|  |  |  |
| --- | --- | --- |
|  | **CALLYWITH COLLEGE** |  |

**Privacy Notice - General Data Protection Regulation**

1. **Introduction**

The purpose of this notice is to tell you how Callywith College will process your personal data whilst you are a student at the College and thereafter for the time as is necessary for us to meet our legal obligations and responsibilities to you. This notice also tells you which third parties Callywith College may share your personal data with whilst you are with us and for the stated time during which we retain your records.

Callywith College is a data controller, registered with the Information Commissioner’s Office (ICO). We will only process your personal data in accordance with this Privacy Notice and in accordance with the General Data Protection Regulation, coming into force on 25th May 2018.

By application to, and acceptance of, a place to study at Callywith College, you are consenting to the College processing personal data (including Special Category Data), for the purposes set out in this notice and for other legitimate purposes connected with your enrolment, education and progression as a student of Callywith College.

Given the complexity and variety of the relationships that Callywith College has with its students, it is not possible to set out an exhaustive list of all the ways in which your personal data may be processed by the College. However, Callywith College takes it duties and responsibilities under the Legislation extremely seriously and will only keep your data for as long as necessary, bearing in mind the purposes for which your personal data is collected. Further information on how long Callywith College will keep your data is available on request in our Data Archive Storage and Disposal Policy.

This notice will be updated from time to time to ensure continued compliance with current legislation and to reflect best practice.

1. **Purpose**

Callywith College collects your personal data to enable us to fulfil our contractual obligations to you in the delivery of your studies. We collect it to fulfil legal obligations and regulatory duties that we owe to regulators, awarding bodies and other third parties.

Callywith College collects your personal data from the following sources:

* The information contained on your application form and provided on enrolment.
* Information provided by you whilst at Callywith College and in relation to your studies.
* Information collected during the use of the College’s Learning and Support Services.
* The information provided to Callywith College by a third party in relation to your admission/enrolment and subsequent study at Callywith College (for example information given by parents/carers or a reference provided by your previous school or employer).
* Information provided by the Home Office or other third party in relation to your status as a home or international student.
* Information provided by a third party in relation to your funding (for example the student loans company, employer or sponsor).
1. **Scope**

The type of personal data and special category data Callywith College may process about you includes, but is not limited to:

* Your name and your student number.
* Your student photograph.
* Your permanent and/or term time addresses.
* Your contact details (including email and other electronic identifiers).
* Your date of birth.
* Your nationality and your ethnic origin.
* Details regarding your next of kin and emergency contact details.
* Details of any other person you give permission for us to communicate with regarding your progress.
* Your academic record, including your qualifications on entry and your academic record whilst at Callywith College.
* Your attendance and performance tracking whilst at Callywith College (including any student disciplinary, suspension or exclusion information).
* Any disability, additional learning support needs (ALS) or medical information that has been provided to Callywith College.
* How your studies are funded.
1. **Compliance**

Processing of your personal data is necessary for:

* Performance of the contract in place between you and Callywith College for the administration and delivery of your studies.
* Performance of the contract between you and Callywith College to enable you to use College services (for example Student Support, Counselling or Learning Services).
* Compliance with any legal obligation imposed on Callywith College.
* Protecting the vital interests of you as a data subject or any other person.

Under the General Data Protection Regulation, you can request that such processing should not occur.  If you do not consent to the processing of your personal data, where it is required for the purpose of the administration of and delivery of your course, this may mean that you cannot continue as a student. This is because Callywith College would be ineligible for funding, unable to accredit your achievements or carry out delivery of education to you. In this instance, Callywith College would advise you of this for your consideration.

1. **Special Category Data**

Some of the personal data Callywith College processes about you will be Special Category Data. This type of personal data is subject to additional protections. Special Category Data is defined as information about your racial or ethnic origin, politics, religious or similar beliefs, trade union membership, physical or mental health or condition, sex life or sexual orientation, biometrics or genetics. Processing is necessary for the College to carry out its obligations in the fields of employment, social security and social protection laws.

1. **Criminal Offence Data**

Criminal Offence Data applies to personal data relating to criminal allegations, proceedings or convictions, including personal data linked or related to security measures. Callywith College will only request or process criminal offence data where we have a lawful basis to do so, generally related to the safeguarding of young people and vulnerable adults.

1. **Third Party Processors**

Given the variety of the relationships that Callywith College has with its students, it is not possible to set out an exhaustive list of all the ways in which your personal data may be processed by a partner organisation to provide services on your behalf.

Most commonly, the following third party processors access limited information to provide the following services:

* Callywith College uses the **Truro & Penwith College** Management Information System.

Their privacy notice is located at <https://www.truro-penwith.ac.uk/get-in-touch/preferences-centre>

* Our Management Information System (MIS), which records all student personal data under the title **UnitE,** is provided by Capita

Their Privacy Notice is located at <https://www.capita-fhe.co.uk/privacy-notice>

* Our Learning Resource Center services are supported by IS Oxford Software under the title **Heritage Cirqa Library Management System.**

Their Privacy Notice is located at <https://isoxford.com/gdpr>

* Our **Examinations Team** share data with a number of examination boards which include, but not necessarily limited to:

**AQA**

<http://www.aqa.org.uk/about-us/privacy-notice>

**OCR**

<http://www.ocr.org.uk/about/our-policies/website-policies/privacy-policy/>

**Pearson / Edexcel**

<https://www.pearson.com/uk/pearson-privacy/policy/privacy-policy>

**Eduqas**

<http://www.eduqas.co.uk/about-us/policies/privacy-policy/index.html>

 **AIM Awards**

 <https://www.aimawards.org.uk/privacy/>

 **UAL**

<http://www.arts.ac.uk/privacy-information/>

* To support students future progression data is processed by **Next Steps South West**

Their Privacy Notice is located via <https://nextstepssw.ac.uk/privacy>

* Some of our Curriculum Teams use **Turnitin** to submit and evaluate student work and associated sources

Their Privacy Notice can be found at <https://guides.turnitin.com/Privacy_and_Security>

1. **Use of your Personal Data**

We will use your personal data in the following ways. The list is not exhaustive, but intended to provide an idea of the things that we may need to do throughout your programme of study at Callywith College.

* The administration and delivery of your studies (teaching, learning, research etc.) including the delivery of teaching, administration of exams, the issue of your results, the recording of academic and other relevant achievements (which may include extra-curricular activities).
* We collect and hold data about your attendance, your achievements, your performance and your engagement with Callywith College systems.
* We may share this information with third parties including former or future education establishments, employers or sponsors directly relevant to your personal circumstances.
* Medical certificates, Educational and Health Care Plans (EHCP) and Additional Learning Support (ALS) details supplied to the College will remain on your student record throughout your programme of study and retained for seven years after completion of study. These may be used in applications for mitigating circumstances, examination concessions or to determine and apply for appropriate additional internal and external support.
* Information concerning your physical or mental health may be shared with selected Callywith College staff so that a proper level of care and facilities may be provided. It will only be shared with people who need to know this information to support you. Student Services (Support and Transition) will contact all students declaring a learning need or disability to discuss confidentially, all available help.

In addition, we may use this sensitive personal data to meet government requirements, to monitor our equal opportunities policies and to ensure that under-represented groups receive appropriate support.  We may also collect and retain this information for statistical purposes in an anonymised format.

1. **Data Sharing Arrangements**

In processing your personal data and/ or special category data, Callywith College may have reason to share this with a third party. Some of these circumstances are as follows:

* If you are studying under one of our educational partnership agreements, (e.g. Truro & Penwith College), involved in exchange visits or work experience placements, we will release personal data to these institutions or related organisations as required to facilitate your studies or placement.
* In exceptional circumstances where we are concerned about your safety/wellbeing or consider you to be a risk to yourself or others we may share limited information both internally and with relevant third parties (for example Ambulance, Police, the Child and Adolescent Mental Health Services (CAMHS), the Multi-Agency Referral unit (MARU) or NHS trust) to ensure appropriate support is available.
* We will disclose limited information in connection with your academic progress to employers, sponsors, loan organisations and Scholarship schemes to enable such organisations to establish eligibility for the sponsorship/loan/award.
* International students should be aware that personal information including information about your enrolment, attendance and progress at this establishment may be passed to the Home Office for purposes connected with immigration.
* Should you fall into arrears of payment to Callywith College (for example, course fees, we may disclose your personal data to a third party (e.g. solicitors, debt recovery agents, Courts) to help pursue and recover the debt.
* We may disclose details of full-time registered students to the relevant Council so that liability for Council Tax may be established.
* Information relating to your attendance record may be disclosed within a reference to a relevant third party legitimately requesting such information.
* Certain, limited personal data may be sent to Government Education Departments, Funding Councils, Student Loan Company, and registration bodies, and local authorities and emergency services for legitimate purposes. Callywith College may also invite you to participate in surveys.
1. **Data Retention and Archiving**

On conclusion of your studies, Callywith College will retain a certain amount of personal data, which will form part of the student records archive.  We retain this data in order to provide a record of your registration as a student and your achievements at College, to allow Callywith College to respond to requests for information from funding agencies or supply employer requests. Some anonymised information may be retained for longer periods for statistical purposes.

On completion of your course at Callywith College, you will automatically become a member of our Alumni. We will transfer limited personal contact data from your student record to **Think Alumni** who may contact you from time to time with items, which may be of interest to you or to update your destination data.

1. **Your Right to Access your Personal Data**

You have a number of rights in relation to your personal data. Information about what these rights are and how to exercise them is available in our Data Subject Access Policy and Procedure.

Callywith College will be transparent about its processing of your personal data. However, should you have any queries; further information may be obtained from the Data Protection Lead (Principal).

If you think that any of your personal data held by Callywith College is incorrect (for example if you move address and Callywith College has your old address), please let us know so that we can update our records accordingly.

You have the right to complain to the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk/)) if you have any concerns in respect of the handling of your personal data by Callywith College which we are unable to resolve.

1. **Policy Review Frequency**

Callywith College takes it duties and responsibilities under the Legislation extremely seriously and will only keep your data for as long as necessary, bearing in mind the purposes for which we have collected your personal data.

Information on how long Callywith College will keep your data is available on the Data Archive Storage and Disposal Policy.

This notice will be reviewed annually and when changes dictate. Callywith College will monitor its performance, to ensure continued compliance with current legislation and to reflect best practice.