

## Complaints Privacy Notice

The University is committed to looking after any information that you make available to us when you make a complaint 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 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.

The headings below set out the main information we need to give to you. You can click on each heading to find out more detailed information.

The privacy notice will be regularly reviewed to make sure it contains the most up-to-date information. You should check our website to review a copy of our most recent privacy notice. If we make any significant changes to our privacy notice in the course of your complaint then we will contact you to let you know.

If you have any questions about any of the information contained in this privacy notice then you can contact us on [dataprotection@uws.ac.uk](mailto:dataprotection@uws.ac.uk)

### Who are we?

The University of the West of Scotland (referred to in this Privacy Notice as the “University”, “we”, “our” or “us”) is the Data Controller under the data protection legislation. This privacy Notice sets out how we process personal data about individuals who make a complaint to us under our Complaints Handling Procedure (referred to in this Privacy Notice as “you” or “your”).

### What type of information do we collect about you?

We will collect a variety of information about you that we will use to make your complaint file. For example:-

- Your name and address;
- Details about your programme of study; and
- Other personal information that you tell us as part of your complaint.

In some cases we may also hold special category data about you such as:-

- Information regarding any medical conditions or disabilities you may have that you have provided to us when you have made your complaint
- Information about you racial or ethnic origin, religion or similar beliefs or your sexual orientation if you have provided this to us as part of your complaint.

If we are processing sensitive personal information about you then we will make sure that we will have in place additional safeguards when using that data. In most cases, you have the option whether or not to provide this information and we will not share this with third parties unless you tell us we can.

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

We may collect information about you from the details that you provide to us in your initial complaint form and also additional information we may ask you to provide during our investigation of your complaint. We may also collect information about you from Schools or professional support departments if they have information that is relevant to the issues you have raised.

### **How will we use your information?**

We will use the information we hold about you to investigate and make a decision about the complaint you have made to us.

We may also use the information so that we can demonstrate to the Scottish Public Services Ombudsman (SPSO) that we have followed our complaints procedure if you escalate your complaint to them.

### **Why do we need to process your personal data?**

Under the General Data Protection Regulation we are required to identify our 'lawful basis for processing' the information we hold about you.

As a higher education institute, we are required to consider and records all complaints that are made to us in line with the SPSO's Model Complaints Handling Procedure. Therefore, we consider that we are performing a public task when we are processing information about complaints that are made to us and we use this as our lawful basis.

Where it is necessary to process special category data as set out above we will seek your consent to do so.

### **How long will we keep your information for?**

We keep your complaint file for six years after the date of the last action on the file and then it will be securely destroyed.

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

The information you provide to us will only be accessed but the University staff who need to see this to review your complaint.

If you take your case to the Scottish Public Services Ombudsman (SPSO) we may share your complaint information with them as part of their investigation.

### **What choices do you have in relation to your information?**

Under the 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;
- 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. You should also be aware that where our processing of your information relies on your consent and you then decide to withdraw that consent then we may not be able to provide all or some aspects of our services to you.

More detailed information about the rights you have any how you can make a request can be found [here](#).

### **How will we keep your information safe?**

All personal information we hold about you is held on our secure servers. If we hold paper records about you then we make sure that staff are trained about how they should handle this information and make sure it is stored securely.

- Firewall  
A firewall is a network security device that monitors incoming and outgoing network traffic and decides whether to allow or block specific traffic based on a defined set of security rules.

Rules are designed to provide a balance between strong security and allowing staff and students appropriate access to teach and study.

- Patch Management  
Patch management is a strategy for managing security fixes or upgrades for software applications and technologies. A patch management plan helps the organisation handle these changes efficiently and in a controlled and fully tested manner. We patch our devices and systems as part of a 30 day rolling process. Critical security patches are installed as required.
- Access Control  
Access control is a security technique that can be used to regulate who or what can view or use resources in a computing environment.

Access to files and folders and connections to computer networks is based on user credentials, login and password.

- Event/Network Monitoring  
The UWS network is constantly monitored for anomalous behaviour which would be associated with cyber-attacks. Event monitoring tools help us to monitor details of

activity on the network and allow us to highlight areas of concern for further investigation. Identifying anomalies quickly is vital to securing the confidentiality, integrity and availability of data on our network.

- **Anti-Virus**

Anti-Virus protection is installed on all endpoint devices and updated at least daily with the latest vendor updates.

Antivirus software is designed to prevent, detect and remove malware infections on individual computing devices, networks and IT systems.

Our antivirus software programs include real-time threat detection and protection to guard against potential vulnerabilities as they happen, as well as system scans that monitor device and system files looking for possible risks.

### **Will we transfer your information outside of the EEA?**

No, the information you provide will not be transferred outside of the EEA.

### **Who is the University's Data Protection Officer?**

The Head of Legal Services is the UWS Data Protection Officer. If you have any concerns about how we handle your personal data then you can contact the Data Protection Officer directly by e-mail [dataprotection@uws.ac.uk](mailto:dataprotection@uws.ac.uk) or by post at Data Protection Officer, University of the West of Scotland, Legal Services, High Street, Paisley, PA1 2BE.

### **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:

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

e-mail: [casework@ico.org.uk](mailto:casework@ico.org.uk) and telephone 0303 123 1113