

Fair Processing Notice

Student Finance (SF) administers grants to enable all eligible students to access higher and further education, and operates within the Committee *for* Education, Sport and Culture. The Committee *for* Education, Sport and Culture is the registered data controller for all Education areas of delivery and their fair processing notice can be found [here](#).

Student Finance works with students, parents and further/higher educational institutions to deliver these grants, and also sometimes works with other States of Guernsey services such as Employment and Social Security, Health and Social Care, Home Affairs to ensure eligibility. We also help advise on strategy and policies within Education, Economic Development and the States of Guernsey to help inform decision making and increase awareness of upcoming matters.

1. The Data Protection Law

The controller (The Committee *for* Education, Sport and Culture) acknowledges its obligations as per the [Data Protection \(Bailiwick of Guernsey\) Law, 2017](#) which provides a number of requirements in terms of processing activities involving personal data. The controller further acknowledges the general principles of processing as well as the rights of a data subject. This notice includes further information regarding the controller's compliance with the principles of processing; for further information in relation to the rights of a data subject, please visit www.gov.gg/dp.

2. The Principles of Processing

a. Lawfulness, fairness and transparency

Personal data must be processed lawfully, fairly and in a transparent manner.

What personal data does Student Finance collect?

In order for Student Finance to administer grants to students to enable them to access further and higher education and also to collate data to inform future policy, we must collect the following personal data:^[LM1]

Information Source and its Operational Function	Personal Data	Lawful Basis for Processing
Gained from the application form (part B) and used to identify	Student's full name, date of birth, address, contact details, residency status, educational	

student	history, marital status, income and asset details, course details, qualifications already held	
Gained from the application form (part A) and used to identify the parents/partners and the resulting family configuration to assess parental contribution	<p>Basic personal data relating to parents/partners and appointed guardians such as full name, address, marital status, contact information, residency status, income and asset information, members in the household</p> <p>Where applicable: any other siblings/ dependent children in the household (their names & dates of birth too), court order/judicial agreements</p>	
Gained from the institution to ensure that students are attending/ aren't having issues with attendance	attendance/engagement levels while on the course, degree result	
Gained from a phone call/email to the student after completion of degree to compile the Graduate Destination Survey (all information is anonymised before publishing)	graduate destination information	
Special Category Data:		
Gained from diagnostic reports provided by students and needs assessments provided by the institute/access centre, so we can provide 'Disabled Student Allowance' funding to students where requested	Health and medical information of students including any special educational needs information	

Special Category Data

Any data collected by Student Finance helps us check that we are treating our customers appropriately and fairly. You are under no obligation to provide us with Special Category Data, however you would need to consider that we may not therefore be able to provide you with extra services as is sometimes requested, such as funding for Disabled Student Allowance, or requested funding for a repeat year on medical grounds.

How do we collect personal data?

SF collects data from you from the application forms you fill in for your funding of your course each year, from any correspondence (letters, emails) you send us during the year, and from contact with you over phone calls or in face-to-face appointments. We also contact your higher/further education institute to collect data on your attendance levels to ensure you are still eligible for support. Lastly, we may contact you by phone or email in the year after your course to collect data (which is anonymised when it is collated for reports) for graduate destination information.

How do we use personal data?

SF uses the personal data collected to assess you correctly for funding for which you may be eligible. We also use it to:

Support our internal record keeping.

Provide information to the States of Guernsey about how Student Finance services are used, and graduate destination information, although the data used is completely anonymised.

With whom might we share personal data?

We contact the relevant institutions with student names and contribution details to ensure we are invoiced appropriately for our contribution towards your fees.

As we are under a duty to protect public funds, we may use the information you have provided us with to prevent and detect fraud, so we may therefore share the information with other organisations which handle public funds.

If you opt into services e.g. keeping in touch about employment opportunities in Guernsey, your name is given to Careers Guernsey who then forward the employment opportunity information on to you, but we/they do not share any of your personal data with employers.

What are your rights to privacy?

Privacy and our website

The States of Guernsey does not identify people that are browsing www.gov.gg/studentfinance.

This site www.gov.gg/studentfinance does not collect any data which identifies you personally, without your knowledge.

However, www.gov.gg/studentfinance does use cookies to collect anonymised information about how you browse this site, unless you [opt-out](#) or [change the settings on your device](#).

The www.gov.gg site also contains links to and from other websites. Usually, you will see a difference in the look of the web pages, flagging that you have gone into another website but if you are unsure, you can check the web address. Other online services and transactions that we link to or from will have a different privacy policy, so if you go to another website from this one, always read the privacy policy on that website to find out what it does with your information.

Cookies www.gov.gg/studentfinance puts small text files (known as 'cookies') onto your computer to collect information about how you browse this site. The information collected is not personally identifiable. Cookies are used to:

- measure how you use the website, using Google Analytics, so it can be updated and improved based on your needs
- remember the notifications you've seen so that we don't show them to you again

Google Analytics stores information about:

- the pages you visit on gov.gg
- how long you spend on each gov.gg page
- how you got to the site
- what you click on while you're visiting the site^[WT2]

If you do not want this data to be collected when you browse www.gov.gg/studentfinance, you can [opt-out](#).

If you'd like to control cookies used by other sites as well as gov.gg, you can [change the settings on your device](#).

b. Purpose limitation

Personal data must not be collected except for a specific, explicit and legitimate purpose and, once collected, must not be further processed in a manner incompatible with the purpose for which it was collected.

The controller acknowledges its responsibility with regards to this data protection principle and therefore the controller maintains that it will not further process that personal data in a way which is incompatible to its original reason for processing as specified in section 2a, unless the controller is required to do so by law. The personal data will not be transferred to a recipient in an authorised or an unauthorised jurisdiction (as per the definition within data protection law), unless permission has been granted to do this.

c. Minimisation

Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed.

The controller maintains that it will only process the personal data which is detailed in section 2a, and will not process any further personal data that is not necessary in relation to the original reason for processing personal data as specified in section 2a, unless the controller is required to do so by law.

d. Accuracy

Personal data processed must be accurate, kept up-to-date (where applicable) and reasonable steps must be taken to ensure that personal data that is inaccurate is erased or corrected without delay.

The controller will ensure that all personal data that it holds is accurate and kept up-to-date, and any personal data that is inaccurate will be erased or corrected without delay.

If you believe that any information we hold about you is incorrect or incomplete, please contact Student Finance studentfinance@gov.gg or Tel: 01481 706560 and we will promptly correct any information which was found to be incorrect.

e. Storage limitation

Personal data must not be kept in a form that permits identification of a data subject for any longer than is necessary for the purpose for which it is processed.

In order for Student Finance to provide you with funding, advice and guidance services that will best meet your needs, any personal data you provide and any support we provide to you will be recorded electronically on our secure database, and physical data is held in secure, locked filing cabinets. As Student Finance requires this information to determine eligibility for financial support, we are required to retain previous records and student data in order to prevent fraudulent or ineligible applications.^[LM3]

f. Integrity and confidentiality

Personal data must be processed in a manner that ensures its appropriate security, including protecting it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Personal data and special category personal data will be retained in accordance with the States of Guernsey Records Management Policy and the States of Guernsey Retention and Disposal schedule. Student Finance holds any personal data and special category data in electronic format on the States of Guernsey secure server and on our locally-held database 'GUESS'). This database is hosted and managed by The States who have the appropriate ISO

security and quality management processing certification. Data is securely stored in hard copy in our locked filing cabinets.

Access to electronic and paper records is tightly controlled. Employees have signed a Declaration of Secrecy and protocols are followed to ensure that employees only have access to areas and documents required to undertake their role and access is monitored.

Student Finance adopts the information security standards of the States of Guernsey.

g. Accountability

The controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

3. Contact Details

The contact details of the controller are as follows:

The Committee *for* Education, Sport & Culture

Tel: 01481 717000

Email: educationsportandculture@gov.gg

The contact details for the Data Protection Officer of Education, Sport and Culture are as follows:

Data Protection Officer, the Committee *for* Education, Sport and Culture

Tel: 01481 717000 (extension 677 2129)

Email: data.protection@gov.gg