



## St. David's Catholic Sixth Form College Privacy Notice

### Introduction

To meet the requirements of the Data Protection Act 2018 and General Data Protection Regulation (GDPR), schools and colleges are required to issue a Privacy Notice to students / Legal Parents and Guardians summarising the information held on record about children and young people, why it is held, and the third parties to whom it may be passed.

This Privacy Notice provides information about the collection and processing of children's or young people's personal and performance information by St. David's Catholic Sixth Form College (hereby referred to as St. David's).

### How your data will be used

St. David's processes your data on behalf of the Welsh Government, and to administer the education it provides to children and young people. For example:

- the provision of educational services to individuals
- monitoring and reporting on pupils'/children's educational progress
- the provision of appropriate welfare, pastoral care and health services
- the giving of support and guidance to children and young people, their parents and legal guardians
- the organisation of educational events and trips
- the planning and management of the school / college
- to aid teaching and learning
- provide accurate assessment, and to monitor and report on progress
- to satisfy legal obligations, including equal opportunities, safeguarding and equal opportunities
- to disclose information to external parties for safeguarding and duty of care purposes (medical practitioners and law enforcement agencies)
- to inform destination statistics (employment / further education)
- to identify plagiarism

- to provide references to employers or higher education institutions • to assist in the development of St. David's College teaching staff We do not store or transfer your data outside of the European Union
- Student Assistance Programme service

The Health Assured Student Assistance Programme service

The Health Assured support line is a separate service offered to students of St David's Catholic College. Health Assured provides a confidential service and the information you discuss with their helpline support workers is not routinely provided to the College unless your health, wellbeing or welfare is judged to be at imminent risk. In these circumstances and where the support worker thinks you need additional support they will seek your consent to share your name and information about their concerns with the [feelsafe@stdavidscollege.ac.uk](mailto:feelsafe@stdavidscollege.ac.uk) team so that they can provide you with further help. In some circumstances where you are not able to provide consent or where you refuse consent, Health Assured may still decide to share relevant information with the College where it is necessary to protect your or another person's vital interests. This approach is consistent with the College's Safeguarding Policy which you signed up to at registration.

### Where do we collect data from?

St. David's collects information about its students, and their parents or legal guardians during the application / enrolment process. St. David's also collects information at other key times during the academic year and may receive information from other organisations including:

- Other educational establishments
- Learner Registration Service
- Examination Boards
- Disclosure and Barring service (where required by the programme of study)
- Welsh Government
- Cardiff Local Authority
- From the learner, when they disclose personal data when accessing college services (e.g. counselling, Student Assistance Program Health Assured careers advice).

### What information do we collect?

St. David's only collects data as required to fulfil our educational delivery and support obligations. As well as the information provided to the Welsh Government (please see the section entitled Lifelong Learning Wales Record (LLWR) Privacy notice), we collect the following information:

- legal Parent / Guardian contact details
- mobile phone number

- email address
- details about children's and young people's immigration status
- a form of identification
- first language
- assessment / educational information
- studentship information
- finance / banking information (where necessary)
- personal preferences and interests
- information captured on security systems including CCTV and door access systems
- information on websites you have accessed whilst using the college systems (including wifi)
- Photographs / videos

As well as the above, St. David's records the following special category data:

- religion
- information on any Additional Learning Needs (formerly Special Educational Needs)
- information on attendance and studentship issues and any disciplinary action taken;
- information about the involvement of social services with individual children and young people where this is needed for the care of the learner
- medical information needed to keep children and young people safe while in the care of St. David's  
information provided to college safeguarding and wellbeing officers, needed to keep children and young people safe whilst in the care of St. David's

## Legal Basis

St. David's processes personal data under the below Lawful Basis

Stage	Lawful Basis
Processing enquiries and applications	Legitimate interest
Processing data in relation to a learners programme of study	Legitimate interest Contract
Disclosing personal data to external parties to meet statutory demands	Legal obligation
Disclosures to third parties to ensure the safety and wellbeing of learners or other parties	Vital interest
Collection or disclosing information in order to meet regulatory or statutory requirements	Public task
Filming of lessons to aid in development of teaching and learning	Public task
Processing of personal data (including photographs) for College lanyards	Legitimate Interest

## Organisations with which we may share personal information

Information held by St. David's may also be shared with other organisations when the law allows and providing all appropriate steps are taken to keep the information secure, for example:

- other education and training bodies, including schools, when children and young people are applying for courses or training, transferring schools or seeking guidance on opportunities
- central and local government for the planning and provision of educational services;
- social services and other health and welfare organisations where there is a need to share information to protect and support individual children and young people;
- management Information System (MIS) providers in order to ensure that system functionality and accuracy is maintained;
- the colleges approved suppliers of the schools 'cashless' system to ensure all pupils, parents & guardians with parental responsibility and school staff are able to use it as appropriate;
- the Central South Consortium Joint Education System (CSCJES) to support regional statistical analysis as required by Welsh Government;
- various regulatory bodies, such as ombudsmen and inspection authorities (ESTYN), where the law requires that information be passed on so that they can do their work;
- the Office of National Statistics (ONS) in order to improve the quality of migration and population statistics
- other parties, if required by law in connection with any legal proceedings
- higher education institutions & Universities and Colleges Admissions Service (UCAS)
- Careers Wales
- The Learner Registration Service for the collection of Unique Learner Numbers (ULN)
- Wales Essential Skills Toolkit (WEST)
- Student Finance Wales for the processing and payment of EMA
- Police or Security agencies for safeguarding and duty of care purposes
- Turnitin to aid in the detection of plagiarism
- Internal auditors
- UK Border Agency (where appropriate)
- Iris Connect to aid in the development of Teaching and Learning practices of St. David's college staff.
- Health Assured Student Assistance Programme service
- Employers for the purposes of completing job reference requests
- Suppliers of subject specific software, to enable access to external systems

In all instances, the minimum information possible is always shared with external agencies

## Parents and Guardians

As per GDPR regulations, learners over the age of 16 may give consent for the processing of their personal information without input from Legal Parents or Guardians. St. David's believes that a

close relationship between the College, learners and Legal Parents or Guardians is beneficial to the successful completion of the programme of study and as such will contact Legal Parents or Guardians over concerns about a learners studentship.

Learners may withdraw consent for the college to communicate with Legal Parents or Guardians at any time.

## Security

St. David's, the Local Authority and Welsh Government place a high value on the importance of information security and have a number of procedures in place to minimise the possibility of a compromise in data security. We will endeavour to ensure that information is kept accurate at all times and processed in accordance with our legal requirements.

All St. David's staff have had compulsory training on the GDPR and their responsibilities in ensuring compliance.

## Retention Schedule

St. David's will only hold your personal data for an appropriate amount of time. Please refer to the college Record Retention Schedule for more information.

## Your Rights

The GDPR and Data Protection laws give individuals certain rights in respect of personal information held on them by any organisation. These rights include:

- the right to ask for and receive copies of the personal information held on yourself, although some information can sometimes be legitimately withheld;
- to rectify inaccuracies in the personal data that we hold about you
- to be forgotten – your details to be removed from systems that we use to process your personal data (in certain circumstances) the right, in some circumstances, to prevent the processing of personal information if doing so will cause damage or distress;
- to obtain a copy of your personal data in a commonly used electronic form • to object to certain processing of your personal data by us

You also have the right to ask the Information Commissioner, who enforces and oversees the Data Protection Act, to assess whether or not the processing of personal information is likely to comply with the provisions of our legislative responsibilities.

## Seeking further information

For further information about the personal information collected and its use, if you have concerns about the accuracy of personal information, or wish to exercise your rights under the Data Protection Act 2018 and General Data Protection Regulation, you should contact:

- St. David's Catholic Sixth Form College email: [dataprotection@stdavidscollege.ac.uk](mailto:dataprotection@stdavidscollege.ac.uk)
- Cardiff Council's Data Protection Officer at County Hall, Atlantic Wharf, Cardiff Bay, Cardiff, CF10 4UW email [SchoolsInformationManagement@cardiff.gov.uk](mailto:SchoolsInformationManagement@cardiff.gov.uk)
- Welsh Government's Data Protection Officer at the Welsh Government, Cathays Park, Cardiff, CF10 3NQ; email [Data.ProtectionOfficer@gov.wales](mailto:Data.ProtectionOfficer@gov.wales)
- The Information Commissioner's Office help line 029 2067 8400 (Wales helpline) or 0303 123 1113 (UK helpline)
- information is also available from [www.ico.gov.uk](http://www.ico.gov.uk)

### Notifications of changes

If any amendments are made to this privacy notice, you will be notified accordingly. The latest version of the privacy notice will be available on the college website - [www.stdavidscollege.ac.uk](http://www.stdavidscollege.ac.uk)

## Welsh Government / Lifelong Learning Wales (LLWR) Privacy notice

### Introduction

The learning programme you are about to enrol on / are enrolled on is funded either directly by the Welsh Government (WG) or part funded via the European Social Fund (ESF) approved operations (through the Welsh Government).

Your participation in the programme is dependent on you providing personal data. The legal basis we rely on to process your personal data is article 6(1)(e) of the General Data Protection Regulation. This allows us to meet our legal duties and administer and monitor the funding we provide. Where you provide special category information, such as ethnicity, this will be processed with your consent. A full list of special category data can be found in Part Two/Full Version of the privacy notice.

The Welsh Government will be the data controller for the personal information you provide.

If your programme is ESF funded, you will be asked by your learning provider to supply additional evidence such as a passport, recent payslip or qualification certificate. A copy of this evidence will be kept by your learning provider for ESF audit purposes, and a sample of learner evidence across providers will be sent to the Welsh Government.

## What will the Welsh Government use your information for?

The Welsh Government uses your data for funding, planning and policy development as well as monitoring learner outcomes (such as achievement of qualifications, learner progress and destinations).

Additionally, your data will be used in official statistics and research about post-16 learning, including how health and individual circumstances affect the educational outcomes of learners in Wales. Our official statistics reports give an overall picture of learners in Wales, what they study, their achievements and their destinations after they leave learning. They include, for example, information on patterns in learners' gender, ages, and the qualifications, subjects and levels they are studying. Individual learners cannot be identified in these publications.

Research organisations will also use post-16 learner data to evaluate Welsh education policies and programmes. As part of these evaluations, they may also conduct optional learner surveys, which will assess the impact of a programme on the individual learner as well as contribute to future Welsh Government policy development; for example, establishing how much apprentices are paid, which then contributes to developing a national minimum wage policy.

In order for the Welsh Government to evaluate the impact of its programmes on certain groups of learners, we will link your data with other educational records we hold, such as the Pupil Level Annual Schools Census, Welsh Examinations Database and Higher Education Statistics Authority. We use this linked data to help us understand the progress and outcomes of learners in Wales, to inform our research, performance measures and statistical publications. We may also share this linked data with researchers and with our partners, including Estyn and Qualifications Wales, to help them carry out their own data analysis to inform inspections and reviews. Individual learners cannot be identified in the linked data we share with our partners.

For a more detailed list of how your data is used, please refer to Part Two/Full Version of this privacy notice. This can be found here:

<https://gov.wales/sites/default/files/pdf-versions/2021/6/2/1623753529/lifelong-learning-wales-record-privacy-notice-v50-2021.pdf>

## Who the Welsh Government shares your data with and why?

Please go to the Part Two/Full Version of the privacy notice for a complete explanation of who we share your data with and why.

Your rights and choices under the General Data Protection Regulation (GDPR) include:

- access to the personal data the Welsh Government holds on you
- requiring the Welsh Government to rectify inaccuracies in that data
- objecting to processing on grounds relating to your particular situation (in some circumstances)
- restricting processing (in some circumstances)

- having your data erased (in certain circumstances)
- lodging a complaint with the Information Commissioner's office (ICO) who is the independent regulator for data protection

#### How long will the Welsh Government keep your data for?

Data Type	Data Retention Period	Data uses
Further Education and Adult Learning	Your data will be deleted after 10 years	This enables the Welsh Government to analyse learner data and create reports over a period of time. These reports will be used to help inform policy decisions or to forecast future funding. Where learning is ESF funded data is kept so that it can be checked and audited. The timescales for keeping data are decided by the European Union.

#### Contacts

For further information about the information which the Welsh Government holds and its use, or if you wish to exercise your rights under the GDPR, please write to us using the details below:

Data Protection Officer  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ  
Email: [dataprotectionofficer@gov.wales](mailto:dataprotectionofficer@gov.wales)

To contact the Information Commissioner's Office, please see details below:

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
029 2067 8400 (Wales helpline) or 0303 123 1113 (UK helpline)  
Website: <https://ico.org.uk/>

#### Notifications of changes

This Privacy notice was last updated in September 2021 and we keep it under regular review to make sure it is up to date and accurate. We will always notify you of changes to the use of your data



## St David's Student GDPR Privacy Notice V3 updated September 2021

via this Privacy notice and your provider. All of the Welsh Government's processing will comply with data protection legislation.

If you prefer not to supply your special category data at any time, you must contact your learning provider who will update your record.