

# YOUR PERSONAL DATA

## INFORMATION FOR STUDENTS

### INTRODUCTION

We could not exercise our responsibilities and fulfil our education, training and support obligations to you without collecting, holding and using your personal data. This guide explains what we do with your personal information and why. When you use specific College services we will give you further information at that time.

### WHO IS THE DATA CONTROLLER?

West College Scotland is the Data Controller for personal data we hold about you. Where we use the term 'our College', this includes all campuses of the College. We hold your personal data securely and restrict access to personal information to people who need to use it in the course of their duties. When collecting and processing information about you, we must comply with the UK Data Protection Act 2018, the European Union General Data Protection Regulation and other privacy laws that apply in the countries in which the College operates.

### WHAT PERSONAL INFORMATION WE COLLECT AND USE

We collect and hold personal information in all formats for the purposes set out in this guide.

- Personal and family details;
- Lifestyle and social circumstances;
- Education and student records;
- Relevant employment details;
- Financial information;
- Disciplinary and attendance records;
- Goods or services provided;
- Visual images, personal appearance and behaviours.

Where this is necessary to meet a legal obligation, or with your consent, we may also process sensitive information, also known as special categories of data, which may include:

- Racial or ethnic origin;
- Trades union membership;
- Religious or philosophical beliefs;
- Political opinions;
- Physical or mental health details;
- Genetic or biometric data used for the purpose of unique identification;
- Sexual life;
- Offences and alleged offences;
- Criminal proceedings, outcomes and sentences.

## WHY WE COLLECT AND USE YOUR PERSONAL DATA

**FOR ACADEMIC PURPOSES:** to provide you with teaching, learning and support services, assess your work, record your progress and award qualifications

What's our legal basis?

- For most of these activities the Further and Higher Education Act 1992 gives us legal authority to process your personal data where this is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the College as Data Controllers.

We collect and use your information to:

- Enroll you as a student;
- Administer our programmes of study and associated funding and fee arrangements;
- Monitor performance and attendance, supervise, conduct assessments and examinations, award and provide confirmation of qualifications;
- To give you access to student support, IT, library, careers, mentoring, social, sport, catering, archive, and other services to the College community;
- Deal with appeals, complaints and disciplinary matters promptly and fairly;
- Provide academic guidance and enable you to communicate with staff, your student representative and fellow students on your programme of study;
- Seek your feedback on our programmes and facilities.

Throughout your studies at the College, your work may be submitted to Turnitin®UK, a text matching

tool for assessment and referencing practice. More information on both services is available from the teaching staff.

#### FOR ADMINISTRATIVE AND FINANCIAL MANAGEMENT PURPOSES: To administer fees and paid-for services

What's our legal basis?

- If you pay fees or use paid for services we need to process your data to fulfil a contract you have entered into with us.

These may include:

- Fees and payments;
- Printing services;
- Catering services;
- Club and facility memberships; and
- Disciplinary fines.

#### TO MEET OUR DUTY OF CARE TO YOU AND OUR LEGAL OBLIGATIONS

What's our legal basis? Where this is necessary to:

- Comply with a legal obligation;
- Protect vital interests in an emergency;
- Exercise or defend legal claims or comply with court judgments;
- Provide medical and health services;
- Protect public health.

This may include:

- To meet our legal duty of care to you under health and safety and safeguarding laws;
- To provide counselling and health services;
- To protect your vital interests or someone else's e.g. in a medical emergency;
- To comply with a statutory obligation e.g. under tax or immigration law;
- To meet our obligations under equality law. Under the UK Equality Act 2010, we need to collect sensitive personal data about our applicants and students to assist with monitoring equality of opportunity and eliminating unlawful discrimination. We hold this information in strictest confidence and only disclose it, again in confidence, to bodies with a statutory duty to collect it, like the Scottish Funding Council. You can choose whether you want to provide information for this purpose. If a student or applicant declares that they have a disability, we have a duty to disclose this information on a need-to-know basis to staff to ensure that reasonable adjustments are made, enabling disabled students to meet their full academic potential.

## FOR PUBLIC SAFETY AND THE PREVENTION AND DETECTION OF CRIME

What's our legal basis?

- Legitimate interests.
- Where this is necessary for the prevention, investigation, detection or prosecution of criminal offences, including the safeguarding against and the prevention of threats to public security.

Processing for these purposes includes:

- Use of CCTV systems to monitor and collect visual images;

The College's premises and grounds are monitored by CCTV systems for the purposes of public safety, security and the prevention and detection of crime. CCTV footage may also be used for investigations or proceedings arising under the College's Complaints Handling Procedure.

- Monitoring use of IT facilities;
- Applying security, welfare and other procedural measures where necessary for the safety and security of students and the wider College community under health and safety and other relevant laws.

## TO PROMOTE THE COLLEGE

What's our legal basis?

- Where we have your consent;
- Where necessary for archiving purposes in the public interest.

We may take photographs, and other images and recordings of students for possible use in our publicity and promotional material in print and online on our websites and social media. We always inform people when filming and will only feature you in such promotional material with your consent. We keep copies of promotional material as a record of College life down the years.

## FOR ALUMNI ENGAGEMENT

What's our legal basis?

- For alumni engagement, processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- For marketing and fundraising, only where we have your consent;
- Where necessary for archiving purposes in the public interest.

The Further and Higher Education Act 1992 give us a positive duty to engage with our alumni and enable them to exercise their rights to be members of our graduates' association. We will send electronic communications for marketing purposes to alumni only with their individual consent.

## FOR ARCHIVING

What's our legal basis?

- Where this is necessary for archiving purposes in the public interest or statistical purposes.

While always protecting your rights to privacy we will:

- Keep a permanent archival record of your time studying with us;
- Retain copies of promotional material and other records of College community life that may include images and other data about students and alumni;
- Produce management and statistical information to monitor and improve our performance and our services to you and inform strategic planning, e.g. for recruitment.

## WHO YOUR INFORMATION MAY BE SHARED WITH AND WHY

We may publish or share your personal data only where we have your consent or where one of the following conditions are met.

**We may appoint people and organisations to work for us** and contract with them to act as data processors on our behalf for any of the above purposes. Examples include training, setting and administering examinations, payment and debt collection services, plagiarism detection systems, provision of email and other IT services, hosting communications services, IT systems maintenance, safety and incident management systems.

**We will also disclose limited personal data where this is necessary for the following reasons:**

#### FOR ACADEMIC PURPOSES

- **With a partner institution** to deliver a programme collaboratively or jointly between the College and the partner institution.
- **With our external examiners:** to check that our assessment of your work is fair;
- **For official independent assessment of our programmes.**

And to:

- Verify your attendance and qualifications, e.g. in a reference for a potential employer or agency;
- Confirm your attendance, progress and assessment marks to your sponsor or the institution through which you are studying (if this is not West College Scotland);
- Arrange a suitable industrial placement if this is part of your course;
- Administer your right to be a member of the Student Association and vote in its elections;
- Publicise your award in our graduation programme and in the list of awards we provide in press releases to news media and your previous school or college. You have the right to opt out of this;
- Enable you to participate in the national student survey or other official surveys that give us your feedback on our teaching quality and your student experience.

College graduation ceremonies are significant events for our graduates, their guests and our staff. These ceremonies are treated as public events and we will not seek consent for the following processing activities. This will apply to all students who are intending to graduate or may be eligible for an award and whether they attend a ceremony or not.

- Your name will appear in the graduation programme.
- If you graduate in person, your name and award title will be read out at the ceremony immediately prior to you walking across the stage.
- Crowd shots will be taken by the College photographers at the venue and at our graduation receptions and these may include images of you and your guests.
- The College may use appropriate crowd photographs in its promotional material in printed or electronic format.

You will be aware of any smaller group or individual photographs prior to these being taken. These images may be used to promote the activities of the College and may appear in any of our promotional material in printed or electronic form including web sites, in multimedia productions, course leaflets or prospectuses. If you do not wish to be photographed, you should tell the photographer before the photo is taken.

Visual images will be used and retained strictly in accordance with Data Protection Law and the College's records retention schedules. Please note that websites can be seen worldwide and not just in the UK. If you have any queries about, or objections to, the use of your personal data as described above please email [marketing@wcs.ac.uk](mailto:marketing@wcs.ac.uk).

## TO MEET OUR LEGAL OBLIGATIONS TO YOU AND TO OTHER ORGANISATIONS, WE WILL

- Help the emergency services (fire, police, ambulance) or a health professional to protect your vital interests or someone else's e.g. in a medical emergency;
- Submit statistical returns to the government or its agencies, including the Scottish Funding Council, and other official bodies, such as the Scottish Funding Council (SFC). This may include sensitive data for equality monitoring purposes. You can find a copy of the SFC data collection policy on their website;
- On request we will inform the Joint Information Systems Committee or other similar providers that you are a student, to allow you to participate in the use of JISC or other academic related software;
- Meet a statutory or regulatory obligation, e.g. a court order;
- Confirm fee payments you may make using our online payment service provider;
- Confirm your eligibility for tuition fee funding with agencies including the Student Awards Agency for Scotland, the Student Loans Company or your sponsor;
- Disclose the contact details of UK campus students who may be eligible to vote to the Electoral Registration Office, in order to contact them to encourage them to register to vote;
- Provide information to local councils for exemption of Council Tax (if you are in the UK);
- Comply with immigration laws. This involves disclosure and data sharing with UK Visas and Immigration;
- Provide limited information necessary to organisations with a statutory function, such as the police, where this is necessary for law enforcement.

## TO CONTACT YOU

We may contact you by telephone, email or post. In addition, the College has a system for contacting all students by text message (SMS) in the event of an emergency or urgent situation arising. We do not require your consent to do this and if we decide to use SMS for any other legitimate purposes we will inform you in advance where possible.

The College will use the email address it provides you with to keep you updated with College related information. Again we do not require your consent to do this.

## HOW LONG WE KEEP YOUR PERSONAL DATA

We keep information about you only for as long as needed to provide you with academic and support services and meet our legal obligations and rights. Almost all your personal data is destroyed securely 6 years after you leave the College. We keep a limited permanent record of your attendance, what you studied and your award so that we can verify this as needed and for archival purposes. More information about how long we keep your personal data and why can be found on the College website.

## YOUR RIGHTS

You have the right to:

- Find out what personal data we process about you, including more information about that processing, and to obtain a copy of the data, free of charge within one month of your request. We may make a charge for additional copies of the same information;
- Ask us to correct inaccurate or incomplete data.

If you think we are acting unfairly or unlawfully you can:

- Object to the way we are using your data;
- Complain to the UK Information Commissioner's Office.

Under certain conditions you also have the right to ask us to:

- Restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns;
- Erase your information or tell us to stop using it to make decisions about you;
- Comply with your wishes where you have previously agreed to us processing your data for a particular purpose and have withdrawn your consent to further processing; or
- Provide you with a portable electronic copy of data you've given us.



## DATA PROTECTION OFFICER AND CONTACT DETAILS

If you have any questions about what we do with your personal information or your rights under privacy laws, you can contact us in the following ways:

Data Protection Officer  
West College Scotland  
Paisley Campus  
Renfrew Road  
Paisley  
PA3 4DR

Phone: 0300 600 6060  
Email: [dpo@wcs.ac.uk](mailto:dpo@wcs.ac.uk)

## FIND OUT MORE ABOUT YOUR RIGHTS UNDER PRIVACY LAW

In our Data Protection Policy and our webpages:

<http://www.westcollegescotland.ac.uk/legal/privacy/>

On the website of the UK [Information Commissioner's Office](https://ico.org.uk/for-the-public/)

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