

# **Student Privacy Notice**

| Approved by:                  | Effective date: | Next review: |
|-------------------------------|-----------------|--------------|
| Governance and Legal Services | March 2024      | March 2026   |

### **Privacy Notice Statement**

The student Privacy Notice provides a framework to ensure the University meets its obligations under the UK General Data Protection Regulation and the Data Protection Act 2018.

### Who needs to know about this Privacy Notice

This privacy notice applies to all the processing of personal data belonging to students and prospective students carried out by the University, including processing carried out by joint controllers, contractors and processors.

## **Purpose of the Privacy Notice**

The University sets out how it is to comply with data protection legislation guided by the six data protection principles, which require that personal data is:

- 1. Processed fairly, lawfully and in a transparent manner
- 2. Use only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
- 3. Adequate, relevant and limited to what is necessary
- 4. Accurate and, where necessary, up to date
- 5. Not kept for longer than necessary
- 6. Kept safe and secure

In addition, the accountability principle requires us to evidence our compliance with the above six principles and ensure we do not put individuals at risk because of processing their data. Failure to do so can result in a breach of legislation, reputational damage or financial implications due to fines. To meet our obligations, we put in place appropriate and effective measures to comply with data protection law.

This Privacy Notice sets out the measures the University is committed to taking and what every staff member at the University will do to ensure compliance with the relevant legislation.

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# 1. Introduction

1.1 This Privacy Notice explains the types of personal data we may collect and how we use it. It explains how we store and manage that data and keep it safe.

1.2 This Notice applies to you if you have ever applied, enrolled or registered to study with the University. It includes undergraduate, postgraduate, research students and apprentices, together with students on short courses.

1.3 We may collect additional information for some students and process it differently. These include students on professional courses in the Faculties of Health & Wellbeing, Education and apprentices.

1.4 We want to inform you fully about your rights and how the University uses your data. A <u>one-page summary document</u> is available for reference.

1.5 We hope the following sections will answer any questions you have. If not, please <u>do contact us.</u>

1.6 We will need to update this <u>Privacy Notice</u> from time to time and will notify you of any significant changes. You are welcome to come back and check it whenever you wish. We welcome any comments on this Privacy Notice and will take your comments into account when updating the Notice.

# 2. What personal information do we collect about you?

2.1 As soon as you contact us, including through UCAS, you enter into a contract with us. As part of the contract, we will need to process your personal data. In order to do so, we create a record in your name. During your time studying with us, we add information to your record about your study and your contact with us. We may process the following information about you:

- Your name, address and contact details, including email address and telephone number, date of birth and gender
- The terms and conditions of any courses you enter with the University
- Details of your qualifications, including information provided on any applications made to the University
- Information about your marital status, next of kin and <u>trusted contacts</u>
- Information about your nationality
- Record of course attendance, including sickness absence and other reasons for leave
- Details of any disciplinary or grievance proceedings in which you have been involved, including any warnings issued to you and related correspondence
- Assessments of your performance, improvement plans and related correspondence

- Details of accidents, incidents and near misses, related to University activities, that you have either reported of have been involved in
- <u>Equal opportunities monitoring information</u>, including information about your ethnic origin, sexual orientation, health and religion or belief
- Any disability/access <u>requirements</u> or medical issues
- Any information you provide to access specialist support/services
- Bank details and/or payment card details
- Visual images/photographs
- Computing and email information including login details, network access and library usage
- For international students, we may collect additional information on visa details and date of entry to the UK and/or government issued identification numbers.

2.2 In some circumstances, we may hold information relating to criminal offences where it is a requirement of a course you have undertaken. You can find more information about how we process this data in the Use of Special Category Data of Students Privacy Notice found <u>here</u>.

# 3. How do we collect your information?

From your first contact with the University you will provide us with information such as your name and other personal identifiers. However, not all of the personal information the University holds about you will always come directly from you. Apart from the data that you provide to us, we may also process data about you from a range of sources.

## **3.1 Information we automatically collect**

3.1.1 We automatically collect information about your participation in learning and assessment activities and your use of the virtual learning environment (Blackboard) and the library. We automatically collect information about assessment activities such as coursework and examinations.

3.1.2 We will also add to your record any activities you conduct on our website. We may automatically collect technical information when you browse our websites. We give further details about this in our <u>Privacy and Cookies Policy</u>.

3.1.3 Should you use your University e-mail address and other Microsoft Office 365 services, we will collect data about your use of the service.

## **3.2 Information we receive from third parties**

3.2.1 We may receive information about you from third parties.

3.2.2 UCAS (Universities and Colleges Admissions Service) collects your personal information to manage and support your application to higher education. It is shared with your prospective universities.

3.2.3 We may contact the Higher Education Statistics Agency (HESA) or other educational institutions to confirm the qualifications you obtained. We may check your inclusion in a previous HESA or Individual Learner Record (ILR) return.

3.2.4 Should you have your fees paid by a loan through the Student Loan Company (SLC), another funding authority or government agency, such as by a loan or grant, we will receive information from the funding provider. If another organisation pays your fees, this organisation may provide some information about you to us. Further information should be available to you in the relevant privacy notices of these organisations.

3.2.5 Should part of your studies require you to undertake a placement, we will process the information we receive from the placement provider.

3.2.6 If you are studying and registered with a collaborative partner institution, we may receive information about you from our partner.

- 3.2.7 We may enhance our records with third-party data if you are not currently studying. It is to ensure we have up-to-date contact details for you and offer you relevant communications.
- 3.2.8 When we obtain personal data about you from third party sources, we ensure the third party has lawful authority to provide us with the data.

## 3.3 Information you give to us

3.3.1 You may give us information about "special categories" of data, including your racial or ethnic origin, religious beliefs, physical or mental health, or sexual orientation. We use your "special categories" data for activities, including monitoring equal opportunities and informing research. We use it to identify if you need support and provide relevant opportunities. We use it so we can take account of the views of students with specific protected characteristics.

3.3.2 You might have to give us information about any criminal convictions. You must provide it if you are on a course that requires placements where there are vulnerable groups or leads to professional registration. It is because the safeguarding of vulnerable groups is a legal requirement.

3.3.3 You will give us further personal information when you use our services, for example, the library, IT, support and disability services, the bookshop, the Chaplaincy and career development. We may give you more information about what we do with your personal data when you start to use the service.

3.3.4We might collect bank and credit card information for payments of fees and accommodation charges. We also collect bank account information to pay bursaries and student travel expenses.

# 4. How do we use your information

4.1 We collect and process a broad range of your personal data to deliver our services and support you. We use this personal data to manage our operations effectively, and to meet our legal requirements.

4.2 We have a commitment to the data protection principles of good practice for handling information. We will only transfer data within the University on a 'need-to-know' basis. We do this to provide educational, support and other services to you.

4.3 We use your data to improve the wider student experience, and the quality of teaching and learning. We may contact you to carry out research to do with the student experience and we may use an external agency to do the research on our behalf.

4.4 We use the equal opportunities data (which is called special category data) you provide to us for monitoring purposes. We use this data to ensure we take account of the views of students with specific protected characteristics. We may provide specific support to student groups with shared characteristics. We may use this data to identify if you need support and to provide you with relevant opportunities. We use information about any disabilities and special requirements you tell us about. This is to make reasonable adjustments and other provisions for your study.

4.5 The Strategic Information Technology System (SITS), is the student record keeping system used at the University and contains data for current and former students. SITS is where we create and maintain student records.

4.6 Students who started a course prior to 2022 will also have data stored on Agresso QL Students, known as QL. This is the student records system used prior to SITS and contains student data for students prior to 2022.

4.7 The purposes for which we may use personal data (including special category personal data) we collect include:

4.7.1 Administration matters including:

- recruitment and admissions
- arranging for the issue of a CAS for students applying for a student (formerly Tier 4) visa and communicating with the UKVI over immigration status
- providing library, IT and information services

4.7.2 Academic matters, including:

- the provision of our core teaching, learning and research services (e.g., registration, assessment, attendance, managing progress, academic misconduct investigations, certification, graduation)
- maintaining student records

4.7.3 Providing professional support services, including:

- providing student support services (e.g., through personal tutors and Schools, Disability and Additional Learning Support, Career Development, Student Wellbeing)
- improving our offer of education
- monitoring equal opportunities
- safeguarding and promoting the welfare of students
- ensuring students' safety and security, including recording and reporting accidents, incidents and near misses
- managing student accommodation
- managing the use of social media
- managing car parking on campus
- administering the financial aspects of a student registration (e.g., fees, rents, debt collection, scholarships and bursaries), including assessing eligibility for bursaries and scholarships
- dealing with enquiries and complaints
- organising and maintaining placements as part of your studies
- dealing with disciplinary actions
- conducting research and statistical analysis to improve our efficiency and effectiveness as a higher education provider
- conducting audits (e.g., to ensure compliance with our regulatory and legal obligations)
- providing operational information (e.g., providing IT support, information about building and campus closures, access restrictions on campus, securing and promoting health and safety)
- promoting our services (e.g., student exchanges or other events happening on and off campus)
- preventing and detecting crime
- managing health and safety
- organising graduation ceremonies.

4.8 We may contact you about your studies or for administration and support purposes. It could be by e- mail, letter, Blackboard, Teams or telephone.

4.9 We use Information about any declared disabilities and specific requirements to inform the provision of reasonable adjustments.

4.10 You may submit "special category" information to us to be processed for the following purposes:

- You may need to submit medical evidence to support an application for funding or to support an extenuating circumstances submission.
- You may submit data about your religion relating to the timing of an examination.
- You may submit medical evidence to enable us to produce a learning support plan or a negotiated learning plan.
- You may provide medical evidence as part of an appeal or complaint.

We only use this information for the purpose for which you provided it.

4.11 We keep records of you participating in learning activities, including monitoring your attendance, as part of your studies. We monitor attendance to ensure our students' proper engagement and assist with international student visas. We will require you to participate in an electronic recording of attendance.

4.12 We may record educational activities in which you take part. We make the recording for the legitimate purpose of providing online access to lecture content to deliver a learning experience for our students. You can opt out and request an edit of recordings. Except in agreed exceptional circumstances, we do not permit students to record educational activities other than for personal study purposes.

4.13 We provide further information on the purposes we use your information for in Section 5.

# 5. The legal basis we use to process your data

Data protection law sets out reasons for collecting and processing your personal data. In this section, we outline the legal bases the University uses.

## **5.1 Contractual obligations**

5.1.1 When you become a student at the University, you enter into a contract with us so that we can provide you with an education. This also apples if you live in our residential accommodation as by doing so, you are also entering into a contract with us so that we can provide you with accommodation.

5.1.2 We will then need to process your personal data in order to comply with our contractual obligations. For example, this may include:

- At the application stage to correspond with applicants regarding the next steps in the application process
- At the registration stage to provide you with accommodation, facilities and services central to your studies. For example, library and computing access.
- For the administration of job applications and employment contracts where you are employed through UNITEMPS.
- The processing and recovery of University fees, including course and accommodation fees.

5.1.3 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(b):

(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract."

## 5.2 Legal compliance

5.2.1 We may need to process your data in order to ensure we are complying with relevant laws and legislation.

5.2.2 We will need to process your personal data under this lawful basis for the following reasons:

- Monitoring to ensure we meet our statutory obligations, including those related to diversity, equal opportunities and health and safety.
- The assessment and provision of support services to students including the provision of disability support services and, learning and research support skills services.
- Compliance with law enforcement and regulatory bodies such as passing on details of those involved in fraud or criminal activity.
- The evaluation of academic assessments and coursework where the University has a legal obligation under the Office for Students Requirements relating to entry on the Register of HEI Providers.
- The making of academic awards such as inclusion in the Higher Education Achievement Report
- Processing support and welfare concerns to ensure the wellbeing, safety and safeguarding of students.
- The administration of student academic appeals, complaints, disciplinary and sexual misconduct, including responding to requests for information from the Office of the Independent Adjudicator (OIA) should the student complain to this ombus service.
- Recording and reporting accidents, incidents and near misses where there is a legal obligation.
- The use of CCTV within University grounds to provide a safe University environment and to facilitate the prevention and detection of crime.

5.2.3 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(c):

(c) processing is necessary for compliance with a legal obligation to which the controller is subject."

## 5.3 Public task

5.3.1 We may need to process your data where we are required to perform a task in the public interest or for our official functions.

5.3.2 We will need to process your personal data under this lawful basis for the following reasons:

- Processing applications for study and enrolment that includes the processing of criminal convictions data and DBS checks. This is done for the safeguarding of vulnerable groups.
- The provision of immigration welfare services for international students including applications for visa extensions
- To award qualifications and ensure we maintain academic standards
- Administration of financial awards and prizes such as scholarships, bursaries and grants, including those provided by third parties.
- Administration of induction events, registration of students on courses and transfers to new courses. This may include special category data where necessary.
- Digital Learning Capture (DLC) of lectures to support the inclusive curriculum approach that seeks to make learning resources available to all students.
- Providing facilities and services central to studies such as library and computing access.
- Production, administration and issue of student identification cards used for purchasing goods and services which includes the monitoring of usage for the purpose of registering students and providing benefits relating to the use of cards.
- Monitoring student attendance and engagement with course material available on the VLE.
- Recording and monitoring actions provided to students to support engagement with their studies, welfare and wellbeing.
- Research and statistical analysis into Learner Analytics.
- Evaluation of academic assessments and coursework.
- The making of academic awards for example by inclusion in the Higher Education Achievement Report.
- Administration of student academic appeals, complaints, disciplinary and sexual misconducts including requests for information from the Office of the Adjudicator (OIA) should the student complain to this ombus service.

5.3.4 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(e):

(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller."

## **5.4 Legitimate interests**

5.4.1 In specific situations, we require your data to pursue our legitimate interests in a way that it is reasonable to expect as part of running the University. We do this in a way that does not materially affect your rights, freedom or interests.

5.4.2 We will need to process your personal data under this lawful basis for the following reasons:

- Maintaining contact with former students through our alumni relations.
- The University works with system vendors, external software houses and external consultancy firms (our partners) to diagnose system issues and enhance system provision. Wherever possible, we will do this work using anonymised data however, some types of work require using actual data. Therefore, there are occasions when we will provide our external partners with access to your data. Where this is the case, we require the external partner to take appropriate measures to protect your personal data.

5.4.3 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(f):

(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."

## 5.5 Consent

5.5.1 We might collect and process your data with your consent in specific situations. We will tell you if we need your consent and will ask you to give consent before processing your data.

5.5.2 When we collect your personal data, we will explain to you what data is necessary for a specific service. We do this when we seek your consent. You can withdraw your consent at any time and do not need to give us a reason. However,

5.5.3 We will need to process your personal data under this lawful basis for the following reasons:

- Offering and providing additional support services such as career advice, counselling services, financial advice and access to sporting activities. The University will seek specific consent where sensitive personal data needs to be obtained to provide a service.
- Administration of external and internal student surveys, including the collection of feedback on distinct services such as Library, Learning Skills and Careers. If we need to undertake a University wide survey, we will tell you about the survey and how we will use the data. We must, by law provide data for surveys, including the National Student Survey (NSS) and the Destinations of Leavers from Higher Education (DHLE).
- Administration of exceptional circumstances applications.

5.5.4 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(a):

(a)the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

### **5.6 Vital Interests**

5.6.1 We may need to process your data to protect your vital interests or those of another person. It will take place only where we cannot process your data on another legal basis. When you join the University we ask you to provide details of your trusted contact. Your trusted contact will be contacted if it is in your vital interest to do so. Therefore, it is good practice to ask your trusted contact before providing their details.

5.6.2 For example, if a student needs to be admitted to a hospital's A & E department with life-threatening injuries following a severe road accident, we may need to disclose information to protect the student's vital interests.

5.6.4 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(a):

(d)processing is necessary in order to protect the vital interests of the data subject or of another natural person.

# 6. Who do we share your personal data with?

6.1 We share data with external organisations for specific purposes. In this section, we give examples of the way we might share your data.

6.2 We may share your data with any of the following external agencies. We set out further details in Appendix 1.

- Students Union (CCSU)
- Higher Education Statistics Agency (HESA)
- Office for Students (OfS)
- Student Loans Company (SLC)
- Student Finance England (SFE)
- A relevant professional or statutory body (eg. Health & Care Professions Council, General Medical Council, British Psychological Society)
- A collaborative partner institution
- Police or other authority to comply with any legal obligation.
- Third parties involved in graduation ceremonies
- Third parties for debt collection purposes

6.3 Whoever we share you information with, we will only share whatever is relevant and necessary to perform the task.

# 7. How long do we keep your personal data?

7.1 How long we keep your personal information depends on our purpose for using the information and our legal obligations.

7.2 We have a retention schedule for information and keep identifiable records only for as long as they have a legal or business purpose. For more information about how long we keep records for, a full breakdown can be accessed <u>here</u>.

7.3 These are examples of the times we keep your data:

 We keep academic transcript data permanently. It is to provide references and verify your study with us. It is to inform our ongoing relationship with you as a graduate of the University.  We keep information relating to your modules and/or qualifications, and related queries and communications, until six years after you have completed the module or qualification. It is because there may be a need to establish, bring or defend any potential claims. We keep assessed work for five years after completing your studies to meet Office for Student (OfS) requirements.

7.4 We destroy information within three years where it does not have a longer-term impact or is required for business purposes.

# 8. How we protect and store your personal information

8.1 We know data security matters to our students and so we treat your data with the utmost care and take all appropriate steps to protect it.

8.2 We are committed to the data protection principles of good practice for handling information and hold all personal information securely. We will only transfer data within the University on a 'need-to-know' basis so we can support our academic and other services to you.

8.3 We regularly monitor our system for vulnerabilities and attacks and conduct penetration testing to identify ways to improve security.

8.4 We store the information you provide on our secure servers or our cloud-based systems within the European Economic Area (EEA).

8.5 However, there are times when we need to store information outside the EEA. Should we transfer your information outside the EEA, we take appropriate security measures to protect your privacy rights. It would be by imposing contractual obligations on the recipient of your personal information or ensuring the recipients subscribe to 'international frameworks' that aim to provide adequate protection.

8.6 We require third-party service providers and agents, where appropriate, to sign non-disclosure agreements that legally bind them to protect your data's confidentiality.

# 9. Your rights as a data subject

9.1 You have the right to ask for a copy of the information we hold about you and there is no charge for this. You can make a request orally or in writing and we will

respond within one calendar month. You can find our subject access request form <u>here</u>.

9.2 If you would like to request information, you can e-mail us at the following address: dp.officer@canterbury.ac.uk.

9.3 Under UK GDPR, you also have the following rights:

- To ask for inaccurate personal data to be rectified or completed if incomplete.
- To have personal data erased in certain circumstances.
- To request the restriction or suppression of your personal data in certain circumstances.
- To request the portability of your personal data in certain circumstances.
- To object to the processing of your personal data in certain circumstances.

# **10. Roles and responsibilities**

If there is anything you are unclear about, you can contact our <u>Information</u> <u>Governance team</u>, which is happy to answer any queries you may have about this Notice or how we process your data.

## **10.1 Data Protection Officer contact:**

You can also contact the University's Data Protection officer:

Name: Robert Melville Email: <u>dp.officer@canterbury.ac.uk</u> Address: Governance & Legal Services Invicta House North Holmes Road Canterbury CT1 1QU

## **10.2 Contacting the regulator:**

If you feel that your data has not been managed correctly, or you are unhappy with our response to any requests you have made to us regarding using your data, you have the right to make a complaint to the Information Commissioner's Office. The contact details for the ICO are:

#### Address:

The Information Commissioners' Office

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.gov.uk.

# Appendix 1 How the University might share your personal information

The University may disclose appropriate personal data, including when relevant conditions apply sensitive personal data, during or after your studies to those outside the University (sometimes called third parties).

The below is a list of third parties we may disclose information to over the course of your time at the University.

#### Universities and Colleges Admissions Service (UCAS)

UCAS <u>collects your personal information</u> to manage and support your application to higher education, which they then share with the University. This is necessary for the performance of a task in the public interest: the provision of higher education.

The University shares personal information with UCAS on your status as an applicant. This is to administer the applications and clearing process which is part of the process of forming a contract with a student.

#### The Students' Union (SU)

Unless you opt out, we shall pass certain data to the SU. Details of the data transferred and the purposes are in the <u>Data Protection Agreement</u> between the University and the SU

It is necessary to comply with a legal obligation, which is the requirement to secure fair SU elections.

It is also part of the University's legitimate purpose in providing students with access to the Students' Union and their services, and for sporting, cultural and recreational activities.

#### Turnitin®

The University uses the <u>Turnitin® UK system</u> to help assessors check students' work for improper citation and potential plagiarism. The system creates a textual similarity review by comparing students' work against various sources. Students may therefore be required to provide a limited amount of personal information, such as name, e-mail address, course details, and submissions, to Turnitin® when using the service.

The University may authorise third parties to make direct copies of any work submitted by you for assessment, but only for the following purposes:

assessment of your work;

- comparison with databases of earlier answers or works or other previously available works to confirm your work is original; and
- addition to databases of works used to ensure that future pieces submitted at this institution and others do not contain content from your work.

The University will not make any more copies than are necessary for these purposes. Where the University makes and keeps copies for the purposes identified above, we do not make personal data available to any third party as this is anonymised.

This information will be stored on a server based in the United States under the TRUSTe Privacy Seal. This means that the information is managed to similar standards required under the UK General Data Protection Regulation. Turnitin® explains this in its <u>Privacy Pledge</u>.

It is necessary to perform a task in the public interest: the provision of higher education services and the need to maintain academic quality standards and integrity.

#### Blackboard

The University uses Blackboard as its Virtual Learning Environment (VLE). It provides a wide range of online tools and a place to upload course materials and other resources. Students automatically have access to the Blackboard system but need enrolling on the Blackboard courses they are studying. Once registered, we will share data with Blackboard.

Blackboard is a signatory of the <u>Student Privacy Pledge</u>.

It is necessary for the performance of the contract to educate.

#### South East University Library Shared Services Partnership (Library Services)

The partners of our library services are Canterbury Christ Church University, the University of Kent, and the University of Greenwich. We work together to provide advanced modern, joined-up, reliable and cost-effective Library and IT related services. We are streamlining our library operations to deliver high-quality library services.

The partnership facilitates share our library operations and information management. It supports improvement in all aspects of library services across the universities, including searching for and ordering titles for the daily benefit of those using library services.

To provide the service, we must process a limited amount of personal data, including information on any disability.

It is part of the University's contract to educate by providing access to learning resources.

#### Sponsors, loan organisations and scholarship schemes

If you have a sponsorship, scholarship, bursary or loan, the University may disclose student personal information to the relevant provider to determine whether support should continue.

If your funding organisation requires regular progress reports as a condition of your receiving funding, we will generally provide this information. You should contact your funding organisation in the first instance if you have any queries about such reports.

It is in the legitimate interests of the University to enable students to continue with their studies.

#### **Debt recovery**

We may disclose personal information about students to third parties attempting to recover debt on behalf of the University where internal procedures proved unsuccessful. It includes sharing information with Debt Collection and Tracing agencies.

Payments are due to the University as part of our contractual relations. The disclosure is part of the enforcement of the contract.

#### Higher Education Statistics Agency (HESA)

The University has, by law, to pass personal information to the Higher Education Statistics Agency (HESA). On 4 October 2022 HESA merged with Jisc. HESA is now part of Jisc. Jisc provides information about who they are, how they process personal data and for what purposes and individual rights in relation to personal data. This information is provided in HESA's collection notice. You can find more specific information <u>here</u>.

#### **Local Authorities**

The University may disclose your personal information to Council Tax offices. The UK GDPR and Data Protection Act 2018 allows organisations to disclose information to relevant bodies to assess and collect taxes.

Students who live in properties occupied solely by other students are not liable to pay Council Tax. Such disclosures will usually be in your interest.

We have agreements with some councils that pay students' accommodation, including care leavers. We are required to provide the council with an invoice which shows the student's name/ID and full accommodation details.

#### **Other Statutory Disclosures**

The University has other statutory obligations under which it must pass personal information relating to you to certain external agencies to meet legal obligations.

Wherever possible, the University will inform you about these disclosures, but in some cases, it is impossible to do this. These are examples of the types of agencies to which the University has a statutory obligation to disclose personal information relating to students

- Quality Assurance Agency (QAA) during quality assessment exercises
- Office for Students (OfS)
- European Audit Commission (for specified courses)
- Student Loans Company (SLC) and Student Finance England for students eligible for a fee, loan, or grant payments
- Electoral Registration Officers
- Professional and regulatory bodies

#### **Placements**

For students registered on courses involving placements, the University will pass necessary personal details and information relating to assessment to the placement providers. In addition, we will receive information from the placement provider about your work on the placement.

The purpose of disclosing this information is to administer the placement and for educational and assessment purposes. It is part of our contract to educate.

#### **Partner Institutions**

Some students undertake studies at another UK-based or international partner institution. We collaborate with these partner institutions to deliver joint franchised, dual or validated awards. The university shares information with our partners for students studying at these institutions. It is part of our contract to educate.

Further information is available in the privacy notice of the partner institution.

#### National Student Survey

The University has, by law, to pass information about its final year undergraduates to the Office for Students (OfS), or its agents, for them to carry out the National Student Survey (NSS). This survey gives final-year students the chance to provide feedback on their experiences at the University and inform prospective students' choices. There is a detailed description on the <u>National Student Survey website</u>.

The University will pass your name and contact details to the agent carrying out the survey. The agent may contact you to take part. You do not have to take part in the survey. You can opt out at any time before taking the survey by contacting the agent and providing verification of your identity by confirming your date of birth.

#### Study Activities outside the UK and students from outside the UK

Some students are on courses that include studying outside the UK or who come to the University as visiting and exchange students. There is a need for the University to exchange personal information with institutions in other countries involved in these exchanges. For instance, students on visiting and exchange courses may require the University to supply information. The University will also receive information about students' progress at other institutions. There may be requirements for providing information to some bodies that fund visiting and exchange students. It forms part of our contract to educate.

You should be aware that some countries outside the UK do not have the same types of safeguards in place for data protection.

#### Prevention or detection of a crime

- The University might provide information under the Data Protection Act 2018 if the disclosure is for the prevention or detection of a crime, the apprehension or prosecution of offenders, or for taxation purposes.
- The University might provide information to the police or another organisation with crime prevention or a law enforcement function. It might include, among others, the anti-fraud sections within the Student Loans Company, local authorities, the NHS Bursary Unit, NHS counter-fraud offices, and United Kingdom Visa and Immigration (UKVI).

#### **Immigration Status**

The University shares information on overseas students with Home Office, UKVI and other international and national governmental and regulatory bodies. It is in connection with the assessment of a student's immigration status.

It is necessary for compliance with legal obligations: immigration status. It is also necessary for performing a task in the public interest: compliance with immigration requirements.

#### Auditors

Like all other organisations, the University has a legal requirement to be audited. The University appoints external and internal auditors who have access to students' data during their investigations.

Auditors treat personal information in confidence and will not share any information viewed within an audit.

#### **University Insurers**

If you have a claim against the University, we may have to provide information to our insurers. It is a legitimate interest in managing insurance claims.

#### Health and Safety Executive

If you are involved in an accident, incident or near miss on or involving University property, it may be necessary to pass your details to the Health and Safety Executive (HSE) as it is a legal requirement.

#### **External examiners**

We share student assessments, including profiles of marks, with external examiners for examination.

It is necessary for performing a task in the public interest: the provision of higher education and the maintenance of academic standards.

#### Parents, guardians, other relatives, friends, and trusted contact

The University treats information concerning you as a student as confidential. We ask all students to provide trusted contact information each year at registration. Usually, a trusted contact will be a parent, partner, family member, carer or guardian.

We only make contact with your trusted contacts in serious or critical circumstances. We do not use trusted contact information to tell someone about your studies at the University. We only use it if we have a concern relating to your health, safety or welfare of yourself or others.

For more information, read our <u>Trusted Contact Policy</u> and our <u>Trusted Contact</u> <u>Privacy Notice</u>.

# How may the University share your data after you have finished your studies?

#### References

The University may disclose relevant additional information about you if a third-party asks to provide a personal or academic reference for employment or further study.

As a matter of good practice, you should inform people you give as a referee beforehand.

If you named the University or any member of its staff in an application, the University considers it in its legitimate interests to disclose personal information in the form of a reference. It is subject to your rights, freedom, or interests.

In some cases, we may receive requests for references on pro-forma you signed to permit us to disclose information as a personal reference.

# Employment agencies, prospective employers and third parties requesting confirmation of awards

However, the University may confirm any award, including the date and classification of the award, without notifying the student in the public interest. We need your

personal data to enable us to perform a task in the public interest as an awardmaking institution.

Such a disclosure would be subject to a check on the origin of the request. The University may request the consent of former students before disclosing details of any award.

#### Award Ceremonies

Names appear in the official award ceremony programme and promotional material connected with the ceremony.

You may request to have your information excluded by contacting <u>Graduation &</u> <u>Registry Events</u> in advance of the ceremony.

You should contact <u>Graduation & Registry Events</u> regarding this matter when you receive an official invitation to a ceremony.

#### Careers

The University has by law to pass information about previous graduates to the Higher Education Statistics Agency (HESA), or its agents, for them to carry out a destinations survey as part of the Graduate Outcomes record. This survey takes place approximately 15 months after you complete your studies.

The University will pass your name and contact details to the agent carrying out the survey. The agent may contact you to take part. You do not have to take part in the survey. You can opt out at any time during the fieldwork period by contacting the agent and providing verification of your identity by confirming your date of birth.

The data collected from the survey will be analysed by HESA and published in an anonymised form so that your responses cannot be identified. A copy of the survey data will also be provided to the University and analysed to inform improvements to courses and student support around life skills, careers and employability.

There is further information for students about the <u>Graduate Outcomes survey</u> on the <u>HESA website</u>.

| Document Information    | Description of Document Ir                             | Iformation                |  |
|-------------------------|--|---------------------------|--|
| Document Title          | Student Privacy Notice                                 |                           |  |
|                         |  |                           |  |
| Department Owner        | Governance & Legal Services                            |                           |  |
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| Document Category       | Category: Information                                  | Description of category:  |  |
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|                         | Use of Special Category Data of Student Privacy Notice |                           |  |
|                         | Trusted Contact Privacy Notice                         |                           |  |
|                         | Accommodation Privacy Notice                           |                           |  |
|                         | Student Wellbeing Services Privacy Notice              |                           |  |
|                         | Library and Learning Resources Privacy Notice          |                           |  |
|                         | Student Survey Privacy Notice                          |                           |  |
|                         | The Careers and Enterprise Hub Privacy Notice          |                           |  |
|                         | School Placements Privacy Notice                       |                           |  |
|                         | Graduation Privacy Policy                              |                           |  |
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