

PRIVACY NOTICE for STUDENT SUPPORT SERVICES (Report + Support)

PRIVACY NOTICE DETAILS:

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| Authors | Head of Student Support and Development |
| Responsible Executive Group area | Deputy Director Academic |
| Related policies and documents | Data Protection Policy |
| Benchmarking | n/a |

The Glasgow School of Art Privacy Notice for Report + Support

The Glasgow School of Art is committed to looking after any information that you make available to us. We aim to be clear about what we will do with your data. This privacy notice explains when and why we collect personal information about you via our Report and Support system and how we will use this information including the ways we might share this with others. It also explains how we keep your information secure as well as the rights you have in relation to the information we hold about you.

Report and Support is an **online tool** developed by Culture Shift where staff, students and others can report issues relating to all forms of unacceptable behaviour, including race, inequality, discrimination and hate crime. It provides a clear, visible pathway to enable students and staff to report discrimination or harassment with the option to report anonymously. Report and Support also provides information about internal and external support, policies and procedures and allows for tracking and yearly reporting.

The headings below set out the main information we need to give to you.

The privacy notice will be regularly reviewed to make sure it contains the most up-to-date information. We will let you know if we make significant changes to this privacy notice.

If you have any questions about any of the information contained in this privacy notice then you can contact us at DataProtection@gsa.ac.uk

Who are we?

The Glasgow School of Art (referred to in this Privacy Notice as the “GSA”, “we”, “our” or “us”) is the Data Controller under the data protection legislation. This Privacy Notice sets out how we process the personal data we collect about you (referred to in this Privacy Notice as “you” or “your”).

What type of information do we collect about you?

You can make a report using Report + Support either anonymously or by making a report with your contact details.

If you choose to submit an anonymous report without sharing any identifying information about yourself then it may be that no direct action can be taken. We will use the anonymised data gathered to establish and monitor trends to better inform our decision making and to help us identify whether there are patterns of behaviour that we should address. We value all reports, including anonymous and may take action to consider them further wherever this is appropriate. In situations where reports remain anonymous, investigation may be limited. We will not take any action to identify individuals from anonymous reports but in order for us to be able to help you fully we encourage you to report with your personal details. Where third parties are named in anonymous reports, GSA would anonymise the data.

If you choose to submit a report with contact details rather than an anonymous report then we will process the following personal data about you:

- Your name
- Your status (i.e. student or staff)
- Your school/ department
- Your gender and age
- How many incidents you would like to tell us about
- The type of incident(s) (i.e. sexual harassment/ bullying/ hate crime)
- When and where the incident(s) occurred
- Whether you know the alleged perpetrator of the incident(s) or not; and
- Your e-mail address if you decide you want further contact with us about the matter

We will also process the names and other details of any third parties who are involved in the issues reported. Information relating to an individual's criminal convictions or past offences (including alleged offences) must not be included in any report. If it is included then we will delete this before the report is progressed.

Where you name a member of staff, student or third party within the report then this information may be used to start one of our formal processes if you choose to do so, or for the Glasgow School of Art to take action if we have safeguarding concerns. You do not have to provide information that will identify others involved in the incident if you do not want to.

What are the sources of the information we hold about you?

The only information we collect will be the information you have chosen to provide to us when you submit your report via the reporting tool.

How will we use your information?

The main purposes for which we will process the information you have provided are:

- To help us identify the best person for you to speak to in relation to your report and to provide you with appropriate support in respect of the incident and/ or concern;
- To allow us to take further action under the relevant GSA procedure, such as our complaints or disciplinary procedure;
- Compiling statistics or analysing trends from arising reports to inform our proactive and preventative work; and
- Meeting our duty of care to provide a safe environment for our staff and students.

Why do we need to process your personal data?

When you submit information using the Report + Support tool, you consent to us using this for the purposes set out in this notice. At any time, you may withdraw this consent and we will safely and

securely delete the information that you have provided to us. For more information about withdrawing your consent and other choices you have in relation to your information, see our [Data Protection](#) pages for further information.

It may also be necessary because the Glasgow School of Art has an obligation to ensure staff and students at the GSA are safe and receiving support for incidents and/ or concerns affecting them and to allow us to create a safe and supportive working and study environment.

We will not generally take steps such as investigating the report, initiating disciplinary proceedings or passing information to third parties in order to take the report further unless: (a) you have made a report with contact details and (b) you agree to this action. On rare occasions, the processing may be necessary to protect your vital interests or the vital interests of another individual. For example, because a report reveals a situation that needs the involvement of the emergency services or another external agency.

Use of Data

Whether you submit a named or anonymous report, the personal data you provide will be treated confidentially. The GSA does not share your personal data without your consent other than in the circumstances noted below:

If your physical or emotional wellbeing is at risk
If we have reason to believe you or another person are in danger of serious harm

In these circumstances, the GSA may share your personal data with Police Scotland, the NHS and other emergency services.

Where you name a member of staff, student or third party within the report then this information may be used to start one of our formal processes if you choose to do so, or for the GSA to take action if we have safeguarding concerns. You do not have to provide information that will identify others involved in the incident if you do not want to.

The Report + Support platform is hosted by a company called Culture Shift. Culture Shift may have limited access to the information on the platform as part of their provision of services. However, this will only be where GSA has granted access to Culture Shift and where they are acting on our instructions.

How long will we keep your information?

Where no action is taken, the information you provide will be retained in Report + Support for a period of four months, following the date the report is made and will then be erased. Where action is taken, the information provided will be retained in Report + Support for a period of twelve months, following the date the report is made, and will then be erased. Where personal data initially collected via the Report + Support tool is then used in connection with a formal process, then the data will be retained in line with the standard retention period for that process.

We may retain some anonymised data from your report in order to monitor our work in this area but you will not be identifiable through this information.

Who has access to your information and who will we share your information with?

We will always make sure that when we share information about you that we do this in line with the legislation and that we only share the minimum amount of information that is needed.

Access to personal information submitted through Report + Support will be strictly limited to a small number of GSA staff. Where the Glasgow School of Art carries out a formal investigation following a report we may share limited data about the report with certain GSA employees, for example the Head of the School or the Head of a Professional Services Department. We will aim to notify you in advance of sharing data with these GSA employees.

Report + Support is a third-party platform that has been developed by Culture Shift and they host the reporting tool for us. The GSA will

act as the Data Controller for the information you provide. We have an agreement in place with Culture Shift to make sure that they handle your data in line with our instructions and the data protection legislation. Culture Shift does not routinely have access to personal data contained in reports made using the Report + Support tool. However, there are times when it may be necessary for GSA to grant access to Culture Shift, for example, to investigate and remedy security incidents or to provide technical support to us. Such access will be coordinated on a case by case basis, and subject to strict controls.

There are certain circumstances where we may provide information about the matters raised in a report, including personal data, to third parties. This may include providing personal data about you without your consent. For example, where there is a legal obligation to provide information in respect of a court case. There may also be times where we share information provided to us with the police or other social care services.

Personal data included in a report may have to be disclosed by us in response to a Subject Access Request (SAR). This is where the individual who the data is about exercises their right under the law to request a copy of their personal data from us. A request may be made by the person submitted the report, the person to whom the complaint relates or by a third party referred to in a report. The GSA has policies and procedures in place to deal with these requests and will uphold its confidentiality obligations in respect of the report.

We are not obliged to comply with a request if this would mean disclosing information about another individual who can be identified from that information unless (1) the other individual has consented to that disclosure, or (ii) it is reasonable to comply with the request without the other individual's consent.

Where possible, given the nature of the information in the reports, we will try to avoid disclosing personal information other than that of the individual who has submitted the request, unless explicit consent to the disclosure is given by the other relevant individuals. However, there may be circumstances in which disclosure may enable the requestor to determine the identity of the person who

has made the report, e.g. if a specific event is referred to. In these cases, we will consider our response carefully and will endeavour to balance the requestor's right under data protection law to receive their information against the confidentiality obligations we have towards the person making the report to us.

What choices do you have in relation to your information?

Under data protection legislation you have certain rights in relation to the information we hold about you:

- To obtain access to, and copies of personal data we hold about you;
- To require us to stop processing your personal data if the processing is causing you damage or distress;
- To require us to stop sending you marketing communications;
- To require us to correct any personal data we hold about you that is incorrect;
- To require us to erase your personal data;
- To require us to restrict our data processing activities;
- To withdraw your consent to our data processing activities (without affecting the lawfulness of our processing before you withdrew your consent);
- To receive the personal data that we hold about you, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another controller; and
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Many of the rights above are not absolute so there may be times when you make a request to us and we are unable to meet it in full but if this is the case we will explain to you fully why we have not been able to do what you have asked.

How will we keep your information safe?

As mentioned above Report + Support is a third party platform developed by Culture Shift. You can find out more about how your information is kept safe by them in [here](#)

In addition, the Glasgow School of Art will make sure that any staff who are accessing the information you have provided have received appropriate training about their data protection obligations and their duty to keep the information about you safe.

Will we transfer your information outside of the EEA?

The information you provide will not be transferred out of the EEA.

Who is the GSA's Data Protection Officer?

If you have any concerns about how we handle your personal data then you can contact the GSA Data Protection Officer directly by e-mail DataProtection@gsa.ac.uk

How can I complain about your use of my information?

If you remain unhappy then you have a right to complain to the Information Commissioners Office:

ico.org.uk

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF