

Student Privacy Notice



Document Control Information

Reviewed by the Senior Management Team/HEFESTIS

July 2025

Date of Next Review:

March 2026

Approved by Senior Management Team

July 2025

The College reserves the right to amend this document at any time should the need arise following consultation with employee representatives. This Policy has been subject to an Equality Impact Assessment, which is published on our website: <https://www.glasgowkelvin.ac.uk/equality-diversity/>

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 category 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 Category Data

Under the Data Protection Act 2018 and the UK General Data Protection Regulation certain data are classified under the Act as Special Category 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 must 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 organisational and 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 UK i.e., student exchange visits/curriculum excursions; in these circumstances we will ensure appropriate safeguards 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 for the minimum period 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. This is in line with the College data retention schedule. 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 i.e. for teaching and learning.
2. Where we need to comply with a legal obligation.
3. Where it is needed for the performance of a task carried out in the public interest or in the exercise of official authority vested in the College.
4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where an individual's interests (or someone else's interests) need to be protected;
- Where it is needed in the public interest.

The Personal Data and any Special Category 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](#);
- Action for Children – [Sharing information Action for Children](#)
- Awarding bodies – [Sharing Information - Awarding Bodies](#);

- [Booksy – Sharing Information Booksy](#);
- 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](#);
- Cultureshift (Report & Support) – [Sharing information Cultureshift](#)
- 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](#)
- [Energy Skills Partnership – Sharing Information Energy Skills Partnership](#)
- 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 Life (Culture and Sport) – [Sharing Information Glasgow Life](#);
- GLOW (Education Scotland) – [Sharing Information GLOW](#);
- Home Office/UK - [Sharing Information Home Office](#);
- Jobs and Business Glasgow – [Sharing Information Jobs and Business Glasgow](#);
- Koha – [Sharing Information Koha/PTFS Europe](#);
- Learn Smart (formerly BSmart);
- Learning Centre Partners – [John Wheatley Learning Network](#);
- Local Authorities – [Sharing Information - Local Authorities](#);
- Moodle – [Sharing Information Moodle](#);
- North Lanarkshire Council – [Sharing Information North Lanarkshire Council](#);
- NHS Scotland – [Sharing Information NHS Scotland](#)
- 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](#);

- SMILE Counselling – [Sharing Information SMILE Counselling](#)
- 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](#);
- 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](#);
- Young Scot – [Sharing information Young Scot](#)
- 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. Only strictly necessary cookies are used on our website. You can provide consent for other cookies to be set on your device through the settings option on our cookie banner.

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

To support studying from home or another remote location you can register with the College web system. If you have to reset your password, you can do this using the "Self-Service Password

Reset” (SSPR) procedure. To protect your account, 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 ensures that you are the account owner, and the information will be held by the College for the duration of your studies. The lawful basis for processing this information is “contract” i.e., the contract you have as a student with the College.

Recording Learning, Assessments and Discussions

The College provides some of its learning online. ‘Blended learning’ is 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 is 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 your 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

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:

Right to Be Informed

You have the right to be clearly informed about the collection and use of your personal data. For example, educational institutions, such as the College, must provide a privacy notice explaining why and how your data is processed, who it is shared with, and how long it will be kept.

The obligation to provide privacy information to individuals will not apply if providing this information “is impossible or would involve disproportionate effort”. This is most likely to be particularly relevant where personal data has been gathered indirectly, i.e. not directly from the individuals.

Right of Access (Subject Access Request - SAR)

You can request access to the personal data the College holds about you, including information on why and how it is processed, and who has received it. Requests can be submitted verbally or in writing and must be responded to within one month without charging a fee (except in some exceptional cases). A Subject Access Request form can be found at the following link: [Subject Access Request Form](#)

Right to Rectification

If your personal data is inaccurate or incomplete, you have the right to request corrections. Institutions must update the data and inform any third parties who received the incorrect information where possible.

Right to Erasure (“Right to be Forgotten”)

You may ask to have your data erased if it is no longer necessary for its original purpose, if you withdraw your consent, or if the data has been unlawfully processed. However, this right is not absolute – data may be retained for legal or public interest reasons.

Right to Restrict Processing

You can ask to limit how your personal data is used, for example, while the accuracy is verified or if you dispute the data's use. During restriction, your data can only be stored but not further processed

Right to Data Portability

Where processing is based on consent or a contract, and uses automated means, you can request your data in a portable, machine-readable format to transfer it to another service.

Right to Object

The right to object refers to an individual's right to object to certain forms of data processing. This right was amended following the passing of the Data Use and Access Act 2025 (DUAA) on 19 June 2025. While it does not remove the 'right to object', it modifies how and when it can be exercised, particularly in the following areas:

Recognised Legitimate Interests:

The Act introduces a new category of "recognised legitimate interests" which allows organisations, such as the College, to process personal data without needing to conduct a balancing test against the individual's rights and freedoms.

Automated Decision-Making (ADM):

The DUAA expands the circumstances under which solely automated decisions with legal or similarly significant effects can be made. Individuals still retain the right to object and request human intervention, but the threshold for organisations to justify such processing has been lowered.

Scientific Research and Statistical Purposes:

The right to object is more limited when data is processed for scientific or statistical purposes, provided appropriate safeguards are in place.

Rights Related to Automated Decision-Making and Profiling

You have the right not to be subject to decisions based solely on automated processing, especially where the decisions have legal or significant effects on you. You can request human review or contest such decisions.

Right to complain

The Data Use and Access Act 2025 introduces a new right to complain. Individuals (data subjects) can submit complaints directly to the data controller, i.e. the College, if they believe their personal data has been mishandled. Complaints should be submitted via the Complaints email address at: Complaints@glasgowkelvin.ac.uk

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