

UWC ATLANTIC COLLEGE STUDENT AND PARENT/GUARDIAN PRIVACY NOTICE

Owner: Vice Principal (Operations and Administration)

ABOUT US

United World College of the Atlantic Limited (company number 00673076) is a company registered in England and Wales and is referred to as "UWC AC", "we", "our" or "us" in this privacy notice.

We see the provision of personal data as necessary to properly manage a student's educational experience at UWC AC and for the college to fulfil its obligations to all parties.

IMPORTANT INFORMATION

This Privacy Notice aims to give you information on how we collect and process the personal data of students and parents/guardians and is intended to ensure that personal information is dealt with in accordance with the General Data Protection Regulation (GDPR). It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal information will be aware of their duties and responsibilities by adhering to these guidelines.

This privacy notice covers:

- how we use data;
- what personal data we collect;
- how we ensure privacy is maintained; and
- legal rights relating to personal data.

WHY WE COLLECT AND USE PERSONAL DATA

The personal data collected is essential, in order for the college to fulfil their official functions and meet legal requirements.

We collect and use information to:

- support student learning
- monitor and report on student attainment progress
- provide appropriate pastoral care
- assess the quality of our services
- keep students safe (food allergies, or emergency contact details)
- meet the statutory duties placed upon us
- ensure appropriate allocation of funding and financial support

Under the General Data Protection Regulation (GDPR), data will be processed and retained for the purposes of allowing the student to make the best of their time at UWC AC. The college will therefore have a 'legitimate interest' for processing and retaining personal data and sensitive personal data. The data the college holds will be the minimum it requires to allow the student to thrive in their educational journey.

WHAT PERSONAL DATA WE COLLECT

The categories of information that we process include:

- personal identifiers, contacts and characteristics (such as name, unique student number, contact details and address)

- characteristics (such as ethnicity, language, financial background and scholarship funding)
- safeguarding information (such as court orders and professional involvement)
- educational needs (including support requirements)
- medical, welfare and administration (such as doctors information, health and dental, allergies, medication, dietary requirements and mental health information)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (examination results, effort and engagement grades, academic assessments and participation in other curricular and non-curricular activities)
- trips and activities (passport information)
- behavioural information (such as disciplinary records)
- admissions including means testing information (where applicable)
- images (including digital images for identification, photographs, CCTV for security purposes).

Sensitive personal data

Data protection law recognises that certain categories of personal information are more sensitive than others. This type of information is only collected where there is a clear reason for doing so.

HOW WE USE DATA

Collecting information

Personal data is essential for the colleges' operational use. We obtain the information the college requires from students and their parents/guardians. Additionally, information may also be received from the following sources:

- National Committees/International Office
- Admissions Forms
- Sponsors

Should we require sensitive personal information from other sources we will contact you.

Who we share information with

In undertaking college activities it is often necessary to share information with other parties. Where this is required, the college ensures that the data recipient adheres to adequate data protection requirements. Such instances could include:

- universities and other educational establishments
- visa/immigration authorities
- UWC National Committees
- other UWC Colleges
- UWC International Office
- medical/welfare professionals
- educational support services (such as regulatory inspectorates, Welsh government)
- approved service providers (such as caterers, travel, other activity/service providers)
- sponsors and donors

The college may also from time to time contact parents directly to provide updates on college initiatives and other key developments and also as part of any fundraising campaigns.

HOW WE PROTECT YOUR DATA

UWC AC is committed to keeping personal data safe and secure. This includes using a range of IT security measures, access controls, and internal policies setting out our data protection approach and associated training for employees.

We also have procedures in place to deal with any suspected data security breach. We will notify affected parties and any applicable regulator of a suspected data security breach where we are legally required to do so.

HOW LONG WE KEEP YOUR DATA

Your personal data will only be kept for as long as necessary in accordance with our data retention policy.

INDIVIDUAL RIGHTS UNDER THE GDPR

In addition to providing a legal basis for processing data, the GDPR provides the following rights for individuals:

1. The right to be informed

We will provide concise, transparent, intelligible and easily accessible information about the processing of personal data to individuals using this Privacy Notice.

2. The right of access

Where requested, we will provide individuals with access to their personal data held. This will be processed as a Subject Access Request, and we will provide a copy of the information free of charge (unless a request is clearly excessive or unfounded), within one month of the request.

3. The right to rectification

We are committed to rectifying personal data if inaccurate and will respond to a request for rectification within one month of receiving the request.

4. The right to erasure

The college will consider individual requests for deletion or removal of personal data where there is no compelling reason for its continued processing, in line with the conditions set out in the regulation. The college will inform relevant third parties of erasure of personal data; unless it is impossible, or involves disproportionate effort to do so.

5. The right to restrict processing

We will ensure that data processing is restricted in any of the following circumstances:

- Where an individual contests the accuracy of personal data until the accuracy is verified
- Where an individual has objected to the processing
- When processing is unlawful

If data processing is restricted, we will notify any relevant third parties.

6. The right to data portability

We will comply with individual requests to allow an individual to obtain and reuse their personal data for their own purposes across different services.

7. The right to object

We will comply with an individual's right to object to processing of their personal data based on legitimate interests (to 'opt out') or the performance of a task in the public interest/exercise of official authority. We will inform individuals of their right to object using this Privacy Notice.

8. Rights in relation to automated decision making and profiling

We will adhere to GDPR requirements which specify that automated decision making or automated processing of personal data (without any human involvement), including profiling,

can only be carried out where this type of decision making is necessary for a legal contract or based on the individual's consent.

CONTACTS

The Vice Principal (Operations and Administration) is appointed as the Data Controller. If you have any enquires in relation to this policy, please contact the Data Controller, Paul Robinson, via email paul.robinson@atlanticcollege.org.

The Data Controller will also act as the contact point for any requests for personal data, or any complaints in relation to the processing of personal data.

Further advice and information is available from the Information Commissioner's Office:
www.ico.org.uk

Telephone: +44 (0)303 123 1113

CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 23rd May 2018 and last updated on 01st August 2018. Any changes we make to this notice will be posted on this page.