



Privacy Notice for The Trust Project and the Eliminating Poverty Project

West Lothian College is providing you with this information to comply with data protection law, which includes the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, and to ensure that you are fully informed and we are transparent in how we collect and use your personal data.

Who is collecting the information?

West Lothian College is the Data Controller. We have an appointed Data Protection Officer (DPO), who can be contacted by emailing: GDPR@west-lothian.ac.uk

Why are we collecting it and what are we doing with it (Purpose)?

The Trust Project aims to reduce poverty and support people who have trauma or experienced trauma in their life. Part of The Trust Project has been funded by the Scottish Funding Council through The Eliminating Poverty Project, for one year to improve the situation of at least 200 learners and their families.

The Trust Project will work in conjunction with West Lothian College's Student Support Services and the Student Association and to enhance existing support services already provided through these teams.

To support you and collate evidence on the impact of the Eliminating Poverty Project, those students and family members taking part, will be required to attend at least 3 meetings to create an individual action plan, complete evaluations of the services you and your family use and, we may ask you to participate in meetings with an External Evaluator.

The Individual Action Plan, with your agreement may include work with your lecturer, putting you in touch with Student Support Services within the college, the Student Association Development Officer and/or a peer mentor, referral to an external key agency, use of our washing machines/dryers, attendance at activities and events on matters such as budgeting or cooking and the provision of helpful hints and tips.

The Trust Project will work with the College Marketing team to publicise Project. They will use event, training and case studies within the constraints of the project. This will be arranged separately with those individuals who agree for their information to be used in this way.

What personal data do we collect?

About Students:

- Full name
- Matriculation number

About Family members if they also taking part:

- Full name
- Email address

- College or personal email address, depending on preference
- Contact telephone number
- Biographical information if provided
- College Course
- Attendance and Achievement
- Opinion about services received
- Hobbies and interests
- Contact telephone number
- Biographical information if provided
- Opinion about services received
- Hobbies and interests

The lawful basis for the processing?

Whilst Students and their families will agree to take part in The Trust Project, the lawful basis for processing under the UK GDPR is Article 6(1)(c) *“processing is necessary for compliance with a legal obligation to which the controller is subject”* and 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”*. The Post 16 Education (Scotland) Act 2013 and the Further and Higher Education (Scotland) Act 2005 detail the functions that Colleges are required to carry out in terms of provision of support to Students.

For sharing information with external key agencies (as a referral) and for using personal information for marketing purposes, consent will be sought, therefore the relevant lawful basis for this processing is GDPR 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”*.

Who we share the information with?

External evaluator, Emma Houston Consulting

Anonymised qualitative and quantitative data from the project will be shared with the Evaluator to enable them to produce an end of project report capturing the work, the outcomes and impact of the project. The report will be provided to the Scottish Funding Council. All information gathered for the project will be stored securely and destroyed by the Evaluator once the report is agreed with the Scottish Funding Council.

Focus groups on MS Teams will be arranged for the evaluator to interview students and family members to gather information within the constraints of the project which may include biographical information if the participants provide it, but no other information will be discussed or recorded. This will be arranged separately with individuals and facilitated by The Trust Project.

If relevant, for further support, and with your consent we may share your information with:

- External Key Agencies – name and contact details
- Peer Mentors – name, contact details and your hobbies and interests
- Activity and Event providers – very little will need to be shared, however this may include name and email address depending on how the event or activity takes place.
- West Lothian College Marketing Team – Student Case studies, events, activities and training within the constraints of the project.

How long do we hold the personal data?

This data will be held for the current academic year + 3 subsequent years. Following this retention period, your personal data will be destroyed securely following college procedures.

Individuals' rights in relation to this processing

Under data protection law, individuals have a number of rights. These rights are as follows:

- Right to be Informed – i.e. a privacy notice
- Right of Access – this means that you can request access or copies of your personal data
- Right to Rectification – this means you have the right to correct inaccurate or incomplete data held about you
- Right to Erasure (commonly known as the Right to be Forgotten (RTBF)) – this means you have the right to request your personal data held is deleted/destroyed.
- Right to Restrict – this means you have the right to restrict processing of your data, this links with other rights and if there is disagreement then you can request the processing is restricted until the issue is resolved.
- Right to Object – this means you can object to how your data is processed.
- Right to Data Portability – this means you can request your personal data in a machine-readable format (e.g. a .csv file). You can also request that the organisation transfers the file to another organisation
- Right to know of any automated decision making, including profiling – the college does not do this with personal data, so this right does not apply.

Where you have provided your consent for information to be shared/processed, you have a right to withdraw your consent at any time.

Please note some of these rights only apply in certain circumstances and are not absolute. To exercise any of your rights please email the data protection mailbox at GDPR@west-lothian.ac.uk The College will process your request accordingly and respond within one month of receipt of your request.

Complaints to UK Information Commissioner's Office (ICO)

If you are concerned about how your personal data is being used by the College, in the first instance please can you contact the College Data Protection Officer (DPO) at GDPR@west-lothian.ac.uk . If you are not satisfied with the outcome then you can complain to the regulator of data protection, the UK Information Commissioner's Office (ICO). The ICO has guidance on their website here: <https://ico.org.uk/your-data-matters/raising-concerns/>

You can email them at casework@ico.org.uk or call them on 0303-123-113 or you can send a letter to them at the following address:

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