Learner Privacy Notice

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1. Introduction

1.1 Pembrokeshire College ("The College"," we", "us") is required by law to collect and process personal information about our pupils. We are committed to being transparent about how we collect and use this information and to meet our data protection obligations.

1.2 This privacy notice provides you with information about how we collect and process personal information of our learners and their parents/carers in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Who is the Data Controller?

2.1 Pembrokeshire College is the 'data controller' for the purposes of data protection law and is registered with the Information Commission Data. Our registered office is Pembrokeshire College, Haverfordwest SA61 1SZ.

2.2 The College has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO on DataProtection@pembrokehsire.ac.uk

3. What data do we collect?

3.1 We collect and process a wide range of information about learners and parents/carers. This includes:

- Personal information such as your name, date of birth, gender, address, email address, phone numbers, emergency contact details.
- Characteristics such as ethnicity, language, country of birth
- Attendance information such as the number of sessions attended, the number of absences, the reasons for those absences and any previous schools attended;
- Assessment and attainment information such as current pupil progress, predicted progress and, where appropriate, data relating to any assessments, tests or exams taken;
- Behavioural information, which may include information about your general classroom behaviour including any awards gained, together with any detentions, fixed term or permanent exclusions received;
- Pastoral information;

- Safeguarding information including notifications from the police, court orders and/or social care involvement;
- The Learning Records Service will give us the Unique Learner Number (ULN)
- Destination data (this is information about what learners do after leaving College, for example, different college, school, university, apprenticeship, employment);
- Information about your use of our information and communications systems through our filtering and monitoring software;
- Photographs;
- CCTV images;
- Correspondence and complaints;
- Details of any other information that is provided to us by learners and parents/carers during the course of our relationship with you
- Details of your qualifications, skills, experience and employment history
- Information about your remuneration, including entitlements to benefits such as job seekers allowance, pensions or insurance cover
- Details of your bank account and national insurance number
- Information on your marital status, next of kin, dependents and emergency contacts
- Information about your nationality and entitlement to study/work in the UK
- Details of your schedule (days of work/study and working/study hours) and attendance at Group/work
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;

4. What sensitive information do we collect?

4.1 There are additional provisions in the legislation that enable us to process personal data that is known as special category personal data. Therefore, we may also collect, store and use the following more sensitive types of personal information including:

- Relevant medical information including any conditions, disabilities or allergies pupils may have and doctors' details;
- Additional learning needs information. This is information about any particular needs that you have, any funding that is received specifically for you and any statements of individual needs;
- Information relating to ethnicity, nationality and religion;

- Information relating to hardship or learner financial support
- Information about medical or health conditions, including whether or not you have a disability for which the College needs to make reasonable adjustments; and
- Equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief.
- Information about your criminal record and unspent convictions.

5. Why do we collect and use this information?

5.1 Data collected by the College is used for funding, statistical, marketing and administrative purposes connected with your studies and professional courses. We have set out below a description of all the ways we plan to use learner and parent/carer information, and which of the legal bases we rely on to do so. We may process learner and parent/carer information for more than one lawful basis depending on the specific purpose for which we are using your information.

Purpose/Activity	Legal Basis
To enable and support teaching, learning & funding	Contractual obligations Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
For events and enrichment activities related to your studies	Contract Necessary for the purposes of a recognised legitimate interest
For Educational Visits	Consent
To ensure technical support for the college systems and IT equipment	Contractual obligations
To provide appropriate pastoral care and ensure you have access to appropriate support	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest Consent
To support the health, safety and wellbeing of learners	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest Necessary for the purposes of a recognised

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	legitimate interest
To keep learners and staff safe	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest Necessary for the purposes of a recognised legitimate interest
To support learner transition from school	Contractual obligations to provide you with an excellent learning experience Necessary for the performance of a task carried out in the public interest
To provide predicted grades and support associated with your course	Contractual obligations to provide you with an excellent learning experience
To connect past learners together via our alumni service	Consent
To provide additional funding and activities	Contractual obligations
To inform you of new courses and opportunities	Necessary for the purposes of a recognised legitimate interest
For insurance purposes	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To use your photographs in promotional material for the College	Contract Necessary for the purposes of a recognised legitimate interest Consent
To comply with statutory duties placed upon us for Medr/Welsh Government for data collections and in order to obtain funding for your course	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To comply with a contractual obligation to share your information with other third parties, including awarding bodies, the Learner Record Service and Careers Wales in order to perform the administrative processes related to your studies	Contractual obligations

To process payments from parents/carers	Necessary for the performance of a contract

6. Why do we collect and process sensitive information?

Purpose/Activity	Legal Basis
To ensure dietary needs are catered for	Vital interests Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
To make reasonable adjustments for the provision of learning	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
For statistical analysis of our learners	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
To keep learners and staff safe	Necessary to comply with our legal obligations Necessary for reasons of substantial public interest Schedule 1, Part 2, (18) Data Protection Act 2018 – Safeguarding children and adults at risk Schedule 1, Part 1, (3) Data Protection Act 2018 – Public Health
To support learners with additional learning needs	Necessary to comply with our legal obligations Necessary for reasons of substantial public interest Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes

7. Collecting personal information?

7.1 We collect your information from various sources including:

- directly from you,
- your parents / legal guardian (if you are under 18)
- your previous schools / colleges / awarding bodies
- the learner record service
- your employer
- Department of Work & Pensions and benefits office
- information that we generate in the course of considering your application and/or during your studies
- your IP address via cookie consent on our website
- CCTV footage from onsite cameras
- photographs from College events
- occupational health/Counselling services
- other third parties, such as local authorities, the court or other professionals involved in a learner's care

7.3 We sometimes audio/video record sessions/lessons/assessments for learners or staff development and assessment. This will generate personal data including learner images, names, contributions, and will be protected, processed and retained in the same way as all personal data, in line with our data protection policies.

8. Storing personal information

8.1 Information held by Pembrokeshire College will be kept for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Information will be stored in accordance with our Data Retention Policy

8.2 Details of retention periods for different aspects of personal information are available upon request. After this period, we will securely destroy or anonymise personal information. Our complete retention schedule is available on request.

9. Who do we share your information with?

9.1 **For all learners** - The College reserves the right to contact your parent/guardian regarding your progress, attendance and disciplinary issues and to share your data with them. Your parent/guardian will have access to your eILP (Ontrack)/online reports. If you

are concerned about your parents/guardian receiving information, you must contact the Safeguarding Team (safe@pembrokeshire.ac.uk)

9.2 **For learners sponsored by their employer** - The College reserves the right to contact your employer regarding your progress, attendance and disciplinary issues and to share your data with them.

9.3 **Third Party List** – There are a number of third parties with whom we share data. We do not use any third party located outside of the EU and all data storage is also held within the EU. The College routinely shares learner information with:

Category of sharing	Why we share
The Local Authority	We will share certain information about learners aged 16+ with our local authority as they have responsibilities in relation to the education or training of 13-19 year olds
UK Government departments, Welsh Government, Medr, Estyn and associated organisations including Learner Record Services	We send data to government organisations in order to gain funding, to enable teaching and learning, to support learners and potential learners, to comply with legal requirements
Awarding Bodies	For the administration of paperwork relating to examinations and assessments and in compliance with any investigations
Legal Organisations (solicitors, police, courts, tribunals)	To support the safety of learners and staff, for court proceedings and to gain legal advice
Auditors, Insurers and other professional advisers	For testing and monitoring College activities. To ensure the college is suitably insured to make it a safe environment
Health and social welfare organisations, including NHS agencies and services	For support services for learners
Youth Support Services	For support services for learners
Careers/Employers/Training/Work Placement providers	To enable teaching, learning & funding for learners
Educational Organisations (schools, universities, colleges)	To enable teaching, learning & funding for learners
Other third parties we may engage the services of for the purposes of the administration of the	To enable staff and learners have an efficient service when using the College

College, for example our management information system provider	facilities
Alumni Services	To connect past learners together and inform them of college activities
Student Finance	To support learners with funding their studies
Service Providers - Transport	For transport to and from College, trips and visits
Debt Collection	To collect outstanding fees on behalf of the College
Statistical Analysis	To provide information in the public interest related to college performance
Host Families	For international learners placed with Host Families during their studies with the College

9.4 For privacy information on the data the Medr/Welsh Government collects and uses for statutory pupil data collections, please see: Medr Privacy Notice - Lifelong Learning Wales Record: Privacy Notice 2026 (version 1.0)

10. Does the College rely on automated decision making?

10.1 The College does not use automated decision making currently.

11. How do we protect your data?

11.1 The College takes the security of your data seriously. It has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

11.2 All staff are required to take data protection training on an annual basis.

12. Your rights

12.1 Data protection law gives learners certain rights about how their information is collected and used. To make a request for your personal information, please contact our Data Protection Officer by emailing Data.Protection@Pembrokeshire.ac.uk

12.2 Under data protection law, you also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commission if you feel we have not used your information in the right way.
- There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:
- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

12.3 For further information on how to request access to personal information held centrally by the Welsh Government/Medr, please see their privacy notice – Lifelong Learning Wales Record: privacy notice V9.0 2025 [HTML] | GOV.WALES

13. Complaints

13.1 If you have a concern about the way we are collecting or using your personal information, you have the right to make a complaint to us. Any complaints relating to data protection must be directed to our Data Protection Officer (DataProtection@pembrokeshire.ac.uk). Data protection complaints will be dealt with in accordance with the procedure set out in our Data Protection Policy.

13.2 If you remain dissatisfied with our response, you can make a complaint directly to the Information Commission at - Make a complaint about how an organisation has used your personal information | ICO.