

## **Student Privacy Notice**

### **Who we are and how to contact us**

South Hampshire College Group ("the College") is the data controller for the personal data described in this notice. This notice sets out how we use your personal information when you are enrolled as a learner with the College.

South Hampshire College Group is committed to protecting the privacy and security of your personal data. This privacy notice explains how we collect, use, and protect your personal data, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

If you have questions or wish to exercise your data rights, please contact our Data Protection Officer (DPO): The DPO Centre Email: [dp@shcg.ac.uk](mailto:dp@shcg.ac.uk)

### **1.0 Data Protection Principles**

We will comply with data protection law, which means that the personal data collected as a student will be:

- Used lawfully, fairly and in a transparent manner
- Collected only for valid purposes that are clearly explained to you, and not used in any way which is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes which we have told you about
- Kept securely

### **What personal data we collect**

During application, enrolment, study and after you leave, we may collect and process the following categories of personal data:

- Identification and contact details: name, date of birth, unique learner number (ULN), postal address, email, phone numbers, photo ID, nationality and residency, any previous addresses, emergency contact and next of kin information.
- Education history: prior qualifications and results, previous schools/colleges attended
- Employment details relevant to your course/apprenticeship. (where required)
- Special Educational Needs (SEN) information: copy of your EHCP, individual needs and provision, care plans and associated materials.
- Safeguarding information
- Course and progress data: programme(s) studied, attendance records, engagement, assessments & exams, results, progression, destination after college.
- Funding and eligibility data: household or DFE-required indicators (where applicable), fee/bursary information;

- IT and facilities data: College ID card photos, library/IT accounts, login records, network/internet use monitoring necessary to ensure safe, secure, lawful use of College systems.
- CCTV footage for safety and security.

### **Special Category Data**

There are certain types of more sensitive personal data which require a higher level of protection, known as special category personal data, which we collect and process. We currently collect and process the following special category data.

- Health data, including any disability information and/or additional support needs
- Race or ethnicity
- Religious or philosophical beliefs
- Sexual orientation

### **Criminal offence data**

As part of your engagement with the College, we may collect criminal offence data about yourself in certain circumstances. This may include:

- Information about spent or unspent criminal convictions and offences

We only process criminal offence data about our students where there is a statutory requirement or to prevent or detect unlawful acts.

### **How we obtain your data**

- Directly from you (through application and enrolment forms, learner record updates during the course of your study, engagement with support services).
- From third parties involved in FE services (e.g., Local Authorities, awarding bodies, social services), and in transition to College (e.g., records from your previous school/college).
- From your employer or workplace learning provider (where appropriate)
- From DfE systems related to the Individualised Learner Record (ILR) and funding.

### **Why we process your data**

- Provide and manage your education/training (teaching, assessment, support, placements, libraries, IT, facilities, payments systems & processing).
- Meet statutory and funding obligations (DfE ILR data collection and audit; public interest tasks; safeguarding; health & safety).
- Support your welfare (learning support, reasonable adjustments, pastoral care, safeguarding).
- Operate and secure our campus and systems (ID cards, access control, CCTV, cyber and network monitoring for security and lawful use).

- Conduct planning, quality assurance, surveys and research/statistics to improve services and demonstrate outcomes
- Conduct necessary background checks (eg. DBS/background checks for study related to a regulated profession or study or volunteering engagement in regulated activity)
- Communicate with you (course updates, progression, alumni engagement)
- marketing with your consent (events, newsletters, photography/video).
- For provision of support where you have disclosed information about your physical health, mental health and/or disability status. This includes the provision of reasonable adjustments and support through internal and external services;

### **Our lawful bases for processing**

We only process your personal data where data protection legislation permits us to do so. We rely on the following UK GDPR legal bases:

- Public task (Article 6(1)(e)) – to provide education and training and fulfil our public functions.
- Legal obligation (Article 6(1)(c)) – to comply with laws and regulations (e.g., DFE/DfE requirements, safeguarding, health & safety).
- Consent (Article 6(1)(a)) – e.g., for optional marketing communications and use of photography/video where not otherwise necessary.

Where we rely on your consent for processing data, you can withdraw this consent at any time. If you wish to do so, please contact the DPO.

For special category data, we primarily rely on

- Article 9(2)(g) – substantial public interest
- Article 9(2)(h) - health/social care

### **Data Sharing: Who we share your information with**

We only share data where necessary, lawful, and proportionate. This may include sharing with the following organisations:

- Relevant Government departments (Department for Education, Education and Skills Funding Agency, National Pupil Database)
- Regulators eg. Ofsted
- Local Authorities and other statutory bodies.
- Awarding organisations and examination bodies
- Police and law enforcement agencies
- Careers services and training providers
- Apprenticeship/employer partners (for workplace learning).
- Third party service providers engaged to support the operations of the college(e.g., IT platforms, payment processors, student management systems)

## **International transfers**

If we use services that transfer data outside the UK, we ensure appropriate safeguards (e.g., adequacy decisions or standard contractual clauses) and assess vendor compliance before any transfer.

## **11.0 Security of Your Data**

We have implemented appropriate technical and organisational measures to protect your personal data from accidental or unlawful destruction, loss, alteration, or unauthorised disclosure. In addition, we limit access to your personal data to those trusted third parties who have a business need to know.

### **Data Retention - How long we keep your data**

We keep data only for as long as necessary for the purposes above and in line with our internal retention schedule and applicable funding/audit requirements.

Some records may be kept longer if required for safeguarding, statutory reasons, by law or to establish/defend legal claims.

### **Children, parents and guardians**

For learners under 18 (or where legally appropriate), we may contact parents/guardians about progress, attendance, welfare or financial support matters. We do this lawfully and proportionately, respecting your rights and safeguarding obligations.

### **Your data protection rights**

Under UK GDPR and the Data Protection Act 2018, you have the following rights:

- Access your personal data
- Rectify inaccurate or incomplete information
- Erase data (in certain circumstances)
- Restrict processing
- Object to processing based on legitimate interests
- Data portability (where applicable)

To exercise these rights, please contact the DPO and or the Individual Rights procedure.

## **Contact**

If you have questions or wish to exercise your data rights, please contact our Data Protection Officer (DPO) via the DPO Centre Email: [dp@shcg.ac.uk](mailto:dp@shcg.ac.uk)

### **Concerns or complaints**

If you are concerned about how we handle your personal data, please contact the College in the first instance so we can try to resolve your concern. If you remain dissatisfied, you can complain to the ICO:

Online: [ico.org.uk/make-a-complain](https://ico.org.uk/make-a-complain)

Helpline: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF