

Privacy Notice	 THE TRAFFORD COLLEGE GROUP
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Responsible Manager:	Director of MIS	Date:	March 2019
Approved by:	GDPR Steering Group	Approval Date:	April 2019
GDPR Lead:	Corporation Secretary/ Group DPO	Review Date:	April 2020

Accessible to Clients/ Students:	Yes
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1. Applicability to Organisation

The Privacy Notice applies to: - The Trafford College Group

2. Scope and Purpose

Under data protection legislation, individuals (data subjects) have the right to request that a data controller provides them with the following:

- Confirmation that their personal data is being processed
- Access to their personal data
- Other supplementary information about the processing of their personal data.

You can make a request to see any personal information that's held about you by Trafford College Group.

3. Approach

The Privacy Notice sets out the process and timescales for which personal information will be supplied.

4. Linked Policies

Data Protection Policy

5. Linked Procedures

Information Security Procedures

6. Equal Opportunities Statement

No impact on equality has been identified.

7. Location and Access

The Privacy Notice is located as follows:

TCG website Guide to Information: Our policies & procedures
TCG intranet Group Policies and Procedures

8. Person Responsible for the Privacy Notice Document

Data Protection Officer (DPO)

9. Variations

There are no variations to the Privacy Notice.

Trafford College Group Privacy Notice

Trafford College Group is the data controller of personal information about you. We are responsible for the personal data that you provide to us. We have strict policies and processes in place to ensure that it remains safe whilst in our possession.

Registration details with Information Commissioners Office (ICO)

Organisation name: The Trafford College Group

Registration reference: ZA394464

Registered Address:

Manchester Road, West Timperley, Altrincham WA14 5PQ .

Our Data Protection Officer is:

Barry Watson.

If you have any questions about this privacy notice or the ways in which we use your personal information, please contact our Data Protection Officer dpo@tcg.ac.uk

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

What rights do you have?

Under the GDPR, you have the following rights:

To be informed	This Privacy Notice provides the information you are entitled to receive
Access	Please contact us if you would like confirmation that your data is being processed and access to your personal data via a Subject Access Request (SAR). All SARs are free of charge, however, Trafford College group will charge a 'reasonable fee' if a request is manifestly unfounded or excessive, particularly if it's repetitive. The fee will be based on the administrative cost of providing the information.
Rectification	Please inform us of any data which you would like rectified and we will usually respond within a month of the request. We will pass on the changes to any third parties who need to change their records and let you know this has been done.
Erasure	You may exercise your right to have your personal data erased in a number of circumstances (e.g. if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent).
Restrict Processing	You can tell us that we can keep your data but must stop processing it, including preventing future mailings and communications. If possible we will inform any third parties to whom your data has been disclosed of your requirement.

Data Portability	You can request to have the personal data transmitted directly from one controller to another, where technically feasible. Data Subject Data Portability Request Form
To Object	We may stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling). We will stop processing your data for direct marketing if you tell us to. We will stop processing your data for purposes of research and statistics, if you object. Data Subject Data Processing Objection Request Form
Not to be subject to automated decision-making including profiling	We do not use any automated decision-making.

To exercise these rights please contact the Data Protection Officer at dpo@tcg.ac.uk

Why do we collect Personal Information?

The Group collects and processes personal data relating to individuals in order to deliver Programmes of Study, Apprenticeships, workforce development programmes and other services which meet specific needs for learners and employers.

The Group will only ask for as much information as needed to fulfil your enquiry, application, enrolment or financial support application and meet our legal obligations.

What personal information does the Group collect and what lawful reasons do we have to collect and process it?

The following are examples of the types of information collected, held and shared. This is not an exhaustive list but provides examples of information collected, held and shared to enable The Trafford College Group to provide its products and services to its customers and users.

Type of data	What lawful reason do we have to collect and process it?
Name, address, date of birth, national insurance number, residency, details of previous educational history, qualifications, pastimes and interests and employment. Equality, Diversity and Inclusion information for example gender, ethnicity, nationality. Characteristics (such as gender, age, ethnicity, first language, nationality, country of birth and free school meal eligibility) Details of learning difficulties or disabilities, or medical conditions, which could impact on learning or on the quality of service we provide. References from previous educational institutions or employers.	We need this data to fulfil our legal obligations to share with the DfE and other agencies, and to fulfil our public task of providing students and employers with the most appropriate learning opportunities and the best possible education, training and pastoral support to meet their goals. We also use this data to carry out our obligations to monitor and improve the way we carry out public tasks as an FE College. We will also process details of medical conditions if they are needed to protect the vital interests of yourself or other learners.
Contact details – address, phone numbers, emails	We need this data to fulfil our legal obligations to share with the DfE and other agencies. We also need it to communicate with our students and employers in order to carry out our public task to provide education

	<p>We will seek consent where we wish to use this information for other purposes such as marketing courses or surveys.</p> <p>These details are needed in order to administer the enquiry/application process, part of our public task as an FE College. We will also contact you with information about open days and other information which will be directly related to your enquiry or application. We will not send you any unrelated marketing information.</p>
<p>Attendance information, including sessions attended, absences, reasons for absence. Progress information including assessment details and marks. Details of tutor meetings, learning and behavioural targets and summaries. References, details of applications for jobs, courses at other educational institutions.</p>	<p>We need this data to fulfil our public task of providing students and employers with the most appropriate learning opportunities and the best possible education, training and pastoral support to meet their goals. We also use this data to carry out our obligations to monitor and improve the way we carry out public tasks as an FE College.</p>
<p>Record notes of interviews, any advice and guidance given and offers made, and your responses to offers.</p>	<p>These details are needed in order to administer the enquiry/application process to enable us to provide the best possible advice and guidance in order to carry out our public task as an FE College.</p>
<p>Criminal convictions which are relevant to safeguarding or the safety of others. All criminal convictions, and DBS checks for all students on courses such as Early Years or Social Work, where required by law in order to meet course requirements.</p>	<p>We will require criminal convictions to be disclosed where we deem this to be necessary in connection with the public task of ensuring the safety of our students</p> <p>For certain courses with safeguarding implications, convictions must be disclosed and DBS checks will be carried out. Certain convictions may lead to debarring an individual from a study programme and/or specific jobs roles within certain sectors for example Early Years and Social Work.</p>
<p>Contact details and names of parents/carers</p>	<p>For students aged under 18 on 1st September at the start of the academic year, and for those aged 18-25 with an Educational Health Care Plan, we will require contact details of a parent or carer to be used in emergencies.</p> <p>We strongly encourage students/applicants to provide details of parents/carers and to give us consent to share data with parents, including details of interviews and open days, and offers made, so we can support students/applicants.</p>
<p>Household details – including number in household, income and benefits claimed, and bank account details.</p>	<p>This will be required when the college is under a legal obligation to collect and share this information with the government or its agencies, or when it is required to assess eligibility for fee remission or bursaries in order for the college to fulfil its public task of providing education.</p> <p>Students who apply for financial support such as bursaries will be required to provide further details and evidence. This is required to meet our legal requirements to administer financial support fairly and to collect and retain evidence to support our decisions, and to enable us to administer payments.</p>

Photos and images	The Group will take photos of students, employers and any visitors which will be used to maintain security and to assist staff in carrying out their tasks. Photos or videos taken for marketing or education purposes will not be published without consent.
Employer data - The college will collect and store information relating to commercial business for example as part of Organisational Needs Analysis (ONA) to enable Trafford College Group to support the employer (employees) and the development of their workforce.	This information will be stored on Trafford College Groups Customer Relationship Management System (CRM) in order to carry out and performance manage the contract and for the purpose of our public task of providing education
We will also collect and store employer and employee names, roles and contact details	Employer and subcontract organisations bank details may be collected in order to make payments for the performance of and contract or legitimate interest.

Lawful basis for processing (as set out in Article 6 of the GDPR).

In summary:

- For processing enquiries, applications and enrolments to the Group the lawful basis is public task.
- For processing information relating to an individual's programme of study the lawful basis is public task and may also be linked to a contract.
- For gathering information about the destination of an individual once they have left the Group the lawful basis is public task.
- For contacting individuals who have completed a course at the Group the lawful basis is public task.
- For contacting individuals for marketing purposes the lawful basis is consent.

How is your personal information collected?

The Group typically collect personal and employer information about individuals through the information provided to us during the application, enrolment, enquiry and employer engagement process.

The Group may collect your personal/employer data in a number of ways, for example:

- From the information you provide to us when you interact with us for example when you express your interest in studying at/engaging with The Trafford College Group regarding our products and services.
- When you apply to study at Trafford College Group and complete enrolment forms via online and Student Services and when you complete other admissions processes and procedures.
- When you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns.
- When you apply for financial support to help with the costs of study through, Learner Support Funds and bursaries.
- When you apply for a loan (Higher Education or Advanced Learning Loan).
- In various other ways as you interact with the Trafford College Group.
- From third parties, for example from your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies.
- Employers who take a student on work experience or placement.
- Employers who employ an Apprentice.
- Referral Partners, for example if we have received your details as a referral from one of our partners we may be required by the referral partner to provide them with updates on; Attendance, Progress, Achievement/completion, Outcome/destination and Withdrawal.

How We Use the Information You Provide:

Your personal/employer information will be used for purposes relating to education, training, employment, general advice services, well-being and research.

Information Sharing and disclosure

The Group does not sell or rent personal information. Where there is a legitimate or lawful (including statutory) reason to do so, this may be disclosed personal data to third parties.

Organisations that the Trafford College Group may share information with include:

- Awarding Bodies (e.g. OCR, AQA, City and Guilds, Pearson, Edexcel, AAT)
- Auditors – internal and external
- Childcare providers to make payments on students behalf
- Companies House
- Debt recovery agencies
- Department for Education
- Education and Skills Funding Agency (ESFA)
- Employers/Sponsors (e.g. information on your attendance and progress where they are providing you with time off or paying your fees), prospective employers and your parents or guardians. For example the sharing of this information through Smart Assessor employer portal (on-line e-portfolio)
- End-point assessment organisations
- HMRC
- Individual and employer personal information is shared with government and European Social Fund (ESF) agencies who may contact you for research purposes in relation to public funded education and training programmes that you have undertaken or commissioned with Trafford College group
- Job Centre Plus
- Local Authorities
- Ofsted
- Office for Students (OfS)
- Placement providers
- Police
- Quality Assurance Agency (QAA)
- Schools
- Social Care providers
- Stakeholders
- Student Loans Company
- Sub-Contractors
- UCAS
- University partners (where you are registered as a student for a course delivered in partnership with us)
- Your apprenticeship applications will be shared with employers with your permission, this will include: CVs, interview records and achievement outcomes.
- Any other authorised third party to whom the College has a legal/contractual obligation to share personal data with.

* Please note that in emergency situations where the College deems it to be in your (or potentially a third party's) 'vital interests' the College may share your personal data, including sensitive personal data with relevant individuals/agencies, e.g. the Police.

Further information about use of and access to personal data, and details of organisations with whom the data is regularly shared are available at:

- Returns to the Learning Records Service (LRS) to obtain or update Unique Learner Number (ULN) and Personal Learning Records (PLR).

<https://www.gov.uk/government/publications/learning-records-service-the-plr-for-learners-and-parents>

Returns to the ESFA (an executive agency of the Department for Education – DfE) for funding (ILR funding returns) and other statistical purposes.

<https://www.gov.uk/government/publications/esfa-privacy-notice/education-and-skills-funding-agency-privacy-notice-may-2018>

- Student Loans Company for the administration of your loan and for the management of associated issues or investigations (for example requests relating to enrolment, periods of attendance).
<http://www.slc.co.uk/>
- OfS and Ipsos Mori for the National Student Survey (NSS).

<https://www.officeforstudents.org.uk/media/322ca30d-0e2e-4124-a0fe-105450692eb3/nss-privacy-statement.pdf>

- Higher Education Statistics Agency (HESA) for statistical returns and for the “Destinations of Leavers from Higher Education” Graduate Outcomes Survey.

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>

Special Categories of Information:

The Group will ask you to provide information relating to ethnicity and any health or additional learning needs. This information is used to ensure that we meet our obligations under the Equality Act 2010. The Group also use any information provided to us about health or additional learning needs to ensure that we provide support to our learners as required during the application and enrolment processes and throughout their time with us at the college.

Marketing:

If you register an interest with the Group or through one of our service providers, you may be asked to opt-in to receive marketing communications. This is done at the point where your personal/employer information is first collected. Within any marketing communications, you will be provided with a simple and transparent way to unsubscribe. Any changes you request to how your personal information is processed for the purposes of marketing and/or the provision of service updates will be acted on promptly.

You can make this request by emailing dpo@tcg.ac.uk

Retention - how long we keep your information:

We will only retain your personal/employer information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements

How we transfer your personal information outside Europe:

The Group will not transfer your data outside of the European Economic Area.

CCTV:

The Campuses and buildings contain Closed Circuit Television systems. These are in place for the safety and security of our staff, students, visitors and property. We store images on our CCTV systems for 11 days. We may be required to securely store captured images for longer to support investigations.

Security:

The Group will hold personal information securely. To prevent unauthorised disclosure or access to personal information, it has strong organisational and technical security safeguards. The Group follows stringent procedures to ensure it processes all personal information in line with the Data Protection Act 2018.

Visitors to the website

When someone visits www.tcg.ac.uk the College collect standard internet log information and visitor details of behaviour patterns. It does this to find out things such as the number of visitors to the different parts of the site. It collects the information in a way which does not identify anyone.

Use of Cookies:

A cookie is a small file placed on a computer's hard drive. It enables the Group's website to identify a computer as individual's views different pages on its website. Cookies allow websites and applications to store preferences in order to present content, options or functions that are specific to individuals. They also enable the College to see information like how many people use the website and what pages they tend to visit.

All cookies used by this website are used in accordance with the current Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011. Cookies do not provide the Group with access to an individuals' computer or any information about them, other than that which they choose to share. Individuals can use their web browser's cookie settings to determine how the Group's website uses cookies. If you do not want the Group website to store cookies on your computer or device you should set your web browser to refuse cookies. However, please note that doing this may affect how the Group's website functions. Some pages and services may become unavailable to you. Unless an individual has changed their browser to refuse cookies, the Group's website will issue cookies when it is visited.

Use of the Group's computers:

Student and visitor usage of the Group's equipment and computers and what websites you go on when you are browsing the internet at College are monitored. This is because we have legal obligations to protect you, and we also have a legitimate interest in making sure you are using our computer equipment correctly and that you are not looking at any inappropriate content. If you want to browse the internet privately, you will need to use your own devices which are not linked to the Group's network or internet connection.

Who can I complain to?

If you are dissatisfied with the way that the Trafford College Group has processed your data or if you feel that we have not complied with your data protection rights, you can complain to the Data Protection Officer in the first instance dpo@tcg.ac.uk so that the Group is provided with the opportunity to review the matter and respond to your concerns.

You can also ask the Information Commissioner's Office (ICO) to carry out an assessment to see whether it is likely or unlikely that the Group has responded properly.

The ICO can be contacted via the following methods:
ICO helpline (Monday-Friday 09:00-17:00) Telephone: 0303 123 1113

You can **chat online with an advisor**.

You can visit their website for information on **how to make a data protection complaint**.

You can also write to the ICO at:

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

Changes to This Privacy Notice:

The Group will keep this Privacy Notice under regular review and reserve the right to change it as necessary from time-to-time or if required by law. Any changes will be immediately posted on the website.