

## Graduate Apprenticeship Privacy Notice

### Background

This Privacy Notice is designed to explain how and why Glasgow Caledonian University (GCU) processes your personal information when you apply to or become a student on a Graduate Apprenticeship programme.

Graduate Apprenticeships provide a way into degree-level study for individuals who are currently employed, or who want to go straight into work.

GCU processes your personal information in accordance with the overarching principles and requirements set out in the UK General Data Protection Regulation and the Data Protection Act 2018 ('Data Protection Law'). What this means is that GCU processes your data in a way that is:

- ✓ Lawful, fair and transparent;
- ✓ Compatible with the purposes that we have told you about;
- ✓ Adequate and necessary, we only use the data we need to use for the reason we told you;
- ✓ Accurate and up to date;
- ✓ Not excessive, we only keep your data for as long as we need it; and
- ✓ Secure and protected

### Who will process my personal information?

Under Data Protection Law GCU is the "data controller". This means that GCU is responsible for deciding how it processes, stores and shares your information and complies with requests relating to your personal data.

### Why do we collect and use your personal information?

GCU will collect and process personal information about you for the purpose of managing your application and administering your course.

Further information on how GCU uses your information as a GCU student can be found in the student Privacy Notice.

<https://www.gcu.ac.uk/currentstudents/essentials/policiesandprocedures/studentprivacynotice>

### Keeping information updated

GCU strives to ensure that all personal information is accurate and up to date. Should you need to update your information, please let us know by emailing [apprenticeships@gu.ac.uk](mailto:apprenticeships@gu.ac.uk) or contacting us using the details below:

The Institute of University to Business Education  
George Moore Building  
Glasgow Caledonian University  
Cowcaddens Road  
Glasgow, G4 0BA

### How long is the information kept?

GCU will retain your information for as long as necessary for the purposes described. We will retain your personal data for a longer period where necessary to comply with our legal or regulatory obligations or to initiate or defend a legal claim.

Further information is available in the Records Retention Schedules:

<https://www.gcu.ac.uk/recordsmgt/>

#### **Where do we obtain information from?**

We obtain data from a variety of sources to include but not limited to:

- ✓ Information you have provided when you made an enquiry in person, by telephone or by email;
- ✓ Personal data provided by previous educational establishments; employer/s; referee/s; parents or guardians;
- ✓ Information you have provided on your application form (including applications made via a third party such as UCAS, partner organisations or recruitment agencies);
- ✓ Previous or current educational establishment/s;
- ✓ Information you provide us with during the course of your study;
- ✓ Information built up about you during your studies e.g. grades;
- ✓ Funding organisations; and,
- ✓ Partner organisations such as professional bodies, employers, and other educational establishments for the purposes of external study or exchange

#### **What information is being collected and used?**

Personal information, or personal data, means any data that could be used to identify a living person. Information may be hard copy or electronic format. This includes, but is not limited to:

- ✓ Personal information including name, address, contact telephone numbers, email addresses, date of birth, student ID number, academic records
- ✓ Special category personal information may also be processed where it is necessary and lawful for us to do so, including health information you disclose to us so we can support you during your studies.
- ✓ Information relating to emergency contacts which you provide
- ✓ Further information is available in the GCU student privacy notice available on our website at:  
<https://www.gcu.ac.uk/currentstudents/essentials/policiesandprocedures/studentprivacynotice>

GCU will minimise the personal and special category data it collects, to only that which is strictly necessary. Where it is necessary to process special category data, GCU will implement appropriate safeguards to protect the data.

### **Who is the information shared with?**

We may share your personal information and special category information with parties within GCU and external to GCU where the law allows or requires us to and where it is necessary for us to do so to support your studies. These include:

- Employees and departments at GCU that require it in the course of their duties and to support your studies.
- Relevant UK government departments
- Professional, statutory and regulatory bodies e.g. Scottish Public Services Ombudsman, Office of Scottish Information Commissioner, Information Commissioner’s Office, Health & Safety Executive;
- Law enforcement agencies;
- Relevant authorities dealing with emergency situations at the GCU;
- Research funding bodies or bodies managing financial administration/monitoring of research funds including research councils and EU funding bodies;
- Service providers;
- Academic institutions managing your exams;
- Any other authorised third party to whom GCU has a legal/contractual obligation to share data with.

### **Employers**

We may share information relevant to your academic performance with your employer or the party sponsoring or funding your studies, including:

- Confirmation that you have commenced your course;
- Information that you are progressing in the programme, including attendance data, examination results and qualifications gained;
- Notification of you leaving the programme early; and
- Notification of you suspending your studies at GCU for a fixed period of time.

Information on your progress may be shared with your employer at various stages throughout the academic year at their request. We will not share any sensitive information, including special category information or information relating to a disciplinary matter with your employer without notifying you and, where necessary, obtaining your consent.

### **How is the information kept securely?**

Information is kept securely on GCU equipment in line with GCU’s Information Security and Data Protection Policies. Access is restricted to only those staff or authorised agents who require it and on a “need to know” basis.

### **Will the information be used for automated decision-making or profiling?**

Automated decision making and profiling activities are not carried out in the context of GCU Graduate Apprenticeship programmes. If we do undertake any of these activities, we will let you know.

### **Data Transfers**

If we need to share your personal data outside the UK, we ensure appropriate safeguards are in place to protect your personal data.

### **Your legal rights**

In certain circumstances, you have the right to:

- Find out what personal information GCU processes about you and to request a copy of the data
- Request that GCU corrects inaccurate or incomplete personal information about you
- Withdraw consent to process your personal information, if you were asked for and provided consent.

If you think the GCU is acting unfairly or unlawfully you can:

- ✓ Object to the way we are using your data
- ✓ Complain to the UK Information Commissioner's Office

Under certain conditions, you also have the right to request that GCU:

- ✓ Restrict the use of your data
- ✓ Erase your information or ask GCU to stop using it to make decisions about you
- ✓ Provide you with a portable electronic copy of data you have provided to GCU

Please contact the [dataprotection@gcu.ac.uk](mailto:dataprotection@gcu.ac.uk) if you wish to exercise/enquire about any of these rights.

### **Contact Details**

Data Protection Officer (DPO)  
Department of Governance  
Britannia Building Glasgow  
Caledonian University  
Cowcaddens Road Glasgow, G4 0BA

Email: [dataprotection@gcu.ac.uk](mailto:dataprotection@gcu.ac.uk)

### **Legal basis for using your personal information**

GCU is required to establish a lawful basis for processing your personal information. We may process your personal information on the basis that:

- You have provided your consent;
- It's necessary for the purpose of enter into a contract with you;
- It's necessary for GCU to comply with a legal obligation;
- It's necessary to protect you or another individuals' vital interests (in an emergency);
- It's necessary for GCU to perform a task in the public interest as an official authority; and
- It's in GCU's legitimate interest to process the information, for example, to respond to your enquiry.

Where special categories of data are processed GCU will do so on the basis that we have your explicit consent or another legal reason within Article 9(2) of UK GDPR or a condition under Schedule 1 of the Data Protection Act 2018 will apply.

### **Further information**

The Information Commissioner's Office website: <http://www.ico.org.uk>

GCU's Data Protection webpages: <https://www.gcu.ac.uk/dataprotection/>

Further information is available in the Student Privacy Notice and Staff Privacy Notice:

<https://www.gcu.ac.uk/dataprotection/>