

# PRIVACY NOTICE

## INTRODUCTION

City of Glasgow College is committed to protecting the privacy and security of your personal information. This privacy notice explains how we collect, use and share your personal data, and your rights in relation to the personal data we hold.

City of Glasgow College is the data controller of your personal data. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection laws to notify you of the information in this privacy notice. From 25 May 2018 the General Data Protection Regulation (GDPR) and the UK's Data Protection Act 2018 replaced the Data Protection Act 1998 and now govern the way that organisations use personal data.

## HOW WE LOOK AFTER YOUR PERSONAL DATA

We comply with data protection law. Personal data is information relating to an identifiable living individual. The law says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## DATA SUBJECT RIGHTS

One of the aims of the General Data Protection Regulation (GDPR) is to empower individuals and give them control over their personal data.

### The GDPR gives you the following rights:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erase.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling (making a decision or an evaluation without any human involvement).

## WHY ARE WE PROCESSING YOUR PERSONAL DATA?

**It is necessary for the College to process your personal data in order to comply with the following legal obligations:**

- Recruitment of new members by the Nominations Committee of the Board.
- To contact you in connection with Board business.
- For inclusion in minutes of Board and Committee meetings.
- For inclusion in the College's annual report and financial statements.
- To maintain a Register of Interests containing declarations from each member of the Board and its committees.
- To provide reports and returns required by funding agencies, government departments, and public bodies.
- To monitor and promote equality and diversity within the College in accordance with the Equality Act 2010
- For inclusion in the College's Publication Scheme which is a requirement of the Freedom of Information (Scotland) Act 2002.
- To ensure that Board Members have not been disqualified as a charity trustee in accordance with the Charities and Trustee Investment (Scotland) Act 2005.

**It is necessary for the College to process your personal data in order to protect your vital interests or those of another individual** i.e. in emergencies/ life or death situations/where we believe that a board member or another individual is at significant risk of harm.

**There are also a number of legitimate business purposes for which the College processes your data:**

- To make funding bids or grant applications.
- To fulfill the requirements of the College's banking arrangements.
- To create and update short biographies for the College's website and publications.
- For the administration of expenses claims.

**We will liaise with you in advance and seek your consent before we share your data for the following purposes:**

- To issue parking permits for College car parks.
- To share contact details with other members of the Board.
- To confirm accommodation, dietary and access requirements for events.
- To book training with external organisations.
- To circulate a statement to the electorate and production of ballot papers (staff seeking election to the Board).
- To add you to relevant mailing lists for College publications.

**WHICH PERSONAL DATA DO WE COLLECT AND USE?**

In order to provide our services we need to collect and use your personal data. Below is a list of what this may include and where the data originates from. Please note that certain items in the list are tagged as follows:

\* Denotes information which may contain data classified as **sensitive personal data/special categories of personal data** under the GDPR and as such is subject to a greater level of control and protection.

**V** Denotes information which you provide on a **voluntary basis** or where you are given the option of “prefer not to say” or “information refused”.

**#** Denotes information which will be **published/available to the public**.

**From your application (external Board Members and co-opted members of the Board’s committees):**

- Names<sup>#</sup>
- Email address
- Telephone number
- Postal address
- Educational background
- Qualifications
- Occupational/employment history
- Public/voluntary appointments
- Charity trustee declaration
- Additional statement in support of your application.

**From the staff board member election process:**

- Names
- Faculty/Directorate
- Charity trustee declaration
- Statement to the electorate
- Ballot details and results.

**From your Equality Monitoring Form:**

- Gender
- Age
- Date of Birth
- Religion/belief<sup>\*V</sup>
- Ethnicity<sup>\*V</sup>
- Gender identity<sup>\*V</sup>
- Sexual Orientation<sup>\*V</sup>
- Nationality
- Disability<sup>\*V</sup>
- Highest Qualification
- Reasonable Adjustments/access requirements<sup>\*V</sup>.

**Please note that equality and diversity information is only published in the form of anonymised reports.**

Equality and Diversity data is also shared with the Nominations Committee of the Board to inform its review of the representative balance of Board membership, and with the Board in relevant reports.

**Additional data which may be collected during your term of office:**

- Bank account details
- Car registration number
- Dietary requirements
- Additional contact details
- Biographies<sup>#</sup>
- Correspondence
- Attendance at meetings
- Photographs<sup>#</sup>
- Reasonable adjustments/access requirements<sup>\*</sup>

**WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

You should be aware that in order to provide our services we may need to share your personal or sensitive personal data within the organisation or outside the College. The privacy of your personal data is paramount and your personal data will not be disclosed unless there is a justified legal purpose for doing so.

- **College staff** who need the information for administrative purposes. In the case of candidates for staff board member posts, the statement to the electorate will be shared with all College staff.
- **Contractors and suppliers**, where the College uses external services or has outsourced work which involves the processing of Board Members’ personal data on behalf of the College. The College will ensure that appropriate contracts, terms and conditions and/or data sharing agreements are in place and that the contractors and suppliers process personal data in accordance with the GDPR and other applicable legislation. Examples of suppliers include IT services

and support, confidential waste disposal, mailing services, election ballot services. If we need to transfer your personal information to another organisation for processing in countries that aren't listed as 'adequate' by the European Commission, we'll only do so if we have model contracts or other appropriate safeguards and protection in place.

- **Government bodies, departments and other public bodies**, including the Scottish Funding Council and the Glasgow Colleges' Regional Board in relation to:
  - Public funding.
  - Statistical analysis, monitoring and auditing.
  - Sponsorship.
  - Regulatory matters.
- **Hotels and external venues** - for bookings, to confirm accommodation, dietary and access requirements.
- **Funding bodies and partner organisations** - for contracts and funding bids.
- **Public domain:**
  - The Register of Interests which is available for consultation by members of the public.
  - The College's website.
  - Annual report and financial statements.
  - Other College publications.
  - The College's insurers, legal advisers and auditors.

## SECURITY

The College takes a robust approach to protecting the information it holds. This includes the installation and use of technical measures including firewalls and intrusion detection and prevention tools on the College network and segregation of different types of device; the use of tools on College computers to detect and remove malicious software and regular assessment of the technical security of College systems. College staff monitor systems and respond to suspicious activity. The College is working towards Cyber Essentials certification. Alongside these technical measures there are comprehensive and effective policies and processes in place to ensure that users and administrators of College information are aware of their obligations and responsibilities for the data they have access to in terms of data protection legislation. By default, staff are only granted access to the information they require to perform their duties.

## RETENTION

- Equality Monitoring data is updated annually and completed forms are destroyed once the updated form is received. Anonymised statistics are retained permanently in our archives.
- Information relating to events bookings and parking permits will be retained for the period of office of each member.
- The following records are retained for 6 years after the end of a member's period of office.
  - Application forms.
  - Declarations of interests.
- Records of expenses claims and payments and banking details are retained by the Finance Directorate for 7 years for tax and audit purposes and are then held in the archive indefinitely.
- The following records are retained permanently in our archives:
  - Minutes of Board and Committee meetings
  - Annual reports and financial statements
  - Biographies and photographs.
- Statements to the electorate made by successful candidates for staff board member posts are kept for their period of office. In the case of unsuccessful candidates, the retention period is 6 months after the completion of the election.
- Election results (votes cast, turnout) have a retention period of completion of election plus 6 years.

## CONTACT US

If you would like to request copies of your personal data held by the College (a subject access request) or would like to exercise your other rights (e.g. to have inaccurate data rectified, to restrict or object to processing) please contact our Data Protection Officer.

You should also contact the Data Protection Officer if:

- you have a query about how your data is used by the College.
- you would like to report a data security breach (e.g. if you think your personal data has been lost or disclosed inappropriately).
- you would like to complain about how the College has used your personal data.

**Julia McAfee - Data Protection Officer,  
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