal information the college holds on you, which is the **Right of Subject Access**.

- ✓ To request access please send a written request detailing what information you would like access to. The more detail you can provide the easier it will be for us to provide you with the information you require.
- ✓ These requests should ideally be sent to the DP team GDPR@Wiltshire.ac.uk, or via the address details below.
- ✓ The college will acknowledge your request and wherever possible respond to provide the information you requested within 30 days. We may extend the time limit by up to a further two months if the request is complex.

8.2 In addition to this you also have the following rights in relation to your data:

- ✓ To be informed about what we do with the information we collect and how we use your personal data
- ✓ To be able to rectify inaccuracies in personal data that we hold about you
- ✓ The right to be forgotten, and request that your personal data be erased*
- ✓ To restrict the processing of your personal data
- ✓ To object to certain processing of your personal data by us*
- ✓ The right to move or port your data across different services or providers
- ✓ To withdraw consent (applies if information was collected on a consent only basis)

**Where information has been collected for the purpose of funding your education we are required by law to retain that personal information for audit purposes, so it may not be possible to erase or limit the processing of this data.*

8.3 For more information on exercising your rights, please contact our Data Protection Officer via the details below, or see our Data Protection Policy

<https://www.wiltshire.ac.uk/wp-content/uploads/2024/08/Data-Protection-Policy-1.pdf>

Wiltshire College and University Centre
College Road
Trowbridge
BA14 0ES
Email: GDPR@Wiltshire.ac.uk

8.4 If you are dissatisfied with the College response, you have a right to complain to the Information Commissioners Office (ICO).

The ICO contact details are:

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

Tel: 0303 123 1113 or 01625 545 745

9 Amendments Log

Version	Date of Issue	Amendment summary	Author(s)
V2.0	09 Jul 25	Fully re-written policy	Lisa Cheetham