

Information when requesting consent

It is possible to store study attainment data on the competence acquired in liberal adult education in the National Registry and Data Transfer Service for Study Rights and Completed Studies.

August 1, 2022

The Adult Education Centre of Jyväskylä has decided to offer those participating in certain courses the opportunity to store study attainment data in the National Registry and Data Transfer Service for Study Rights and Completed Studies (Koski service).

Storing study attainment data on education aims to achieve the students' best interests by making their skills and competence transparent. The data on liberal adult education studies stored in the National Registry and Data Transfer Service for Study Rights and Completed Studies is primarily available only for access by the student through their MyStudyinfo service. Students may, by using the service and with their consent, share data stored in the Koski data repository with third parties.

Study attainment data are stored only if the students wish to do so and give their consent in writing. It is not a prerequisite for attending the education that consent should be given or study attainment data be stored. The assessment criterion used in *The Adult Education Centre of Jyväskylä* is pass/fail. If a student's study attainment is assessed to be a fail, such data is not stored in the Koski data repository even if consent for the transfer of the data has been given.

Where students have given consent, the educational institution must take the following measures:

- Assess the student's study attainment no later than when the the course or educational entity has been completed
- Transfer the student study attainment data to the National Registry and Data Transfer Service for Study Rights and Completed Studies
- Permanently record the student's consent

Data processed when storing data on study attainments

With the consent of the student, *The Adult Education Centre of Jyväskylä* stores the following data in the National Registry and Data Transfer Service for Study Rights and Completed Studies:

1. the title of the education and its scope;
2. the end date of the education;
3. assessment of competence.

Consent is given by the students, or, in the case of students who are minors, consent is given by the students' parents or other custodian, for storing data when they register or at the latest when they begin their studies, as further instructed by the provider of the educational institution.

In addition to the information stored by *The Adult Education Centre of Jyväskylä*, the Finnish National Agency for Education stores the information required for the student's national learner ID in the role of the controller of the Koski service. The national learner ID is a permanent identifier issued by the Finnish National Agency for Education, which is used to identify a person in the services of the Finnish National Agency for Education. Provisions on the national learner ID are laid down in the Act on the National Register of Students and Qualifications (section 3). When forming the national learner ID, the following information is stored in the national learner ID register:

1. Name
2. National learner ID
3. Personal identity code
4. Nationality
5. Gender
6. Mother tongue
7. Contact details

The student's personal identity code updates up-to-date information on the student's citizenship, gender, mother tongue, municipality of residence and contact details from the Digital and Population Data Services Agency. Where a student has no personal identity code, the educational institution stores the person's nationality, gender and mother tongue in the learner ID register.

The City of Jyväskylä provides the opportunity to store study attainment data on competence acquired in liberal adult education as August 1, 2022 in the Koski service.

Data controllers

As joint controllers of the National Registry and Data Transfer Service for Study Rights and Completed Studies, the Finnish National Agency for Education and the providers of educational institutions for liberal adult education are responsible for the data on non-formal liberal adult education. The contact email of the Finnish National Agency for Education in matters related to the register is [koski\(at\)opintopolku.fi](mailto:koski(at)opintopolku.fi) and the privacy policy contains up-to-date information on the Data Protection Officer of the Finnish National Agency for Education (in Finnish and Swedish): <https://opintopolku.fi/wp/tietosuojaseloste/koski-palvelun-tietosuojaseloste/>

The data protection officer of *the City of Jyväskylä* is *Liina Kuusela*, liina.kuusela@jyvaskyla.fi, phone 050 4314315.. The data controller of *The Adult Education Centre of Jyväskylä* is responsible for storing the data in the National Registry and Data Transfer Service for Study Rights and Completed Studies and that the data are correct and up-to-date.

What is the National Registry and Data Transfer Service for Study Rights and Completed Studies?

The National Registry and Data Transfer Service for Study Rights and Completed Studies is a national data repository. The information contained in it is described in the privacy policy of the registry.⁵ Provisions on the Koski data repository are laid down in chapter of the Act on National Registers of Education Records, Qualifications and Degrees (884/2017). As joint controllers of the National Registry and Data Transfer Service for Study Rights and Completed Studies, the Finnish National Agency for Education and the providers of educational institutions for liberal adult education are responsible for storing the study attainments in non-formal liberal adult education. The Finnish National Agency for Education is responsible for maintaining the National Registry and Data Transfer Service for Study Rights and Completed Studies.

The purpose in storing studies in the National Registry and Data Transfer Service is to make the non-formal competence acquired in liberal adult education visible. Non-formal, non-qualification studies in liberal adult education provide students with a wide range of competence needed in working life and leisure activities. The Koski data repository helps in the identification and recognition of such competence. As a rule, the study attainment data relating to liberal adult education stored in the National Registry and Data Transfer Service for Study Rights and Completed Studies are not used for executing out statutory official duties, improving the efficiency of administration, developing and making decisions on liberal adult education, or in the evaluation, statistical data, monitoring and research of liberal adult education. The information in the

registry is available for access by the student through their MyStudyinfo service (<https://studyinfo.fi/omaopintopolku/>).

Under the Act on National Registers of Education Records, Qualifications and Degrees, the providers of educational institutions as referred to in the Act on Liberal Adult Education shall store in the Koski data repository data on those study attainments that have been passed if the provider of the educational institution has decided to enable the storage of such information in the Koski data repository for students participating in such education and the students give their consent for storing the data. *The City of Jyväskylä* determines which education and courses and from when onwards it introduces the opportunity for data storage.

Data disclosure and students' opportunities to manage information

The provisions on the disclosure of information laid down in the Act on National Registers of Education Records, Qualifications and Degrees (884/2017) do not apply to the study attainment data in liberal adult education stored in the National Registry and Data Transfer Service for Study Rights and Completed Studies. This means that information cannot be disclosed under the Act on National Registers of Education Records, Qualifications and Degrees, unless the students themselves do so. In the MyStudyinfo service, students can review their own educational information and send information to third parties if they wish to do so.

This is done in the MyStudyInfo service in such a way that the student creates in the MyStudyinfo service and sends the link to a selected person. By activating (clicking) the link, the recipient can see the educational information to which the student may select given study attainments from the data set in the Koski data repository and send the link to an educational institution or an employer, for example. The student can also deactivate the link in the service, which then affects the disclosure of the data. In practice, by removing the link the student ensures that the third party no longer has access to the information disclosed.

If students wish to make use of their study attainment data at another educational institution, they must personally ensure that the information is disclosed, as guidance counsellors do not automatically have the right to examine students' study attainment data stored in the Koski service. In addition, students can still request a separate certificate from the educational institution on the education completed in liberal adult education.

Students may also give their consent for the disclosure of information to a third party with whom the Finnish National Agency for Education has an agreement on the transfer of data. Under the Act on National Registers of Education Records, Qualifications and Degrees, if consent is not granted for disclosure, the information is available only to the student, the provider of the educational institution that stores the information and the Finnish National Agency for Education. However, in certain situations, the authorities have the right to access information contained in the Koski service under other legislation. For example, under the Statistics Act (280/2004), Statistics Finland, and, under the Act on Student Financial Aid (65/1994), the Social Insurance Institution, have the right to access the same information in the Koski service that the provider of the educational institution could issue them.

In addition, service providers (processors of personal data) participating in maintaining and developing the Koski service have access to the personal data contained in the Koski service in information management tasks related to the duties of the controller of the Finnish National Agency for Education.

Retention period of personal data

The basic premise is that information on study attainments acquired in liberal adult education are stored permanently in the National Registry and Data Transfer Service for Study Rights and Completed Studies. However, by withdrawing their consent for whatever education at any given time, students may, if they wish, request that the data be deleted. The withdrawal of consent is made by notifying the Finnish National Board of Education of the withdrawal of consent through the MyStudyinfo service. If the study attainment has not been used for purposes such as the identification and recognition of competence in an educational institution or for jobseeking or receiving benefits, the Finnish National Agency for Education commences the withdrawal of consent process once it has received the measures for deleting the data. If the study attainment has already been used for any of the purposes mentioned above, it can no longer be deleted. However, the national learner ID and the identifying information on the basis of which the national learner ID was issued are always kept permanently. In addition, the Finnish National Agency for Education notifies the provider of the educational institution of the withdrawal of consent. The provider of the educational institution then records the information on the withdrawal.

Data subject rights

Students have the right to receive information on the processing of their personal data and to see the personal data stored in the National Registry and Data Transfer Service for Study Rights and Completed Studies (Data Protection Regulation, Article 15), the right to correct the data entered in the application (Article 16) and the restriction of the processing of personal data (Article 18). In addition, students have the right to object to the processing of data in accordance with Article 21 of the Data Protection Regulation and to withdraw their consent pursuant to Act on National Registers of Education Records, Qualifications and Degrees (884/2017) and possibly the right to delete data pursuant to Article 17 of the Data Protection Regulation. In addition, registered students have the right to lodge a complaint with the Data Protection Ombudsman. The same rights apply to the parents or custodians of students who are minors. Further instructions for the implementation of the rights can be found in the privacy policy, under the section 'Read more'.

Read more

- Information for data subjects: <https://www.jyvaskyla.fi/info/yhteys/tietosuoja>
- National Registry and Data Transfer Service for Study Rights and Completed Studies in the Finnish National Agency for Education's online service (in Finnish and Swedish): <https://www.oph.fi/fi/palvelut/koski-tietovaranto>
- Privacy policy for the National Registry and Data Transfer Service for Study Rights and Completed Studies (Koski service) (in Finnish and Swedish): <https://opintopolku.fi/wp/tietosuojaseloste/koski-palvelun-tietosuojaseloste/>
- National learner ID Register Privacy Policy (in Finnish and Swedish): <https://opintopolku.fi/wp/tietosuojaseloste/oppijanumeronrekisterin-tietosuojaseloste/>
- Act on National Registers of Education Records, Qualifications and Degrees (884/2017) (in Finnish and Swedish): <https://www.finlex.fi/fi/laki/ajantasa/2017/20170884>
- Act on Liberal Adult Education (632/1998) (in Finnish and Swedish):