

Privacy Notice for Students at The Windsor Forest Colleges Group



Notice about how we use your personal information

The Windsor Forest Colleges Group takes your privacy very seriously. In the UK there are data protection laws which sets out rules for organisations to help keep personal information that they collect about you, safe. This is referred to in this document as 'personal data' and 'special category personal data'. This Privacy Notice sets out what personal data we collect about you, why we collect it and what we do with it.

If you have any questions about the way we use your personal data, please contact our Data Protection Officer. Our address is Slough and Langley College, Station Road, Langley, Slough, SL3 8BY. You may also contact us by email at data.protection@windsor-forest.ac.uk or by calling us on 01753 793000.

In order to become a student at The Windsor Forest Colleges Group, you will be asked to provide us with information about yourself. Unless required or permitted by data protection regulation, we will always ask you before using it for any other reason.

There is also other information that we may collect about you or any other person that visits our colleges, and more information about that can be found in our General Privacy Notice. We process different types of personal data. Processing means the collection, use, Storage and destruction of your personal data. The different categories of personal data could include:

- Basic identifying details including your name, address, date of birth
- Educational records, including information about attendance, exam results and coursework
- Photos and other types of images, including video and CCTV footage
- Information about your health and wellbeing
- Information about your special educational needs
- Correspondence about you, including letters and emails

We also collect information which is classed as special category personal data. This is because this information is given extra protection by law as it is particularly sensitive, so we only collect this kind of information where the law allows. The special categories of personal data are:

- Race or ethnic origin
- Political opinions, religious beliefs, trade union membership
- Genetic information, biometric information (if it is used to identify you), health information
- Information about a person's sex life or sexual orientation

Examples of when we might collect special category personal data are:

- Religious beliefs, e.g. making allowances for religious events or dietary requirements
- Information about health so that the college can make allowances for your physical or learning needs.

We also collect your next of kin or carer details for welfare and safeguarding reasons.

Why we collect your information

We have to collect a certain amount of information in order to be able to provide you with education services and if we do not have this information, you may not be able to study at any of our colleges. We are required by law to collect information about you in order to:

- Comply with our legal obligations such as:
 - Providing information about you to the Department for Education
 - Monitoring or reporting attendance and progress
 - Ensuring you are provided with appropriate care
 - Performance reporting at college level

and

- Carry out necessary tasks which are in the public interest such as:
 - Safeguarding your and our other students
 - Obtain funding information
 - Obtain student loan information
 - Obtain financial information for cafeteria pre-payment cards or bursary payments
 - Supporting your learning
 - Monitor the use of IT systems for appropriate usage
 - Deal with complaints or investigations

Where we need to process your personal data and it falls outside of the scope of the two tests above, we can use 'legitimate interest' as the lawful basis for processing. This is where we believe our need to process your data outweighs the potential impact on your privacy.

This includes:

- Using your image for ID cards in order to access college premises and IT functions
- Using images, video and audio recordings for reasonable purposes such as college promotional materials
- Sharing your personal data with third parties such as IT systems providers in order to provide you with an education

We can use Consent as the basis to use your personal data, such as when we want to use your image in a college social media post. When we ask for consent to use your personal data, you can say no. Even if you do give your consent you can change your mind later, you just need to inform the College in writing.

If there is a need to process special category personal data, there has to be one of a number of very specific legal reasons for doing this. These are:

- Explicit consent, e.g. use of biometric data or facial recognition
- Vital interest, e.g. to share information about your health with a medical practitioner in a medical emergency
- Legal claims or Judicial Acts, e.g. in the event of a legal claim we may use your personal data as part of the defence
- Reasons of Substantial public interest, e.g. to share information with the police where necessary to protect you or other people

- Health or Social Care, e.g. where it is necessary to share your information with a health professional such as a therapist
- Public Health, e.g. where information needs to be collected and used in a public health event such as the COVID 19 pandemic. In this instance, the data would be handled by a health professional or someone who by law must keep your information confidential.

How we collect your personal data

Most of the information we need to collect about you comes directly from you, when you enrol on a course or after you start your course. Other information will be collected during the course of your study from teaching staff, e.g. attendance, progress reports, or possibly from other organisations such as the Department for Education or local authority, health professionals, etc.

Where do we store your personal data?

Your personal data is stored securely in different locations depending on what type of information it is, e.g. attendance information is stored in our student information management system, whereas your medical information will be on a different system where only wellbeing and health information is kept.

The college has controls in place to ensure that your information can only be accessed internally by staff who are authorised to do so.

How long do we keep your personal data?

- If you apply for a course and then do not then enrol, we keep your data for 5 years.
- If you do enrol, the college would keep your personal data in line with the enrolment data retention requirements, which can be for up to 12 years from your last year of enrolment.
- CCTV data is kept for 14 days, unless there is an incident when it will be kept for the period of the investigation plus 12 months.

How we share your personal data

We share your personal information with organisations outside of the college group where the law says we can or should including:

- The Department for Education
- Other funding bodies
- The local authorities
- Examining awarding bodies
- Organisations that provide services to help us run the college such as IT providers and financial institutions
- Health and social care organisations or individuals whose job it is to help you
- Your next college (if applicable)
- Our legal adviser, accountants or auditors

The College also uses third party processors in order to be able to provide you with our services. A list of the processors can be found in the appendix at the end of this document.

Marketing

When you make an enquiry or apply to enrol on a course, we may use your personal information in order to contact you to provide you with information about your application, our courses or to provide information about the college. We will not share your details with any other organisation for marketing purposes. If you would not like to receive information about the college, please let us know. However, this may result in you not receiving important information you may need to progress your application.

Transfer of your data to other countries

Occasionally we may need to transfer your personal data outside the UK for processing, although where possible, the college would opt for data to be processed within the UK or EU. Where your personal data is or may be transferred outside the UK, we ensure that the organisations only transfer data to countries with an Adequacy Decision or the organisation has Standard Contractual Clauses in place. This means that there is sufficient protection in place to safeguard your personal data from a regulatory perspective.

However, for international learners sponsored by their country we will confirm learners are enrolled and attending. Model clauses are in the agreements/contracts with these countries who send international students.

Automated decision making and profiling

The college does not use automated decision making, i.e. we do not use your personal data to make decisions about you without human involvement.

When you send an enquiry to the college via a public channel, e.g. email or WhatsApp, depending on the nature of your enquiry, you may receive a response that has been generated using AI (Artificial Intelligence). However, this is not automated decision making. AI generated responses do not determine outcomes, eligibility, disciplinary action, academic decisions or safeguarding conclusions. Responses are constrained by pre-defined rules, safeguards and knowledge sources. In addition, high risk, sensitive or ambiguous messages are referred to human staff for review and response. You may request human review or intervention at any time.

Your Rights under Data Protection Laws

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;

- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly used, machine-readable format.

Students Union

The information that you give us

For marketing purposes we collect: names, addresses, dates of birth, email addresses, course, year group and any sensitive data disclosed in election nominations such as LGBT.

The uses made of your personal information

We will use your information to:

- contact you about student union information and elections.

The legal basis on which we collect and use your personal information.

Where you have previously studied at the College or commenced an application process with us, then we will send you information about the courses we provide on the basis of our legitimate business interests. In doing so, we will comply with the requirements of the “soft opt in” and offer you an opportunity to refuse marketing when your details are first collected and in subsequent messages (by way of own unsubscribe).

Any other marketing we carry out will be on the basis of consent.

How long we keep your personal information.

- Current year plus previous year

How we share your personal information.

We may share the personal information that you give us with the following organisations (or types of organisations) for the following purposes.

Organisation / type of organisation:

- National Union of Students
- College Students and Staff for election purposes

How to make a complaint:

You have the right to make a complaint about the way your data has been processed or how your data request has been handled to the Information Commissioner’s Office (ICO).

In the first instance, please write to the college:

By email – data.protection@windsor-forest.ac.uk or

By post – The Windsor Forest Colleges Group, Data Protection Department, Station Road, Langley, Berkshire, SL3 8BY

If you believe your complaint has not been resolved by the College then you may make a complaint to the ICO at <https://ico.org.uk/make-a-complaint/>

CHANGES TO OUR PRIVACY POLICY

This privacy notice has been prepared in accordance with the UK General Data Protection Regulation ("GDPR") the Data Protection Act 2018 and the Data (Use and Access) Act 2025. We keep our privacy policy under regular review. You can find the latest copy of on the college website <https://www.windsor-forest.ac.uk/about-us/governance/>.

The Windsor Forest Colleges Group is registered with the Information Commissioner's Office and our registration number is Z465993X. The Information Commissioner's Office is the UK's regulator of Data Protection and Freedom of Information.

APPENDIX 1 – THIRD PARTY PROCESSORS

Organisation / type of organisation:	Purpose:
Schools	To process the application and confirm enrolment in line with our duty around NEET
Local Authorities	<p>As part of our legal obligation under the Education Act 1996 section 507B for compulsory education for under 18-year old students</p> <p>To support students with EHCPs to obtain learning support</p> <p>To support students under the care of social services</p>
Youth Services	To support applicants where necessary with careers advice and other support services
Department for Education (DfE)	As part of a legal and contractual obligation to gain funding.
Learner Records Services	To gain Unique Learner Numbers and Personal Learning Records showing achievement, which is part of our legal requirements with our funders and awarding bodies
AEB LLS	As part of a legal and contractual obligation to gain funding
Awarding Bodies and Professional Organisations	In order to enter students for relevant examinations and achieve their courses
Office for Students (OfS)	As part of a legal obligation. The OfS is the regulator of the higher education sector in England and has certain statutory functions set out in the Higher Education and Research Act 2017
Survey Providers (Google Forms, Microsoft Forms, Salesforce marketing Cloud, Meta WhatsApp Flows, GovNotify)	Limited personal data such as name, course and contact details are passed to 3 rd parties to undertake surveys on the college's behalf to ensure and improve

	quality of provision to students and national benchmarking.
Mides	Limited personal data such as name, course and predicted grades / final grades in order to benchmark results across the sector.
ALPS	Limited personal data such as name, course and predicted grades in order to benchmark results across the sector.
6 Dimensions	Limited personal data such as name, course, attendance and grades in order to benchmark results across the sector.
Mailshot services and survey providers (ConstantContact, Salesforce marketing cloud, GovNotify)	Limited personal data such as name and contact in order to facilitate college communications and promote college courses
Internal and External Auditors	To audit college processes which may include review of systems and student data
Ofsted	To inspect college processes, achievement and student data
Apprenticeship employers	To share basic personal details, course information, attendance data, medical information (where applicable), exam results

System/Software/IT Service Providers

Organisation / type of organisation:	Service:
Microsoft Azure	At the point of application IT accounts are created using Azure Active Directory, now called Microsoft Entra. The Group also uses Microsoft's UK South data centres for storage and processing of data - including Cognitive/AI Search services for information retrieval and App Services to run internal web applications. All student data held within Microsoft data centres is

	held and processed within the UK South region.
Google Workspace	At the point of application a student IT Account is created within Google Workspace. We use Google Workspace for online learning and storage and processing of data. All student data remains within the European union.
SalesForce	At the point of application (or event/enquiry registration) we create a user account within the SalesForce database. We use SalesForce for management of apprenticeship records, learner communications, processing of applications, work placements, and employer engagement.
LinkedIn Navigator	We share information held in the Salesforce database with LinkedIn to generate student prospects for specific adults' courses. LinkedIn processes member data in the US – including use of cognitive/AI search services for information retrieval, security and content monitoring.
Tribal Education	In the event of a student management system failure or other software error
N8N	To enable AI handling of enquiries that are received via public channels, based in Germany
Google Gemini	To enable AI handling of enquiries that are received via public channels, based in the EU
Open Router	To enable AI handling of enquiries that are received via public channels via ZDR (Zero Data Retention) models, based in the EU
Supabase	A platform to enable AI handling of enquiries that are received via public channels

Online services

Unifrog	Limited personal data required to create a login in order to access careers and jobs advice
My ID Card	Personal data such as name, date of birth and image to generate an approved form of ID
CPOMS	Limited personal data such as name, course and circumstantial information that may be sensitive in order to fulfil safeguarding obligations
Social Media (FaceBook, WhatsApp, LinkedIn, Instagram)	<p>If you like or follow our pages then we will communicate with you in this way</p> <p>We may use social media to collect feedback or make announcements to students</p>
Koha	To provide library services. Limited personal data required to create an account to access the service