

## PRIVACY NOTICE

In this notice, the terms "Cardiff and Vale College" and "the College" refer to the activities of Cardiff and Vale College and its subsidiary companies Element Skills Training Limited, CF10 Retail Limited, ICAT Limited and South East Wales City Region ATA Limited. This notice does not apply to ACT Training, who have issued a separate privacy notice.

This Privacy Notice describes what Cardiff and Vale College does with the personal information you provide it with.

It applies to information the College collects about:

- Visitors to the College's websites
- People who use or may use the College's services. This includes for example:
  - Individuals who undertake a course of study through the College
  - Cardiff and Vale College Alumni
  - Employers who purchase training from the College
  - Employers who take a learner on work experience or placement
  - Employers who employ an Apprentice
  - Members of the College workforce
  - College Governors
  - Individuals who are customers of the College's business operations
- Individuals who request information from the College.

If you are asked to provide personal information to us, it will only be used in the ways described in this Privacy Notice.

If you have any questions about this policy, please contact the Evan Davies, Data Protection Officer [dataprotection@cavc.ac.uk](mailto:dataprotection@cavc.ac.uk).

The categories of the information that the College collects, holds and shares includes, but is not limited to:

- Personal information (such as name, learner number, address, date of birth, national insurance number).
- Contact information (which may include phone number, email and postal address).
- Educational Information (including qualifications, predicted grades, learning support needs, attendance information – number of absences and reasons and individual achievements).
- Characteristics (such as gender, age and if the same as at birth, ethnicity, first language, nationality, country of birth and free school meal eligibility)
- Financial information (bank details).
- Information about personal preferences and interests.
- Company information, (financial, staff, professional development records).
- Website usage data.
- Staff contract information (start dates, hours worked, post, roles and salary information, annual leave entitlement, employment history and professional development).

Additionally, the College use CCTV at our buildings for the purposes of crime prevention, security and health and safety and, accordingly, will capture imagery of visitors to the College.

## How the College use this data

Your personal information will be used for purposes relating to education, training, employment, general advice services, well-being and research. The College may share non-sensitive personal information about you with other organisations as follows:

For our Welsh based learners: Most of the information is passed to the Welsh Government (including but not limited to the Department for Education and Skills) to meet funding arrangements.

For our English based learners: Most of the information is passed to Government agencies (including but not limited to the Education and Skills Funding Agency) to meet funding arrangements. Where necessary it is also shared with the Department for Education (DFE).

The information is used for the exercise of functions of these Government departments and to meet statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009. It is also used, in collaboration with the appropriate organisations, to create and maintain a unique learner number (ULN) and a Personal Learning Record (PLR), this allows the College to access any previous qualifications that are stored on the PLR for learners.

It is used by the College:

- To process applications, enrolments and workforce development programmes and contracts.
- For internal records so that the College can provide you with a high quality service.
- To contact individuals in response to a specific enquiry.
- To customise services so they work better for individuals.
- To contact individuals about services, products, offers and other things provided which may be relevant.
- To contact individuals via e-mail telephone or mail for research purposes.

At no time will the College assume permission to use information that is provided for anything other than the reasons stated here.

The information provided may be shared with other organisations for purposes of administration, the provision of career and other guidance and statistical and research purposes, relating to education, training, employment and safeguarding. This will only take place where the sharing is in compliance with the Data Protection Act 2018.

Individuals may be contacted after they have completed their programme of learning to establish whether they have entered employment or gone on to further training or education

Individuals may be contacted by the European Social Fund (ESF) Managing Authority, or its agents, to carry out research and evaluation to inform the effectiveness of the programme. Information may be passed to the ESF for this purpose.

The College does not store or transfer your personal data outside Europe.

The College has identified that a number of the lawful bases for processing data (as set out in Article 6 of the GDPR) are applicable. In summary:

- For processing enquiries and applications to the College the lawful basis is legitimate interest.
- For processing information relating to and individuals programme of study the lawful basis is legitimate interest and may also be linked to a contract.
- For gathering information about the destination of an individual once they have left the College the lawful basis is legitimate interest.

- For contacting individuals who have completed a course at the College the lawful basis is consent.

## **Security**

The College will hold personal information securely.

To prevent unauthorised disclosure or access to personal information, the College has strong organisational and technical security safeguards.

If information is shared with another organisation (reasons for this are given in the section below) the College will ensure an Information Sharing Agreement is in place.

The College follows stringent procedures to ensure it processes all personal information in line with the Data Protection Act 2018.

## **Information Sharing and Disclosure**

The College does not sell or rent personal information.

Information may, by necessity, be disclosed to appropriate staff members of the College and to government bodies (as previously outlined).

Organisations that the College may share personal information with includes:

- Awarding Bodies
- Companies House
- Welsh Government
- Department for Education and Skills
- Department for Education
- Learner Records Service
- Education and Skills Funding Agency
- Employers
- HMRC
- Higher Education Institutions
- Local authorities
- Mailchimp
- Estyn
- Pension Service
- Police
- Schools
- Sub-contractors
- UCAS
- MIAP

Information may be shared with third parties if it is in connection with the service being provided to individuals. For example, the College might share information with market research companies contracted to undertake work on its behalf to assess satisfaction with the College's service. When the College does this it will always ensure an Information Sharing Agreement is in place.

If, as part of the entry requirements for a course or if an individual is applying for a job with the College, the College needs to take up a reference or obtain 'disclosure' from the Disclosure and Barring Service, it will inform you beforehand.

Parental consent is not required. There may be exceptions in regards of learners with severe learning difficulties, school link learners and those who are otherwise unable to decide for themselves.

The College has found that it is very beneficial to the young person's progress as a learner if the College is able to engage with parents (or guardian/carer). Therefore, it is very important that the College have the parents' details recorded on its systems.

When a learner is in Further Education, parents/carers/guardians (or any other third party) are not automatically entitled to the learner's information. The College can only release information about its learners if it has their consent for this recorded on the College system.

Learners are asked for their consent to share information with parents/others on the enrolment form or when enrolling face-to-face. At any point, learners may withdraw or alter their consent the same way in which they gave it.

### **How long does the College keep data?**

In general the College will hold most of your personal data for the duration of your engagement with the College. The periods for which your personal data is held during and after the end of engagement are set out in our retention periods document which can be found on the College Website.

### **Visitors to website**

When someone visits any of the College's websites the College collects standard internet log information and visitor details of behaviour patterns. The College does this to find out things such as the number of visitors to different parts of the site. The College collects the information in a way which is not personally identifiable. If the College does want to collect personally identifiable information through its website, the College will be explicit in its intention and will make the purpose clear.

### **Use of Cookies**

A cookie is a small file placed on a computer's hard drive. A cookie enables the College's website to identify a computer as individuals view 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 College 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 College's website uses cookies. If an individual does not want the College's website to store cookies on their computer or device, they should set their web browser settings to refuse cookies. Please note that doing this may affect how the College's website functions. Some pages and services may become unavailable to the individual if cookies are disabled.

Unless an individual has changed their browser settings to refuse cookies, the College's websites will issue cookies when it is visited.

### **Controlling Information about Individuals**

When individuals fill in a form or provide their details on the College's website, there may be one or more tick boxes allowing them to:

- Opt in to receive marketing communications from the College by e-mail, telephone, text message or post.
- Opt in to receive marketing from third party partners by e-mail telephone, text message or post.

If individuals have agreed that the College can use their information for marketing purposes, they can change their mind easily, via one of these methods:

- Send an e-mail to: [dataprotection@cavc.ac.uk](mailto:dataprotection@cavc.ac.uk).
- Write to us: The Data Protection Officer, Cardiff and Vale College, City Centre Campus, Dumballs Road, Cardiff CF10 5FE
- Unsubscribe by clicking the link in each email

Any individual can request that the College delete their personal data. A request for erasure can be made by e-mailing the Data Protection Officer at [dataprotection@cavc.ac.uk](mailto:dataprotection@cavc.ac.uk). Whilst the Data Protection Act 2018 doesn't provide an absolute right to have your personal information deleted by an organisation (for example they do not need to delete personal information if they are obliged to keep it by law or have another legitimate reason to keep it) the College will review each request for erasure, and they will be assessed on a case by case basis.

### **Links from the College Website**

The College websites may contain links to other websites. Please note that the College has no control of websites outside of its main websites. If an individual provides information to a website to which the College links, the College is not responsible for its protection and privacy. Individuals are advised to read the privacy policy or statement of other websites prior to using them.

### **People who use the College services**

The College hold the details individuals provide in order to deliver programmes of study, Apprenticeships, workforce development programmes and other services which meet specific needs.

The College only uses these details to provide the service an individual has requested and for other closely related purposes. For example, the College might use information about people who have enquired about a course to carry out a survey to find out if they are happy with the level of service they have received, or the College might use information about an employer offering a learner work experience to contact them about a new Apprenticeship scheme or grant.

Information may, by necessity, be disclosed to appropriate staff members of the College and to government bodies (to fulfil the College's statutory responsibilities) such as the, Welsh Governments Department for Education and Skills, Estyn, and auditors or to local partners.

### **People who use the College's business enterprises**

If someone is a customer of a commercial service of the College e.g. The Classroom, Glamorgan Suite, Urbsba, the information an individual provides to the College to enable them to deliver that service will only be held and used for that purpose or for other closely related purposes.

### **People who request information from Cardiff and Vale College**

If an individual requests information from the College by letter, telephone, email, submitting an enquiry card or from a sales appointment, the College will make a record of that enquiry and will use the information to provide the individual with a response. The College will only use the information for these purposes and may provide a follow up survey to ensure that the College provided the individual with what they asked.

### **Accessing Your Own Personal Information**

Individuals have the right to ask for a copy of any of their personal information held by the College. They can make a 'subject access request' under the Data Protection Act 2018.

The easiest way to make a request is to email the Data Protection Officer at [dataprotection@cavc.ac.uk](mailto:dataprotection@cavc.ac.uk)

### **Requests to delete personal data**

One of the key principles which underpins the GDPR is the right of an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing. This is also known as the "Right to be forgotten".

The easiest way to make a request is to email the Data Protection Officer at: [dataprotection@cavc.ac.uk](mailto:dataprotection@cavc.ac.uk)

Any requests from individuals for any of the following should be made directly to the Data Protection Officer at: [dataprotection@cavc.ac.uk](mailto:dataprotection@cavc.ac.uk):

- Have inaccurate personal data rectified (right to rectification),
- Restrict or suppress of their personal data (right to restrict processing),
- Obtain and reuse their personal data for their own purposes across different services (right to data portability),
- Object to how their personal data is used,

### **Complaints or Queries**

If there are any questions about the College's collection and use of personal data, please contact the Data Protection Officer at [dataprotection@cavc.ac.uk](mailto:dataprotection@cavc.ac.uk). They are happy to provide additional information if it is required.

If you have a concern about the way the College has handled or is handling your personal information, or you wish to make a complaint because the College has not complied with our obligations, you can make a complaint to the Information Commissioner's Office (ICO). You should raise your concerns with within three months of your last meaningful contact with the College. Details of how to do this are on the Information Commissioners Office website: <https://ico.org.uk/concerns/handling>

By post: If your supporting evidence is in hard copy, you can print out the form and post it to the ICO (with your supporting evidence) to:

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

### **Changes to This Privacy Notice**

The College 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.