



PRIVACY NOTICE POLICY

January 2022

Review Date: January 2025

Introduction

St Kevin's College (Data Controller) values the relationships with all students, staff and stakeholders and this notice explains how the College collects, processes and manages your personal data. The College will process all personal data in compliance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 for the purpose of providing you with a service you have requested and to meet our statutory obligations. We will never ask for information that is unnecessary to deliver this service. St Kevin's College is the Data Controller registered with the Information Commissioner Office (ICO) and is responsible under GDPR and Data Protection Act (2018) for the personal data that you submit to us.

The Data Protection Officer for the College is Gary Kelly.

Lawful Basis

As a school our main lawful bases for processing your personal data are as follows:

Article 6.1 (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes e.g. consent to contact next of kin, direct marketing, opting into a course/qualification.

Article 6.1 (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; e.g. staff employment contracts, contracts for a service by a third party (examination boards), student relationship with the College.

Article 6.1 (c) processing is necessary for compliance with a legal obligation to which the controller is subject; e.g. The Health and Safety at Work (Northern Ireland) Order 1978, The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, Disability Discrimination Act 1995, SENDO, Employment law.

Article 6.1 (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. On behalf of the Department of Education (DENI) our role is provide you with quality education. e.g. The Education (Northern Ireland) Order.

On occasions we may be required to process your personal data for other reasons however we will only do so where a Lawful Basis applies.

Information on Criminal Convictions

Where appropriate, the College is required collect information about criminal convictions as part of staff recruitment process or we may be notified of such information directly by you in the course of you working for us. As per the Safeguarding Vulnerable Groups (NI) Order 2007, Rehabilitation of Offenders Act 1974, Protection of Freedom Act 2012, there is a legitimacy in our field of work to ask for this.

The College lawful basis for processing this information is Schedule 1(18) of the Data Protection Act (2018) 'Safeguarding of children and of individuals at risk'.

Categories of Personal Data

Personal data and special category data captured may include:

- Name
- Date of birth
- Contact details
- Next of Kin
- Gender
- Marital Status
- Employment Status
- Residency
- Educational Background i.e. grades
- Disabilities, learning difficulties, long term medical conditions
- Vetting Information
- Photographic image for staff ID cards

Information may be obtained directly from the individual, or in some cases from a third party organisation involved in the services provided by the College that has obtained the information in the first instance (eg CCMS,EA & AccessNI).

All employees, students and visitors should have a reasonable expectation of being captured on CCTV on a daily basis.

While the use of CCTV is primarily for the following purposes, the College will regulate its use within the provisions of GDPR so as not to become intrusive (see GDPR CCTV policy):

- Deterring, prevention and detection of a crime including misuse/abuse of College equipment.
- Identification, apprehension and prosecution of offenders.
- Security of campus buildings and ground.
- Safeguarding/Health and Safety

In exceptional circumstances the images may be viewed for investigatory purposes. The College will only collect and process the necessary information required for these purposes, and without it the College may not be able to fulfil its obligations.

Purpose of Processing

The College holds the personal data and special category data of its students and staff in order to implement and manage all services and processes relating to students, including; student recruitment, admission, registration, teaching and learning (including attendance, progress and achievement), examination, graduation, collection and payment of monies and other services such

as student support and careers; and for staff, including; recruitment, staff development, payroll, contractual requirements, quality and improvement and staff related policies.

How do we Collect Personal Data?

We collect personal information about students and employees through the initial application/enrolment stages from you, internal departmental processes, manual forms, telephone calls and on-line systems, third parties e.g. School App.

Who will have access to my information, or who will you share it with?

We will share personal information with third parties where required to do so by law, where it is necessary to administer the working relationship with you or where there is a third party legitimate interest in doing so.

Information may be passed between various sections of the College for operational reasons and may also be disclosed to external agencies to which we have obligations, for example Government Agencies and associated Statutory Bodies (e.g. Department of Education), CCMS, Funding Bodies, Government Survey & Research Organisations, UCAS, Student Loans Company, Education Authority, Crime Prevention Agencies, Placement Providers, Examination Awarding Bodies, Social Welfare Organisations, Careers Service and potentially other such organisations for defined purposes. We may also disclose information to examining bodies, legal representatives. We require third party service providers to respect the security of your data and to treat it in accordance with the law.

Retention Period

We will only retain personal data for as long as necessary to fulfil the purpose we collected it for, for the purpose of satisfying any legal or reporting requirements. The College will retain records in line with the College Retention and Disposal Policy.

Exercising your Rights

You have the right to:

- To be informed about what we do with your information at point of data collection
- Access your personal data that we process;
- To rectify inaccuracies in personal data that we hold about you;
- In certain circumstances to be forgotten, that is your details to be removed from systems that we use to process your personal data;
- In certain circumstances to restrict the processing of your personal data;
- 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;
- To request that we stop sending you direct marketing communications;
- In certain circumstances to withdraw consent – (only where processing is based on consent);

For additional information on exercising your rights, please contact our Data Protection Officer (details below)

The Right to Lodge a Complaint

If you are not happy with how your information is being processed by the College, please contact the DPO:

Gary Kelly

Data Protection Officer

St Kevin's College

Brookeborough Rd

Lisnaskea

BT920LA

If you are dissatisfied with the College response, you have a right to complain to the Information Commissioners Office (ICO).

The ICO contact details are:

Information Commissioner's Office

Wycliffe House

Water Lane

Cheshire

SK9 5AF

Tel: 0303 123 1113 or 01625 545 745

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Automated decision making

The College will not use automated decision making to make decisions that will have significant impacts on data subjects.

Failure to provide personal information

If you fail to provide certain information when requested, we will not be able to fulfil our legal obligations or deliver the service you have requested.

Changes to this Privacy Notice

We reserve the right to update this privacy notice where there is a significant or unforeseen change to our processing activity. We will notify you of any updates to this notice.