

Lakes College General Privacy Notice

Notice about how we use your personal information

We are the data controller of personal information about you. We are Lakes College West Cumbria. Our address is: Hallwood Road, Lillyhall Business Park, Workington, Cumbria, CA14 4JN.

Our Data Protection Officer is Karen Wilson. If you have any questions about this policy or the ways in which we use your personal information, please contact our Data Protection Officer at the above address, on 01946 83930 ext. 1010, karenw@lwcw.ac.uk.

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

- college student, applicant, or former college student
- employer
- member of staff or job applicant
- visitor to the College
- local stakeholders
- supplier
- web-site user

Please note that on occasions we may process "special categories" of information about you. This is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

A college student applicant or former college students

Student – Admissions

Student – Admissions: The information we collect about you and why we collect it

As part of your admission to the College, we may collect your personal details including name, address, date of birth, email address, work assessment data, dates of attendance, exam/test results, religion, ethnicity, health information, doctor's details, behaviour record, sex-related information, genetic data, special needs details and biometric data (photograph).

We will use your information to manage and administer your education. This will include putting together class lists, for sending event invitations, for communicating with you, for dealing with admissions, for putting together reports and registers, to check entrance exam results, to allocate you to the correct classes for assessments, to make arrangements for exams or visits, to consider whether to offer places to students, to consider whether special provision or assistance is required for exams and visits and to be able to tell other colleges your attendance dates if you leave.

Student – Admissions: The legal basis on which we collect and use your personal information

The information is processed as part of our performance of contract with our main funders the Education and Skills Funding Agency (ESFA) and public interest task of providing education and training to you. The ESFA privacy notice and opt-in options will be provided to you on enrolment.

Where that information is special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

We keep an eye on how you use the College's equipment and computers and what websites you go on when you are browsing the internet at College. This is because we have legal obligations to protect you, and we also have a legitimate interest in making sure you are using our computer equipment correctly and that you are not looking at any inappropriate content.

If you want to browse the internet privately, you will need to use your own devices which are not linked to the College's network or internet connection.

Student – Administration and Teaching

Student – Administration and Teaching: The information we collect about you and why we collect it

As part of our administration of the College we may collect your personal and educational details including: your name, address, email address, date of birth, exam results, attendance, union membership, sports team membership, photo, work assessment data, dates of attendance, religion, ethnic origin, health records/conditions (inc. mental health), doctor's details, behaviour record, special needs details and sex-related data. From 2026/27 academic year we are using facial recognition technology for safeguarding, security, visitor management, site access, and learner protection.

As part of the delivery of education and training to you your work, support needs, behaviours, and progress will be assessed for the purposes of teaching you, measuring your achievement and supporting your progression. Where part of your course, we will identify work placement opportunities for you and share information with work placement employers.

Student – Administration and Teaching: The legal basis on which we collect and use your personal information

The information is processed as part of our performance of contract with our main funders the Department of Education (DfE) and public interest task of providing education and training to you. The DfE privacy notice guidance.submit-learner-data.service.gov.uk/26-27/ilr/ilrprivacynotice and opt-in options will be provided to you on enrolment.

Where that information is special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

We keep an eye on how you use the College's equipment and computers and what websites you go on when you are browsing the internet at College. This is because we have legal obligations to protect you, and we also have a legitimate interest in making sure you are using our computer equipment correctly and that you are not looking at any inappropriate content.

If you want to browse the internet privately, you will need to use your own devices which are not linked to the College's network or internet connection.

Facial Recognition Software

The college is committed to providing a safe, secure, and welcoming environment for all students, staff, contractors, and visitors. As part of our safeguarding, security and site management arrangements, the College uses Facial Recognition Technology (FRT) to help identify authorised individuals, manage access to designated areas, and enhance the protection of our college community on the Lillyhall campus. This privacy notice explains how and why we process biometric information through facial recognition systems and the rights of individuals whose data is processed.

Student – Finance

Student – Finance: The information we collect about you and why we collect it

In order to manage the financial affairs of the College we may collect and hold the following information about you: funding information, details of household income, bank details.

We will use your information to ensure your place is appropriately funded, you receive bursary and support funds you are entitled to and to pay/receive payment from you.

Student – Finance: The legal basis on which we collect and use your personal information

The information is processed as part of our performance of contract with our main funders the Department of Education (DfE) and Office for Students (OfS) and Higher Education loan administration and public interest task of providing education and training to you. The DfE privacy notice and opt-in options will be provided to you on enrolment.

Where that information is special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

Student – Marketing

Student – Marketing: The information we collect about you and why we collect it

For marketing purposes, we collect names, addresses, dates of birth, email addresses, telephone number, former school.

Where you have commenced an application process with us or previously studied at the College then we will send you information about the courses we provide and college recruitment events which may be of interest to you.

Student – Marketing: The legal basis on which we collect and use your personal information.

The information is processed on the basis of our public interest task of providing education and training services. 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.

Please refer to the end of the document for the sections listed below:

- **how long we keep your personal information**
- **use of Facial Recognition Software for safeguarding and security**
- **how we share your personal information**
- **how we transfer your personal information outside Europe**

- automated decisions we take about you
- your rights

Employer

Employer: The information we collect about you and why we collect it

We will collect your contact details, company information, apprenticeship levy status, training needs analysis and health and safety information.

We will use your information to provide education and training services to you, your staff, apprentices, and provision of work-placement opportunities for our students with you. We will use the information to support curriculum development and quality assurance activity.

We will use your information to provide you with marketing, supporting information and events on our education and training offer.

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

The information is processed as part of our performance of contract and compliance with our main funders the Department of Education (DfE) and Office for Students (OfS), and public interest task of providing education and training.

Where that information is special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

Marketing, supporting information and events on our education and training offer will be processed on the basis of our public interest task of providing education and training services. 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.

In addition, where you visit a building, we will collect and process the information set out in the “**Visitor to our College**” section.

Please refer to the end of the document for the sections listed below:

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- your rights

Member of staff or job applicant

See separate staff privacy notice.

Visitor to the College

Visitor to the College: The information we collect about you and why we collect it

As part of your visit to the College we store and use your personal details and information about your visit for the purposes of managing and operating the College.

We use CCTV at our buildings for the purposes of crime prevention, security, safeguarding, health, and safety and, accordingly, will capture imagery of visitors to the College. From the 2026/27 academic year we will use Facial Recognition software to support and enhance crime prevention, safeguarding, security and health and safety arrangements.

The college is committed to providing a safe, secure, and welcoming environment for all students, staff, contractors, and visitors. As part of our safeguarding, security and site management arrangements, the College uses Facial Recognition Technology (FRT) to help identify authorised individuals, manage access to designated areas, and enhance the protection of our college community. This privacy notice explains how and why we process biometric information through facial recognition systems and the rights of individuals whose data is processed.

Visitor to the College: The legal basis on which we collect and use your personal information

Except in the circumstances highlighted below, we process this information on the basis of our legitimate interests:

- we have a legitimate interest in wishing to interact with you to manage and operate effectively our College and to ensure that the College is safe and secure for all persons visiting; and
- to be able to do so, we need to understand details of who is in the building and to be able to communicate with them.

Where we are required by law to hold certain records, then we collect and hold those records to comply with that legal obligation.

Please refer to the end of the document for the sections listed below:

- **how long we keep your personal information**
- **use of Facial Recognition Software for safeguarding and security**
- **how we share your personal information**
- **how we transfer your personal information outside Europe**
- **automated decisions we take about you**
- **your rights**

Local stakeholders

Local stakeholders: The information we collect about you and why we collect it

In order to engage in our local community and stakeholders we maintain a contact list of people who may be interested in attending college events and promotional material. We collect your name, contact details, job role, and employer details.

In addition, where you visit a building, we will collect and process the information set out in the “Visitor to our College” section.

Local stakeholders: The legal basis on which we collect and use your personal information

We process this information on the basis of our public interest task in providing education and training services to our community.

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).

In addition, where you visit a building, we will collect and process the information set out in the “Visitor to our College” section.

Please refer to the end of the document for the sections listed below:

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- your rights

Supplier

We store and use your information for the purposes of managing our suppliers in respect of the supply of goods and services that our College may need.

Supplier: The information we collect about you and why we collect it

In order to engage and manage our suppliers, where you are a supplier (or where if it is a company, you are its representative) we collect and store your contact information and, where appropriate, your bank account details.

Where relevant to the service you provide, we will ask you to provide details of your occupation and your CV.

In addition, where you visit a building, we will collect and process the information set out in the “**visitor to our College**” section.

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

Except in the circumstances highlighted below, we process this information on the basis of our legitimate interests:

- we have a legitimate interest in engaging and managing our suppliers; and
- to be able to do so, we need to hold details of who those suppliers are.

Where we are required by law to hold certain records for health and safety purposes, then we hold those records to comply with that statutory obligation.

Where we hold your bank account details, we do so on the basis that it is necessary for us to perform our contract with you.

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- **how long we keep your personal information**
- **use of Facial Recognition Software for safeguarding and security**
- **how we share your personal information**
- **how we transfer your personal information outside Europe**
- **automated decisions we take about you**
- **your rights**

Website user

Website user: The information we collect about you and why we collect it

In running and maintaining our website we may collect and process the following data about you:

Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data, and other communication data.

Information provided voluntarily by you. For example, if you register to apply for a course.

Information that you provide when you communicate with us by any means.

Website user: The legal basis on which we collect and use your personal information

We use the information that we collect from you to provide our services to you. In addition to this we may use the information for one or more of the following purposes:

To provide information to you that you request from us relating to our products or services.

To provide information to you relating to other products that may be of interest to you. Such additional information will only be provided where you have consented to receive such information.

To inform you of any changes to our website, services or goods and products.

If you have previously purchased goods or services from us, we may provide to you details of similar goods or services, or other goods and services, that you may be interested in.

Website user: Use of Cookies

Cookies provide information regarding the computer used by a visitor. We may use cookies where appropriate to gather information about your computer in order to assist us in improving our website.

We may gather information about your general internet use by using the cookie. Where used, these cookies are downloaded to your computer and stored on the computer's hard drive. Such information will not identify you personally. It is statistical data. This statistical data does not identify any personal details whatsoever

You can adjust the settings on your computer to decline any cookies if you wish. This can easily be done by activating the reject cookies setting on your computer.

Please refer to the end of the document for the sections listed below:

- **how long we keep your personal information**
- **how we share your personal information**
- **how we transfer your personal information outside Europe**
- **automated decisions we take about you**
- **your rights**

Parents

Parents: The information we collect about you and why we collect it

We collect your name and contact details as next of kin for college applicants under the age of 19. We collect this to enable us to contact you in a case of emergency regarding your child and to enable support for your child in their learning programme with us.

In addition, where you visit a building, we will collect and process the information set out in the “**Visitor to our College**” section.

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

We hold this information on the basis of the vital interests of our students and the public interest task to support our students to achieve.

Where we are required by law to hold certain records for health and safety purposes, then we hold those records to comply with that statutory obligation.

Please refer to the end of the document for the sections listed below:

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- **your rights**

How long we keep your personal information

As detailed in the College's retention policy.

Use of Facial Recognition Software for safeguarding and security

We are committed to protecting the safety, welfare and security of pupils, staff, and visitors. As part of our safeguarding and site security arrangements, we use Facial Recognition Technology (FRT) to assist with identifying authorised individuals and preventing unauthorised access to college premises on the Lillyhall campus.

The facial recognition system captures an image of an individual's face, taken at enrolment or as a visitor, and converts it into a unique mathematical representation known as a biometric template. The system does not store a photograph for matching purposes but stores the biometric template required for identification. The system compares this template against templates previously enrolled within the system to verify identity. The College does not use the technology for continuous surveillance, profiling, or automated decision-making that produces legal or similarly significant effects.

The data collected will include:

- Name and identification details
- Facial biometric template
- Access records and timestamps
- Location of access points used

Biometric data is classified as "special category personal data" under UK GDPR.

We use facial recognition to:

- Support safeguarding arrangements
- Protect learners, pupils, staff, and visitors
- Control access to college buildings and restricted areas
- Verify the identity of authorised individuals
- Reduce the risk of unauthorised access
- Support investigation of security incidents where necessary

We process personal data under:

- Article 6(1)(e) UK GDPR: Public task (where applicable)
- Article 6(1)(f) UK GDPR: Legitimate interests (where applicable)
- Article 9(2)(g) UK GDPR condition applicable to processing biometric data

Where required by law, we will obtain explicit consent before processing biometric information.

Biometric templates are retained only for as long as necessary for the stated purpose. They will be securely deleted when:

- The individual leaves the college campus.
- Consent is withdrawn (where consent is the lawful basis); or
- The system is no longer required.

We implement appropriate technical and organisational measures to protect biometric data, including:

- Encryption
- Access controls
- Secure storage
- Audit logging
- Regular security reviews

The College recognises that many of our students are legally adults; however, we also have a duty of care towards all learners, including vulnerable adults. Any use of facial recognition technology will therefore be regularly reviewed to ensure it remains lawful, necessary, proportionate, and aligned with our safeguarding responsibilities.

How we share your personal information

We will share your personal information with third parties required to provide our services to you.

How we transfer your personal information outside Europe

We do not store or transfer your personal data outside Europe.

Automated decisions we take about you

We do not make automated decisions using this information.

Your Rights

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.
- to exercise your rights please contact the Data Protection Officer.

CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review and will update it from time to time to make sure it remains up-to-date and accurate. Up-to-date copies are available at www.lcwc.ac.uk. This Privacy Notice was last updated in August 2026.