

Privacy Statement for Benefactors and Adult Dependants

Student Awards Agency Scotland (SAAS) is an Executive Agency of the Scottish Government giving financial support to eligible Scottish domiciled students undertaking a course of higher education. SAAS is the Controller for your personal information.

Student Awards Agency Scotland
Saughton House
Broomhouse Drive
Edinburgh
EH11 3UT

SAAS is required by law to provide you with information about how and why we need to collect your personal information.

This privacy statement relates to the personal information collected and provided in connection with a student's application for assessment for student financial support

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What Personal Information do we collect

We collect your personal information directly from the student who has provided your information as part of their application. We may also collect information directly from you. Where we collect information directly, we will most likely ask you to fill in and sign a further form.

Benefactors

SAAS collects the following personal information:

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- Personal Information: Title, name, address, national insurance number and relationship to student.
- Employment Information: Employment status, types of employment, dates of employment, where employed.
- Financial Information: Amount of income, type of income, amount of maintenance paid out of the household (if applicable)
- Residency Information: Places of residence in Scotland, dates of residence in Scotland, Places of residence out with Scotland, dates of residence out with Scotland.

SAAS may not ask you for all this information, it will depend on whether the student making the application has asked for income-assessed support or whether they have answered questions in their application that require further information from you as the benefactor. An example could be where questions have been raised about meeting residency criteria.

Adult Dependand:

- Personal Information: Title, name, address, date of birth and relationship to the student
- Employment Information: Employment status
- Financial Information: Amount of income, type of income

Documentation and Evidence

To support an application we may also request evidence to confirm the circumstances of the household and income declared. This can include copies of documents such as passport, birth certificate, marriage certificate, council tax statement and P60. The documents we may need will depend on the type of funding a student has applied for and the information provided in support of their application.

The information that we gather and hold may also be used for the prevention, detection, investigation and reporting of possible criminal conduct. Please see the section below for further information.

Why we collect your information and what we use it for:

We collect, hold and process information about you in order to:

- confirm household income to accurately assess a student's entitlement and provide the maximum support available in relation to Young Student's Bursary (YSB), Independent Students' Bursary (ISB), student loan for living costs and living-cost grants and Adult dependants grant.
- Assess residency status of benefactors to determine students eligibility for support.

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- Accurately respond to your questions and optimise the customer service we provide to you.
- Verify who you are if you were to contact us, to contact you regarding a student's application for support and to meet Data Protection requirements in relation to your rights under the Data Protection Act.
- Appropriately manage public funds, including crime prevention, detection, investigation and reporting.
- Share information for the purpose of crime prevention, detection, investigation and reporting with Police Scotland and other organisations.
- Undertake statistical analysis
- Monitor the performance of the student finance system and to develop future policies or initiatives.

We collect, hold and process your personal information because we need to do this as a government body who is tasked with ensuring students are provided with funding they are entitled to. If your personal information is not provided, the student may miss out on grants and bursaries that they may be entitled to receive.

Our functions are outlined in [legislation](#). This is a lawful basis for processing as outlined under Article 6 of DPA, 6(e):

- the processing is necessary for the performance of a task carried out in the public interest; or
- in the exercise of official authority vested in SAAS

Student who study out-with Scotland

SAAS provides the personal and financial information of benefactors where students are studying out with Scotland (England, Wales and Northern Ireland) to the Student Loans Company (SLC). This information is used by the SLC to assess entitlement to bursaries and scholarships provided by these universities and colleges. SAAS processes this information as a data processor. Further information about these bursaries can be found on the SLC [website](#).

Prevention, detection, investigation and reporting of crime

SAAS is under an obligation to protect the public funds within our control and we will not tolerate criminal conduct, whereby individuals attempt to obtain access to funding which they are not entitled to or eligible for. We are committed to deterring, preventing and detecting criminal conduct and will investigate and, where appropriate, report cases to the Crown Office and Procurator Fiscal Service (COPFS) for prosecution. Our Counter Fraud Policy and Counter Fraud Strategy can be found on our website under 'CLASS 4: What the Authority spends and how it spends it' under [classes of information](#)

SAAS Counter Fraud Team

SAAS has a dedicated Counter Fraud Team who undertake proactive prevention and detection exercises to identify possible fraud. We also have a team of Accredited Counter Fraud Specialists and investigators trained by Police Scotland who gather evidence, investigate and report cases of criminal activity for prosecution.

We will investigate ALL instances where criminal conduct may have taken place, or report it to the appropriate organisation to investigate further e.g. Home Office, Student Loans Company, Department of Work and Pensions, HM Revenue and Customs, Police etc.

During both proactive and reactive investigations, SAAS will request information from, and provide information to, other organisations for the purposes of ensuring that students remain eligible for support and that the level of support awarded is correct. Equally, other organisations will request information from SAAS for the purposes of the prevention, detection, investigation and reporting of crime.

How do we keep your information secure

We are committed to protecting the privacy and security of the information submit to us.

We protect the transmission of your information to us by using Transport Layer Security (TLS).

The transmission of information over the internet is generally not completely secure. Although we will do our best to protect personal information, we cannot guarantee the security of personal data transmitted.

Any transmission is at the data subjects own risk.

When we receive personal information, we have procedures and security measures in place to keep your data secure.

Where we share personal information with third parties through data sharing agreements or for legal/statutory requirements, we make sure they have the appropriate security policies and procedures in place.

Although your information is provided by the student applying for support we will not disclose your personal information or circumstances with the student once this information is provided to us.

What if your information changes?

If the financial information that has been provided about you is incorrect then you must inform us straight away and provide us with the accurate information. This can be done by phoning us on 0300 555 0505 or use our [enquiries form](#).

You should also contact us with any updates to your personal details so we have the most up to date information in case we need to contact you regarding the student's application.

Retaining your personal information

SAAS have a requirement to retain benefactor and adult dependant information the following reasons:

- A student can apply for support throughout their lives and can appeal or make legal challenges to funding decisions;
- Appropriate management of public funds;

For these reasons we are required to keep your personal information for an indefinite period of time.

SAAS will review the requirement to retain personal information for these purposes by the end of 2019.

Our Retention and Disposal Schedule can be found on our website under 'CLASS 5: how the authority manages its human, physical and information resources' under [classes of information](#)

Your Rights

Data Protection legislation provides the following rights for individuals:

1. The right of access
2. The right to rectification
3. The right to erasure
4. The right to restrict processing
5. The right to data portability
6. The right to object
7. Rights in relation to automated decision making and profiling

Further information about your rights can be found on the Information Commissioner's [website](#)

[How to request personal information](#)

You have a legal right to access the personal information SAAS holds about you. This is known as a Subject Access Request (SAR) and we aim to process them within 30 days.

Subject Access Requests must be made in writing and anyone making an oral request will be asked to complete a [subject access request form.pdf](#). More information about making subject access requests is contained in the form.

How to make a request in relation to other individual rights.

If you wish to make a request to change, delete, restrict processing or object to the processing your personal information, then any such request can be made verbally or in writing.

We will always consider your request to make changes to your personal information and contact you regarding our response within 30 calendar days.

All requests should be sent to :

Data Protection
Student Awards Agency Scotland
Saughton House
Broomhouse Drive
Edinburgh
EH11 3UT
Email: [SAAS Data Protection Mailbox](#)

Telephone: 0300 555 0505

Complaints

If you are not satisfied with the response received to your request by SAAS, in the first instance you should contact SAAS for a review of the decision. This can be done by writing to the Data Protection Officer (DPO) using the contact details above.

If an individual is still dissatisfied, they have the right to contact the Information Commissioner's Office, the independent body overseeing compliance with the Act and should be directed to the [ICO website](#)

Call Recording and Digital Media

Call recording

As part of our commitment to provide the best possible service to our customers we record telephone calls in our contact centre. This helps us to identify ways that we can provide you with a better service:

We record calls for:

- Staff training purposes, helping us to improve the quality of our customer services and to ensure the information we provide is consistent and accurate
- Reporting on the types and numbers of enquiries we receive
- Keeping an accurate record of your call, which may be needed to support any transactions that take place over the phone and/or if there are any disputes
- The gathering of evidence to assist in the investigation, and reporting of criminal conduct or attempted criminal conduct.

We understand your personal information is important and we are committed to protecting your privacy. We can actively retrieve call recordings for 500 days from our system after which point they are archived. Further information on call recording can be found in our Call Recording Policy.

Social Media

Our social media sites are public and can be accessed by anyone. Any personal information you chose to share via social media sites could be assessed by the wider public. We advise that you do **not** share personal information in public areas of social media.

Changes to this Privacy Notice

This privacy notice can also be found on the SAAS website. We keep all our privacy notices under review. This privacy notice was last updated on 22 May 2018.