



Glasgow
Kelvin
College

Student Privacy Notice



PRIVACY NOTICE

In line with the Data Protection Act 2018, the UK General Data Protection Regulation and associated Codes of Practice, Glasgow Kelvin College, as Data Controller, is required to advise students about the use of personal data or information, including sensitive personal information (special data), which they are asked to provide. This information may be used during enrolment on any College course and after such a course has been completed.

Data Protection Registration

Glasgow Kelvin College is registered with the Information Commissioner's Officer (ICO) as a Data Controller. Our registration number is **Z6805161**.

Personal Data

The Data Protection Act 2018 and the UK General Data Protection Regulation defines Personal Data as data that relates to a living individual who can be identified:

- (a) from those data; or
- (b) from those data and other information which is in the possession of, or likely to come into the possession of, the data controller.

It also includes any expression of opinion about an individual, any indication of the intentions of the data controller or any other person in respect of an individual. Personal data will therefore include basic details such as name, address, telephone number, NI number, date of birth, Internet Protocol (IP) address, MAC address and information about an individual's use of our information and communications systems (it should be noted that location data can be harvested using IP addresses and personal device manufacturer /model using MAC addresses), phone call data when using College phones and CCTV footage.

Special Data

Under the Data Protection Act 2018 and the UK General Data Protection Regulation certain data are classified under the Act as Special Data i.e.: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health and data concerning a natural person's sex life or sexual orientation

How the College Uses Your Personal Information

Glasgow Kelvin College employees will process your data (that means collect, store, use and destroy the information provided) in a manner that is compatible with the data protection principles. In some instances, the law sets the length of time information has to be kept, but in most cases the College, will comply with its own Document Retention Schedule. This can be obtained from the College.

The College's aim is not to be intrusive. It undertakes not to ask irrelevant or unnecessary questions. Moreover, the information provided will be subject to rigorous organisation/technical control measures and procedures to minimise the risk of unauthorised access or disclosure.

The College uses data gathered to enhance decision making and to shape services. There may be occasions when your personal information is sent outwith the European Economic Area (EEA) i.e. student exchange visits/curriculum excursions; in these circumstances we will ensure appropriate data share agreements are in place.

We will use your contact details to send you information relevant to your course of study, including but not limited to employment opportunities and progression or related courses that would support your learning journey offered by the College or its partners.

How long we keep personal information

The College will retain your personal data as long as necessary for the purposes described above. Please note that after completion of your studies the College may still require to hold your personal data for a period of time to satisfy statutory/legal obligations and/or to meet administrative requirements. Appropriate data will be retained permanently to ensure a record of your educational achievements is retained.

For further information, please contact GDPR at: gdpr@glasgowkelvin.ac.uk

Why Does the College Need to Collect, Process and Store Personal Data?

The College will only use your personal information when the law allows us to. Most commonly, your personal information will be used in the following circumstances:

1. Where we need to perform the contract we have entered with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest. We may also use your personal information in the following situations, which are likely to be rare:
 - Where we need to protect your interests (or someone else's
 - Where it is needed in the public interest.

The Personal Data and any Special Data about you will be used in connection with your enrolment, citizenship, participation in your programme and attendance as a student at Glasgow Kelvin College.

As aforementioned, Glasgow Kelvin College, in certain circumstances, is required to share certain personal and special data with other organisations. The College seeks to minimise this wherever possible.

These organisations are:

- Ardenglen Housing Association – [Sharing Information Ardenglen](#);
- Awarding bodies – [Sharing Information - Awarding Bodies](#);

- British Council – [Sharing Information British Council](#);
- Building Engineering Services Association – [Sharing Information BESA](#);
- Capita Unit-e – [Sharing Information Capita Unit-e](#);
- Central Government – [Sharing Information UK Parliament](#);
- City and Guilds – [Sharing Information City and Guilds](#);
- College Auditors;
- Colleges – [Sharing Information UK Colleges](#);
- Colleges Scotland – [Sharing Information Colleges Scotland](#);
- Debt Collection Agencies;
- Doodle – [Sharing Information Doodle](#);
- East Dunbartonshire Council – [Sharing Information East Dunbartonshire Council](#);
- East Renfrewshire Council – [Sharing Information East Renfrewshire Council](#);
- Easthall Park Housing Association Co-Op Ltd.- [Sharing Information Easthall Park](#);
- Electoral Registration Office – [Sharing Information Electoral Registration Office](#)
- ESOL Glasgow – [Sharing Information ESOL Glasgow](#);
- European Funding Authorities – [Sharing Information European Social Fund](#);
- Eventbrite – [Sharing Information Eventbrite](#);
- Falkirk Council – [Sharing Information Falkirk Council](#);
- Forth Valley College – [Forth Valley Sharing Information](#);
- Glasgow Caledonian University – [Sharing Information GCU](#);
- Glasgow City Council - [Sharing Information Glasgow City Council](#);
- Glasgow City Council - Electoral Registration Office – [sharing information GCC ERO](#)
- Glasgow City Council - Council Tax – [sharing information GCC CT](#)
- Glasgow City Council - Schools – [sharing information Schools](#)
- Glasgow Colleges Regional Board;
- Glasgow Life – [Sharing Information Glasgow Life](#);
- Home Office/UK - [Sharing Information Home Office](#);
- Jobs and Business Glasgow – [Sharing Information Jobs and Business Glasgow](#);
- Learn Smart (formerly BSmart);
- Learning Centre Partners – [John Wheatley Learning Network](#);
- Local Authorities – [Sharing Information - Local Authorities](#);
- Mailchimp – [Sharing Information Mailchimp](#);
- Moodle – [Sharing Information Moodle](#);
- North Lanarkshire Council – [Sharing Information North Lanarkshire Council](#);
- Pearson – [Sharing Information Pearson](#);
- Police Scotland and other law enforcement or regulatory bodies - [Sharing Information](#);
- Renfrewshire Council – [Sharing Information Renfrewshire Council](#);
- Regulatory bodies;
- Remit Group – [Sharing Information Remit](#);
- Schools – [Sharing Information Glasgow Schools](#);
- Scottish Electrical Charitable Training Trust;
- Scottish Funding Council - [Sharing Information - Scottish Funding Council](#);
- Scottish Motor Trade Association – [Sharing Information SMTA](#);
- Scottish Public Service Ombudsman – [Sharing Information SPSO](#);
- Scottish Qualifications Authority – [Sharing Information SQA](#);
- Sector Skills Agencies – [Sharing Information - Sector Skills Agencies](#) ;
- Skills Development Scotland (SDS) – [Sharing Information SDS](#);

- SNIPEF – [Sharing Information SNIPEF](#);
- Software System Providers;
- South Lanarkshire Council – [Sharing Information South Lanarkshire Council](#);
- Streetwise – [Sharing Information Streetwise](#);
- Student Loans Company – [Sharing Information Student Loans Company](#);
- Students Awards Agency for Scotland (SAAS) – [Sharing Information SAAS](#);
- Survey Monkey – [Sharing Information Survey Monkey](#);
- UK/Scottish Government/government agencies/public bodies;
- Universities – [Sharing Information UK Universities](#);
- University of Strathclyde – [Sharing information University of Strathclyde](#);
- Young Enterprise Scotland – [Sharing Information YES](#);
- Your employer(s).

Equality and Diversity

Glasgow Kelvin College is committed to equality and diversity. In order to monitor the operation of its equality policies and schemes it is necessary to collect certain key information for the purposes of monitoring. The information relating to equalities is aggregated and published on an annual basis in the College's Mainstreaming Report.

CCTV

The College operates CCTV in various locations throughout the campus. This is done in accordance with data protection legislation and in line with best practice guidance from the Information Commissioner's Office (ICO). Website: www.ico.org.uk

Photographs

The College buildings and grounds are public spaces and, as such, whilst photographing events, images of individuals may be captured. The College reserves the right to use such photos for social media purposes. Where photos are being taken specifically for marketing purposes this will be made clear to individuals and appropriate consent obtained.

Cookies

Cookies are text files placed on computers to collect standard internet log information. This information is used to track use of the website and related activity.

Surveys

Periodically, we will conduct surveys to gather information related to Learning and Teaching at the College. When we ask you to complete a survey, the legal basis for processing the information you return is "contract" i.e. the contract you have as a student with the College as a provider of learning and teaching.

Studying from home and accessing the College web systems

When studying from home or another location outside the College, you are able to access the College web systems remotely. When you first register with the College web system, you will create an account with a username and a password. In the event that you have to reset your password, you can do this using the “Self-Service Password Reset” (SSPR) procedure. To use this system, you will be asked to register either a personal mobile number or a personal email address (not your college address) when you login for the first time. This registration process ensures that you are the account owner before you can change the account password. The phone number or email address you use to register for SSPR will be held by the College in Microsoft’s secure cloud for the duration of your studies. Under Data Protection legislation, the legal basis for processing this information is “contract” i.e. the contract you have as a student with the College as a provider of learning and teaching.

Recording Learning, Assessments and Discussions

As a result of the current pandemic, the College has moved much of its learning online. This is likely to continue with the introduction of ‘blended learning’; a combination of in-person and online learning.

Only lectures, tutorials and group discussions for learning purposes should be recorded. Personal data may be processed during these sessions, but this should be limited. One-to-one meetings (professional discussion) and other formal assessments can be recorded for assessment evidence purposes in-line with Awarding Body requirements. *However*, one-to-one meetings which are not for learning or assessment purposes should NOT be recorded.

- Lecturing staff will be open and transparent that the recording will take place;
- You will be given the opportunity to agree or decline to participate in the recording;
- If you do not need to participate in two-way conversations or group discussions, you should be removed from the recording by muting the microphone and switching the camera off.
- Similarly, text chat or ‘conversations’ can be switched-off or anonymised where possible.
- If any participant raises any objections when informed of a recording taking place, lecturing staff should explain why the recording is happening and offer the option to limit the personal data which may be captured by switching-off the microphone and camera.

Further guidance on this matter is available separately if required. Contact: gdpr@glasgowkelvin.ac.uk

Coronavirus (COVID-19) - Track and Protect

Introduction

For the health and safety of students, staff and visitors in the College, we may record the name and contact details of everyone who enters the College to support NHS Scotland’s efforts in tackling COVID-19. This information will be used to enable NHS Scotland and their statutory partners to contact you should you have been in the College around the same time as someone who has tested positive for coronavirus.

Why do we need to collect this data?

As stated above, the purpose for which we may process your personal data is to assist with NHS Scotland's efforts in tackling the coronavirus (COVID-19) public health epidemic. This will involve the gathering and, when necessary, the sharing of information with NHS Scotland and their statutory partners. Your data will not be used for any other purpose.

In order to assist in the containment of the virus, we will only share your data when it is requested directly by NHS Scotland and/or their statutory partners. This will only be in the unlikely event there is a cluster of coronavirus cases linked to the College.

In cases such as above, we will use the data we already hold.

What is our lawful basis for collecting this data?

Under data protection law, GDPR Article 6(1), we have a number of lawful bases that allow us to collect and process personal information. In this case, the lawful basis for processing your data is 'legitimate interests'. Broadly speaking, 'legitimate interests' means that we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests. Our legitimate reason for processing your data is to assist with NHS Scotland's Test and Protect strategy in relation to the coronavirus public health epidemic. Before sharing any information, we will carefully consider and balance any potential impact on you and your rights.

How long will we retain the data?

The College will retain your personal data as long as necessary for the purposes described above.

All personal data will be held and disposed of in a safe and secure manner.

Face Coverings

Face coverings are now mandatory for staff and students when moving within campus buildings. Nevertheless, there are a number of people who, due to their underlying health conditions, will be exempt from wearing a face covering. In these circumstances, it will be necessary for this exemption to be indicated through the wearing of an exemption badge and/or lanyard. To confirm your exempt status, you will have to apply online to [Face Covering Exemption Card Scotland](#)

Lateral Flow Device at Home Testing Kit distribution

This privacy notice covers the processing of personal data of students by the College relating to the distribution of Lateral Flow Device (LFD) home testing kits.

Your information will be used for the following purposes:

Background

The Scottish Government (NHS Test and Protect), in partnership with the UK Department of Health and Social Care (DHSC), Local Authorities and NHS Scotland, is responsible for the overall delivery of COVID-19 Lateral Flow Device Testing (LFD) for staff and students in Scottish

Colleges. The testing of asymptomatic people can support education settings to identify positive cases, break chains of transmission and reduce risks associated with the spread of COVID-19.

The privacy notice for the full process is available here: [Coronavirus \(COVID-19\) testing: privacy information - GOV.UK \(www.gov.uk\)](#)

Scope

The College will only collect and use your information for the following purposes:

- Collecting and recording your name and the date you were provided with a Lateral Flow Device (LFD) at home testing kit by the College on a Test Kit Log.
- Sharing of the Test Kit Log with NHS (Scotland) in relation to the monitoring of take up of home testing kits.

The purpose of the processing is to identify positive cases of COVID-19 and reduce transmission to other people. The aim is to ensure the health and safety of all individuals who attend the College in any capacity. The College is required to record and report the number of home testing kits issued to staff and students to the DHSC to support the monitoring of uptake.

Our lawful basis for using the data is/are:

- Article 6 (1) (e) Use is necessary for performing a task in the public interest or under official authority vested in us.

The College does not collect any special category (sensitive) data about you for this process.

Taking part in the LFD testing is voluntary. If you choose to take part, you will be asked to complete a 'Consent to Participate Form'.

Any results from tests are entered directly into the Government portal by you. The College are not notified, nor do we have access to these results. Any positive tests should be reported according to the College accordingly.

Your data will, or may, be shared with the following recipients or categories of recipient:

Your data will only be shared with DHSC, NHS Scotland when they contact the College in relation to the distribution of LFD testing at home kits.

For further privacy information refer to:

- [Use of your data for COVID-19 Testing | Information Governance \(scot.nhs.uk\)](#)
- [Coronavirus \(COVID-19\): Testing in Scotland | NHS inform](#)
- [How the NHS handles your personal health information | NHS inform](#)

This process does not involve your data being sent outside of the UK.

The processing of your data does not involve automated decision making.

Your data will be retained for the following length of time:

The Test Kit Log and 'Consent to Participate form' will be kept for 12 months following the end of the lateral flow testing programme. Your information will then be destroyed securely in line with College procedures.

Marketing

We will only contact you with direct marketing material, for example about other products and services offered by the College, where you have provided consent to do so. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact: gdpr@glasgowkelvin.ac.uk

Rights/Access to Your Information

As a 'Data Subject' you have a number of rights under the Act. These include the right to:

- access the personal data the College holds about you
- have inaccurate data corrected
- prevent processing of information which may cause you harm or distress
- prevent unsolicited marketing
- prevent automated decision-making

If you wish further information, then please email or write to us at the following address:

gdpr@glasgowkelvin.ac.uk

Data Protection Officer

Glasgow Kelvin College, 123 Flemington Street, Springburn, Glasgow, G21 4TD.

Further information can also be found as follows:

Glasgow Kelvin Policies at <https://www.glasgowkelvin.ac.uk/policies-procedures/> or the UK Information Commissioner's Office website at <https://ico.org.uk/>

Other Websites

Our website contains links to other websites; when you link to other websites you should read their privacy notice.

Changes to this Privacy Notice

The College reserves the right to update this privacy notice at any time, and a revised Privacy Notice will be made available when any substantial updates are made. The College may also notify individuals in other ways from time to time about the processing of their personal information.

Glasgow Kelvin College - Scottish Charity No. SC021207