

# Canterbury Christ Church University

## Student Privacy Notice

### 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 and 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 and Education and apprentices.
- 1.4 We want to inform you fully about your rights and how the University uses your data. A [one-page summary document](#) is available.
- 1.5 We hope the following sections will answer any questions you have. If not, please do contact us.
- 1.6 We will need to update this [Privacy Notice](#) from time to time. We will notify you of any significant changes. You are welcome to come back and check it whenever you wish. We welcome comments on the Privacy Notice. We take your comments into account in updating the Notice.

### 2. Canterbury Christ Church University as Data Controller

- 2.1 Canterbury Christ Church University is the data controller for the processing activities described below. It means the University decides the reasons for processing your personal information.
- 2.2 Our contact details are as follows:

Canterbury Christ Church University  
North Holmes Road  
Canterbury  
Kent  
CT1 1QU

Website: <https://www.canterbury.ac.uk/>

Contact details: <https://www.canterbury.ac.uk/about-us/contact-us.aspx>

- 2.3 Where this Privacy Notice refers to “we,” “our”, or “us”, or “the University,” we mean Canterbury Christ Church University. When we refer to “you” or “your,” we mean an applicant to or student at Canterbury Christ Church University.

2.4 We must collect and process personal data to provide services to students and meet our legal requirements. We need to do so to manage our operations effectively, especially in supporting students in their studies. We hold electronic and paper data, including your personal details, academic and administrative history, and relevant transactions.

2.5 There is a statement on our approach to managing personal information in our [Data Protection Policy](#)

2.6 The University Data Protection Officer is

Robert Melville  
Assistant University Secretary  
Canterbury Christ Church University  
North Holmes Road  
Canterbury  
CT1 1QU

E-mail: [dp.officer@canterbury.ac.uk](mailto:dp.officer@canterbury.ac.uk)  
Telephone: 01227 767700

### **3. The legal bases we rely on**

3.1 Data protection law sets out reasons for collecting and processing your personal data. In this section, we outline the legal bases. You can read more about the legal bases in Appendix 1 (Purposes in Using Personal Data).

#### **Contractual obligations**

3.2 We need your personal data to comply with our contractual obligations.

3.3 For example, on becoming a student, you enter into a contract with us so that we can provide you with an education. If you live in our residential accommodation, you enter into a contract with us so that we can provide you with the accommodation.

#### **Legal compliance**

3.4 If the law requires us to, we may need to collect and process your data.

3.5 For example, we must ensure we meet our statutory obligations, including those related to diversity, equal opportunities, and health and safety. We might have to pass on details of people involved in fraud or other criminal activity to law enforcement and regulatory bodies for students undertaking a professional course.

#### **Public task**

3.6 We need your personal data to enable us to perform a task in the public interest or for our official functions.

3.7 For example, we need to process personal data to award qualifications and ensure that we maintain academic standards.

### **Legitimate interest**

3.8 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.

3.9 For example, we have a legitimate interest in maintaining contact with former students through our alumni relations.

### **Consent**

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

3.11 When we collect your personal data, we 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. You need not give a reason. However, this may restrict the service on offer, and we may explain this to you.

3.12 For example, if we need to undertake a university-wide survey, we will tell you about the survey and how we will use your data. We must, by law, provide data for surveys, including the National Student Survey (NSS) and the Destinations of Leavers from Higher Education (DHLE)

### **Vital Interests**

3.13 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. We will invite you to provide next of kin detail if you wish. You should ask your next of kin before providing their details.

3.14 For example, if a student needs admitting 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.

## **4. When do we collect your personal data?**

4.1 We obtain personal data about you from various sources.

### **Information you give to us**

4.2 We create a record in your name as soon as you contact us. You may have provided your contact details for open day activities when you enquired about being a student with us. You may have sent us details about yourself and your study plans. To that record, we add information you give us when applying and/or registering for one of our courses. We add further information throughout your studies.

4.3 We hold information about you, such as

- 4.3.1 your name, addresses, e-mail addresses, telephone numbers, courses and modules studied and fee payments
  - 4.3.2 examinations, assessments, results for modules and courses, and qualifications
  - 4.3.3 your engagement with various student procedures.
- 4.4 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” of data for activities, including equal opportunities monitoring 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.
- 4.5 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.
- 4.6 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.
- 4.7 We 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.

#### **Information we automatically collect**

- 4.8 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.
- 4.9 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 in our Privacy and Cookies Policy.
- 4.10 Should you use your University e-mail address and other Microsoft Office 365 services, we will collect data about your use of the service.

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

- 4.11 We may receive information about you from third parties.
- 4.12 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.
- 4.13 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.
- 4.14 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.

- 4.15 Should part of your studies require you to undertake a placement, we will process the information we receive from the placement provider.
- 4.16 If you are studying and registered with a collaborative partner institution, we may receive information about you from our partner.
- 4.17 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.
- 4.18 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.

## **5. How we use your personal information**

- 5.1 We collect and process a broad range of personal data about you. It is to deliver our services and support you, manage our operations effectively, and meet our legal requirements.
- 5.2 Agresso QL Students, known as 'QL,' is the student records system used at the University. QL contains all student data, including present and former students. QL is where we create and maintain student records. Both academic and professional service staff use QL to manage and view student data.
- 5.3 Should you not provide all information we need at application, registration, or during your studies, we may not be able to provide fully effective academic or support services to enable you to succeed.
- 5.4 The purposes for which we may use personal data (including special category personal data) we collect include:
  - 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
  - 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
  - providing library, IT and information services
  - 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.

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

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

5.7 You may submit "special category" information to us. For example, you may need medical evidence for funding and extenuating circumstances. 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.

- 5.8 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.
- 5.9 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.
- 5.10 We provide further information on the purposes we use your information in Appendix 1 (Purposes in Using Personal Data). It includes the legal basis for processing data.

## **6. Who we might share your data**

- 6.1 We share data with external organisations for specific purposes. We set out further details in Appendix 2. In this section, we give examples of the way we might share your data.
- 6.2 When you register as a student, we will share information with the Students' Union (CCSU) as you automatically become a member. We have a [Data Protection Agreement](#) with the Students' Union.
- 6.3 We share data with other organisations where we have a legal or regulatory obligation to do this, for example, with the Higher Education Statistics Agency (HESA) and government departments. You can read about how HESA uses your data on its website (<https://www.hesa.ac.uk/about/regulation/data-protection/notices>).
- 6.4 We share your data so you can participate in surveys commissioned by the Office for Students (OfS). Contractors may conduct these surveys on OfS's behalf. If you do not want to take part in the National Student Survey (NSS), you can request this via [www.thestudentsurvey.com](http://www.thestudentsurvey.com)
- 6.5 We share data with organisations that provide funding, for example, the Student Loans Company and the national funding authorities/ government bodies, e.g., Student Finance England, and sponsor organisations.
- 6.6 We may disclose your information to our third-party service providers and agents to provide services to us or directly to you on our behalf. When we use third-party service providers, we only disclose any personal information necessary to provide their service. We have a contract that requires them to keep your information secure and not use it other than following our specific instructions.
- 6.7 If you are studying towards a qualification that leads to professional recognition, we may share information with the relevant professional or statutory body (for example, the Nursing and Midwifery Council, Health and Care Professions Council, General Medical Council, British Psychological Society, Solicitors Regulation Authority, and Bar Standards Council).
- 6.8 If you are studying and registered with a collaborative partner institution, we may share information about your studies with our partner.

- 6.9 We may disclose your personal information if we are under a duty to disclose or share it to comply with any legal obligation. These purposes include detection or prevention of a crime, taxation, enforcing or applying the terms of our contracts, or protecting the rights, property or safety of our enquirers, visitors and students. However, we will always aim to protect your privacy rights.
- 6.10 We will pass personal data to third parties involved in graduation ceremonies (including robing suppliers and photographers).
- 6.11 We may disclose information for debt collection purposes. We would do this by sharing information with a debt collection or tracing agency.

## **7. How long we keep your personal information**

- 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. We provide more details in Appendix 3 (Retention Schedule). These are examples of the time we keep your data:
- 7.2.1 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.
- 7.2.2 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.
- 7.2.3 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 data**

- 8.1 We know data security matters to our students. We will 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. We 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.

## **9. Your rights as a data subject**

9.1 You have the right to ask for a copy of the information about you that we hold. There is no charge. If you would like to request information, you can e-mail us at this address: [dp.officer@canterbury.ac.uk](mailto:dp.officer@canterbury.ac.uk).

9.2 You 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.

9.3 You can make a request orally or in writing. We will respond in a calendar month.

## **10. Who to contact should you have a query**

10.1 If there is anything you are unclear about, you can contact our Information Governance team (e-mail: [information.governance@canterbury.ac.uk](mailto:information.governance@canterbury.ac.uk)), which is happy to answer any queries you may have about this Notice or how we process your data.

## **11. Where to make a Complaint**

11.1 If you have a complaint about the way we manage your data, you can complain to the University's Data Protection Officer.

11.2 The University Data Protection Officer is

Robert Melville  
Assistant University Secretary  
Canterbury Christ Church University  
North Holmes Road  
Canterbury  
CT1 1QU

E-mail: [dp.officer@canterbury.ac.uk](mailto:dp.officer@canterbury.ac.uk)  
Telephone: 01227 767700

## 12. Contacting the Regulator

- 12.1 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 are:

The Information Commissioners' Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 0303 123 1113

Website: [www.ico.gov.uk](http://www.ico.gov.uk).

# Canterbury Christ Church University

## Student Privacy Notice

### Appendix 1

#### Purposes of Using Personal Data

	Specific Purposes	Legal Basis
	<b>Application stage</b>	
1	Management of enquiries from prospective students and communication of information about our services, events, and activities	Legitimate purpose of providing appropriate support to applicants based on their needs is to enable applicant decision-making, making use of a soft opt-in (that is, not a specific opt-in consent)
2	Correspondence with applicants regarding the next steps in the application and enrolment processes	Necessary to enter into a contract to educate with students
3	Processing of applications for study and enrolment as a student that includes the processing of criminal convictions data and DBS checks	Necessary for the performance of a task in the public interest - the safeguarding of vulnerable groups
	<b>Registration Stage</b>	
4	<p>Administration of induction events, registration of students on courses and transfers to new courses</p> <p>We will use your personal information to:</p> <ul style="list-style-type: none"><li>• Enrol you as a student, where your application is successful, and you accept our offer; and</li><li>• Communicate with you about the enrolment process.</li><li>• Facilitate your education;</li><li>• Record the details of your previous academic studies (including any placements with external organisations);</li><li>• Determine your examination achievements; and</li><li>• Communicate with you about your education.</li></ul>	<p>Necessary for entering into a contract to educate with students; necessary for the performance of a task in the public interest: the provision of higher education</p> <p>We explain the legal basis for special category and criminal record data in our <a href="#">Policy Statement on Processing Special Category and Criminal Record Data</a>.</p>

	<b>Specific Purposes</b>	<b>Legal Basis</b>
	<p>We will also process criminal conviction data where you work with children or vulnerable adults and/or because of requirements in certain regulated professions. For example, specific courses require a DBS check as part of the eligibility assessment. We notify you before the processing if this is a requirement for enrolment on your course.</p> <p>In some cases, the information processed will include special category data.</p>	
5	<p>The provision of University accommodation. This processing may include personal data you disclose regarding health conditions or disabilities and specific criminal record data relevant to your accommodation.</p>	<p>Necessary for the performance of the University's contract with its students; explicit consent to the extent that special category personal data is obtained.</p> <p>We explain the legal basis for special category and criminal record data in our <a href="#">Policy Statement on Processing Special Category and Criminal Record Data</a>.</p>
<b>Student Services During Registration</b>		
6	<p>Offering and providing additional support services such as career advice, counselling services, financial advice, and access to sporting activities.</p>	<p>Access to these services is optional. Consent is relied upon for any processing necessary to deliver the services. The University will obtain explicit consent where sensitive personal data needs obtaining to provide the service.</p>
7	<p>Assessment of the provision of support services to students, including the provision of disability support services and learning and research support skills services.</p>	<p>Legitimate purpose of providing appropriate support to students based on their needs</p>
8	<p>Processing of safeguarding concerns to ensure the safety and wellbeing of students</p>	<p>Legitimate purpose of ensuring the safety and well-being of students</p>
9	<p>Providing facilities and services central to studies, particularly Library access and computing access, using your personal information to manage your use of facilities and participation at events (e.g. computing, libraries, functions, careers)</p>	<p>Necessary for entering into a contract to educate with students; necessary for the performance of a task in the public interest: the provision of higher education</p>
10	<p>Monitoring of use of IT services following the Acceptable Use Policy to protect the security and integrity of our IT network and information</p>	<p>Legitimate purpose of ensuring network security</p>
11	<p>Monitoring student attendance and engagement with course material available on the VLE</p>	<p>Legitimate purpose of ensuring students achieve academic success through full engagement with their studies</p>

	<b>Specific Purposes</b>	<b>Legal Basis</b>
<b>12</b>	Monitoring compliance with equalities legislation	Legitimate purpose of seeking to widen access to higher education, encourage diversity amongst the student body and provide appropriate support; necessary to comply with a legal obligation - the requirement to comply with the University's obligations under the Equality Act 2010 and reporting requirements to HESA
<b>13</b>	Provision of immigration welfare services for international students, including applications for visa extensions	Legitimate purpose of supporting international students; necessary to comply with a legal obligation - compliance with immigration legislation
<b>14</b>	Administration of external and internal student surveys, including the collection of feedback on distinct services such as Library, Learning Skills and Careers	Consent from students who complete the surveys
<b>15</b>	Administration of job applications and employment contracts where the student is employed through UNITEMPS	Necessary for the purposes of entering into an employment contract with students or
<b>16</b>	Research and statistical analysis into Learner Analytics	Necessary for the performance of a task in the public interest - the provision of higher education; Legitimate purpose of analysing student data to help make informed decisions which can lead to improved student satisfaction, retention, and attainment
<b>17</b>	Submission and marking of work submitted for assessment	Necessary for the performance of the University's contract with its students; explicit consent to the extent that special category personal data is obtained
<b>18</b>	Evaluation of academic assessments and coursework	Necessary for the performance of a task in the public interest - the provision of higher education  Necessary for compliance with a legal obligation to which the University is subject (Office for Students Requirements relating to entry on the Register of HEI Providers)
<b>19</b>	Making of academic awards, for example, by inclusion in the Higher Education Achievement Report	Necessary for the performance of a task in the public interest: the provision of higher education.  Necessary for compliance with a legal obligation to which the University is subject

	<b>Specific Purposes</b>	<b>Legal Basis</b>
		(Office for Students Requirements relating to entry on the Register of HEI Providers)
<b>20</b>	Audio recording of lectures following our Lecture Capture Policy	Legitimate purpose of providing online access to lecture content is to deliver a learning experience for our students
<b>21</b>	Processing and recovery of University fees, including course and accommodation fees	Necessary for the performance of the University's contracts with students
<b>22</b>	Administration of financial awards and prizes such as scholarships, bursaries, and grants, including grants and scholarships provided by third parties	Legitimate purpose of administering financial support for students
<b>23</b>	Administration of financial aid, such as grants and loans	Legitimate purpose of administering financial support for students
<b>24</b>	Registration as a member of University alumni upon graduation. Your data as an alumni member will be processed following the University's alumni data protection notice.	Legitimate purpose of maintaining our relationship with graduates
<b>Student Procedures</b>		
<b>25</b>	Administration of disciplinary proceedings concerning student misconduct	Legitimate purpose of protecting the University and the wider community
<b>26</b>	Administration of investigations into academic misconduct following the University's procedure for handling academic misconduct	Necessary for the performance of a task in the public interest: higher education provision, (Investigating complaints concerning misconduct is essential to maintain the integrity of the University's assessment process, our academic standards and reputation)
<b>27</b>	Administration of student appeals and complaints, including the Office of the Independent Adjudicator (OIA) Scheme	Necessary for the performance of a task in the public interest: higher education provision providing an avenue to raise appeals regarding academic assessments and any other grievances); necessary to comply with a legal obligation - the requirement to comply under consumer law
<b>28</b>	Administration of exceptional circumstances applications	Consent

**Administration of the University**

<b>29</b>	Production of student identification cards and the issue and administration of cards used for purchasing goods and services, including monitoring of usage	Legitimate purpose of registering students and providing cards offering benefits
<b>30</b>	Credit card information for payments of fees and accommodation charges. Bank account information to pay bursaries and student travel expenses.	Necessary for the performance of the University's contracts with students
<b>31</b>	Recording and reporting accidents, incidents and near misses	<p>Legitimate purpose of providing a safe University environment.</p> <p>There is a legal obligation to record and report accidents, incidents and near misses in specific cases.</p>
<b>32</b>	The University has a CCTV surveillance system across its campuses. In certain circumstances, members of Security may use body-worn CCTV cameras. Trained staff members monitor those cameras on and within buildings and comply with the University's Data Protection Policy.	Legitimate purpose of providing a safe University environment, facilitate prevention and detection of crime and assist with the investigation into potential breaches of University regulations and policies

# Canterbury Christ Church University

## Student Privacy Notice

### Appendix 2

#### 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).

##### **UCAS**

UCAS (Universities and Colleges Admissions Service) [collects your personal information](#) to manage and support your application to higher education, which they then share with the University. It 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. It is to administer the applications and clearing process. It is part of the process of forming a contract with a student.

##### **The Students' Union**

Unless you opt out, we shall pass certain specific data to the Students' Union. Details of the data transferred and the purposes are in the [Data Protection Agreement](#) between the University and the Students' Union.

It is necessary to comply with a legal obligation, which is the requirement to secure fair Students' Union 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 [Turnitin® UK system](#) 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 and/or make direct copies of any work submitted by you for assessment, but only for the following purposes:

- i) assessment of your work;
- ii) comparison with databases of earlier answers or works or other previously available works to confirm your work is original; and



- iii) 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. It will retain such copies as remain required for those 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 we anonymise the material.

The University will not make any more copies than necessary, will only use copies made for these purposes and will retain such copies as required.

This information will be stored on a server based in the United States under the TRUSTe Privacy Seal. It requires managing the information to similar standards to those required under the General Data Protection Regulation. Turnitin® explains this in its [Privacy Pledge](#).

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 [Student Privacy Pledge](#).

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

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

The partners of Libshare 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-related and IT services. We are streamlining our library operations to deliver high-quality library services.

The partnership facilitates shared working in our library operations and information management. It supports improvement in all aspects of the 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 you 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. Further details about the information shared with HESA are in the [HESA-Student collection notice](#) on the [HESA website](#).

It is necessary to comply with a legal obligation: the requirement to provide information. It is also necessary for performing a task in the public interest (statutory functions or responsibilities of Government Departments and public bodies) and for statistical and research purposes in the case of disclosures of sensitive personal data).

### **Local Authorities**

The University may disclose your personal information to Council Tax offices. The 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 have 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 [National Student Survey website](#).

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 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 European Union do not necessarily have as strong a data protection regime.

### **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 appoints external and internal auditors who have access to students' data during their investigations.

Auditors treat personal information in confidence and do not make it public.

The audit is a legal requirement.

### **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). 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 emergencies**

The University treats information concerning you as a student as confidential. The University does not release information to a third party, including friends and relatives, about your addresses and telephone numbers, your studies, your progress, and the provision of services. The exceptions are where you have authorised the release

of the information, the third party is acting as a guarantor, or the University must release the information by law.

Except in the most exceptional circumstances, which affect the vital interests of a student who cannot provide consent, the University will not disclose personal information.

If you provided a nominated contact in the event of a medical or another emergency, then the University may provide some personal information to that contact as a public interest task.

## **How will the University use 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 award-making 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 [Graduation & Registry Events](#) in advance of the ceremony.

You should contact [Graduation & Registry Events](#) 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 [Graduate Outcomes survey](#) on the [HESA website](#).



# Canterbury Christ Church University

## Student Privacy Notice

### Appendix 3

#### Retention Schedule

##### Section One: Materials Relating to Student Procedures and Assessments

Type of documentation	Retention Period	Reason for Retention Period	Where Definitive Copy Retained
<b>Student Recruitment</b>			
Enquiries and Expressions of interest in courses and open day information	Three years after the creation date in Salesforce	Responding to queries from applicants	Salesforce
Unsuccessful applicants and successful applicants who decline or do not respond to an offer <ul style="list-style-type: none"><li>• application forms,</li><li>• interview information,</li><li>• interview notes</li></ul>	One year after the end of the admission cycle	Responding to enquiries or complaints from applicants	Admissions
Successful applicants registering at the University <ul style="list-style-type: none"><li>• application forms</li><li>• interview information</li><li>• Interview notes</li></ul>	Six years after the student leaves	Limitation Act 1980 ss. 2,5	Registry



<ul style="list-style-type: none"> <li>• offer of a place and related correspondence</li> <li>• acceptance of a place and related correspondence</li> <li>• supporting references</li> </ul>			
Application data	Ten years after the application made	Identifying trend data; necessary for the performance of a task in the public interest: the provision of higher education and widening access	Planning Office
Information relating to DBS disclosure and criminal convictions	<p>Six months after checking, in line with DBS requirements.</p> <p>Record of undertaking the check for the duration of the student's registration</p>	<p>Responding to enquiries or complaints from applicants</p> <p>Record required to evidence to the undertaking of the check</p> <p>See also Policy Statement on the Use of Applicant and Student Special Category Personal Data and Criminal Records</p>	Admissions
Complaints about admissions service	Three years after the last action	Responding to enquiries or complaints from applicants; analysing trends	Admissions
Appeals against non-admission	Six years after the last action	Limitation Act 1980 ss. 2,5	Admissions

**Student Academic Record**

<p>School Records relating to</p> <ul style="list-style-type: none"> <li>• induction, and events for new students</li> <li>• administration of the course</li> <li>• communications relating to course changes</li> <li>• clinical assessments</li> </ul>	Six months after the student leaves the course	Student Appeal or Complaint	School
Contents of student file, e.g. attendance date, e-mails etc	Six years after the student leaves	Limitation Act 1980 ss 2,5	School
<p>Records relating to a student's registration at the University, including</p> <ul style="list-style-type: none"> <li>• student ID number</li> <li>• bibliographical information</li> <li>• student photograph</li> <li>• module registration</li> <li>• progression data</li> <li>• work placements, where a part of the course</li> <li>• change of course application</li> <li>• withdrawal / Interruption of studies</li> <li>• final transcript, including module results and final award</li> </ul>	Permanently	Confirmation of registration and study at the University; contractual relationship	Registry
Academic records, including classification of awards and module grades	Permanently	Confirmation of academic course and award	Registry

<b>Student Finance</b>			
Invoices and Fee payment	Six years after the discharge of debt	Limitation Act 1980 ss 2,5	Finance
Credit card and bank details relating to fees, charges and payments	Six years after the final payment	Limitation Act 1980 ss 2,5	Finance
Records relating to student debt	Six years after the discharge of debt	Limitation Act 1980 ss 2,5	Finance
Bursaries, maintenance grants and scholarships	Six years after completion of the programme	Limitation Act 1980 ss 2,5	Finance
Financial hardship records	Six years after completion of the programme	Limitation Act 1980 ss 2,5	Student Wellbeing
Disability allowance records	Six years after completion of the programme	Limitation Act 1980 ss 2,5	Student Wellbeing
<b>Health and Safety Records</b>			
Accidents, incidents and near misses	Three years after the occurrence of the date of knowledge of the person injured  Specific occurrences are retained for longer if required by law.	Limitation Act 1980 s11  Health and Safety at Work etc. Act 1974 and relevant health and safety regulations	Human Resources
<b>Student Wellbeing</b>			
Student Case Files	Six years after the last entry	Limitation Act 1980 ss 2,5	Student Wellbeing

<b>Materials Related to Examined Work</b>			
Coursework submissions (which include all forms of assessment, including examination scripts)	A copy of course work submitted by students is retained for five years after the completion of the student's course.	OfS Requirement- necessary for compliance with a legal obligation to which the University is subject	School
Assessment feedback	Five years after the completion of the student's course	OfS Requirement- necessary for compliance with a legal obligation to which the University is subject	School
	Individual markers may retain comments for three years	Benchmarking performance	Individual Markers
Dissertations	MPhil/PhD - indefinitely		Library
	Masters dissertations - Five years after the completion of the student's course	OfS Requirement- necessary for compliance with a legal obligation to which the University is subject	School
Examination scripts and comments	Five years after the completion of the student's course	OfS Requirement- necessary for compliance with a legal obligation to which the University is subject	School
Examination question papers	Three years after the end of the year of examination	Reference purposes	Library
Coursework assessment descriptors and criteria	Five years after the completion of the student's course	OfS Requirement- necessary for compliance with a legal obligation to which the University is subject	School

Records relating to the administration of assessments, including reassessments, of a student at the University, including:			
<ul style="list-style-type: none"> <li>• organisation of assessments</li> <li>• attendance at assessments</li> <li>• special arrangements</li> <li>• assessments conducted at a distance</li> <li>• extensions</li> </ul>	One year after the completion of the course	Responding to enquiries or complaints from students and former students	School Registry
<b>Placement, Exchange and Attendance Records</b>			
Placement records	Six years after the Board of Examiners made the award	Limitation Act 1980 ss2,5	Faculty, within the relevant placement and partnerships team
Student exchanges and year abroad	Six years after the Board of Examiners made the award	Limitation Act 1980 ss2,5	School
Attendance records	Three years after the Board of Examiners made the award	UKVI and OfS audit requirement	School

**Exceptional Circumstances Materials**

Exceptional Circumstances requests and outcomes where the final award is based on more than one level of study	Six months after the meeting of the Boards of Examiners approving the award (except where the student enters an appeal, in which case the materials are retained for six years)	Examination Process and Student Appeals	School
Exceptional Circumstances requests and outcomes where the outcome is based on one level of study	Six months after the meeting of the Boards of Examiners making the decision (except where the student enters an appeal, in which case the materials are retained for six years)	Examination Process and Student Appeals	School
Supporting Evidence for Exceptional Circumstances requests	Three months after the student is informed of a decision not to agree to a request.  Where the request is agreed upon immediately following the communication of the decision, as it represents special category data.	Examination Process and Student Appeals	School

Temporary Learning Agreements /Learning Support Plans	Six months after the meeting of the Boards of Examiners making the decision (except where the student enters an appeal or complaint, in which case the Temporary Learning Agreements are retained for six years)	In a three-year full-time degree course, the award is based on the second and third years of the course. The Temporary Learning Agreements for the first year are to be retained for six months after the Board meeting at the end of the <b>first</b> year.	School
Learning Support Plans	Six months after the meeting of the Boards of Examiners making the decision (except where the student enters an appeal or complaint, in which case the Learning Support Plans are retained for six years)	In a three-year full-time degree course, the award is based on the second and third years of the course. The Learning Support Plans for the first year are to be retained for six months after the Board meeting at the end of the <b>first</b> year.	Student Wellbeing
<b>Board of Examiners Proceedings</b>			
External examiner nominations	Six years after the end of the term of office	Limitation Act 1980 ss2,5	Quality and Standards Office
Papers relating to submission or resubmission of work	Six months after Notification to Students of the Board's Decision	Examination Process and Student Appeals	School
Mark Sheets	One year after Notification to Students of the Board's Decision	Examination Process and Student Appeals, and to track students in the preparation of the following Board for continuing students	School
Minutes of Board of Examiners	Six years after the Board of Examiners made the award	Limitation Act 1980 ss2,5	School and Student Records Team

Correspondence informing students about outcomes of Board of Examiners decisions	One year after the Board of Examiners made the award	Examination Process and Student Appeals, and to track students in the preparation of the following Board for continuing students	School
Records documenting marks/grades given to submitted/completed summative assessments and, where appropriate, awards and classifications	Six years after the Board of Examiners made the award	Limitation Act 1980 ss2,5	Registry
Decision Sheets	Six Years after the Board of Examiners made the award	Limitation Act 1980 ss2,5	Registry
External examiner reports	Six years after the date of the report	Limitation Act 1980 ss2,5	Quality and Standards Office
<b>Disciplinary Procedures</b>			
Procedures Documentation	Six years after the last changes	Limitation Act 1980 ss2,5	Student Protection and Student Resolution
Academic Misconduct Investigations	Six years after the last action	Limitation Act 1980 ss2,5	Student Protection and Student Resolution
Formal Disciplinary Proceedings	Six years after the last action	Limitation Act 1980 ss2,5	Student Protection and Student Resolution
Student Fitness to Practise/Professional Suitability Panel Papers, including case log	Six years after the last action	Limitation Act 1980 ss2,5	Faculty
Any disciplinary proceedings not leading to formal proceedings	Six months after the last action	Student Appeal	School or department undertaking investigation
Cause for concern letters/ correspondence/records of meetings	Six months after the last action	Student Appeal	School or department undertaking investigation



<b>Appeals and Complaints</b>			
Academic Appeals papers	Six years after the last action	Limitation Act 1980 ss2,5	Student Protection and Student Resolution
Office of the Independent Adjudicator papers (OIA)	Six years after the last formal OIA event associated with the appeal or complaint  Formal OIA Complaint Outcomes retained for ten years to allow us to identify trends and themes in complaints	Limitation Act 1980 ss2,5	Student Protection and Student Resolution
Formal Complaints	Six years after last action	Limitation Act 1980 ss2,5	Student Protection and Student Resolution
<b>Research Students</b>			
Records documenting the conduct of formal assessments of work undertaken by research students.	Six years after the student has left the course	Limitation Act 1980 ss2,5	Graduate College
Records documenting academic advice and guidance to individual students on selecting research subjects and the progress and standard of their work.	Six years after the student has left the course	Limitation Act 1980 ss2,5	Graduate College
Records documenting the appointment of supervisors and examiners for research students.	Six years after the student has left the course	Limitation Act 1980 ss2,5	Graduate College

**Section Two: Materials Relating to Validation, Review and Policy**

Type of documentation	Retention Period	Reason for Retention Period	Where Definitive Copy Retained
<b>Policy Materials</b>			
Policy Documentation	Six years after the last changed or withdrawal	Limitation Act 1980 ss2,5	Quality and Standards Office
Professional, Statutory and Regulatory Body Approval and Monitoring Information	Six years after the date of documentation or end date of approval	Limitation Act 1980 ss2,5	School
Planning Forms	Six years after the last cohort	Limitation Act 1980 ss2,5	Planning Office - Schools hold copies as working documents for the duration of the Course
Final validation document	Permanently	Archive Purposes and Confirmation of academic course and award	Quality and Standards Office - Schools hold copies as working documents during the finalisation of validation document
Validation minutes	Six years after Validation Panel by the Quality and Standards Office	Limitation Act 1980 ss2,5	Quality and Standards Office
Validation evaluation forms	Six months after Validation Panel	Evaluation purposes	Quality and Standards Office
Validation and External expenses claims	In line with Finance Requirements	Limitation Act 1980 ss2,5	Quality and Standards Office

Course modifications	Permanently	Archive Purposes and Confirmation of academic course and award	Quality and Standards Office - Schools hold copies as working documents during the finalisation of validation document
Short courses	Six years after the last cohort	Limitation Act 1980 ss2,5	Quality and Standards Office - Schools hold copies as working documents during the finalisation of validation document
<b>Materials Relating to Partnerships</b>			
Memorandum of Agreement	Six years after the last cohort	Limitation Act 1980 ss2,5	Faculty
Memorandum of Understanding	Six years after the last cohort	Limitation Act 1980 ss2,5	Faculty
Financial Arrangements for Collaborative Partnerships	Six years after the last cohort	Limitation Act 1980 ss2,5	Faculty
Collaborative Provision Sub Committee Minutes and Papers	Six years after the end of the Academic Year in which it took place	Limitation Act 1980 ss2,5	Quality and Standards Office
<b>School and Departmental Reviews</b>			
Periodic Internal Review Reports	Six years after Approval of the Report	Limitation Act 1980 ss2,5	Quality and Standards Office

Annual Departmental Review Reports	Six years after Approval of the Report	Limitation Act 1980 ss2,5	Quality and Standards Office
<b>Handbooks</b>			
Student Handbook Template	Maintained in real-time	Provide the latest version	Quality and Standards Office
Course Handbooks	Six years after the year of course	Limitation Act 1980 ss2,5	School
Placement Handbooks	Six years after the year of course	Limitation Act 1980 ss2,5	School
Module Handbooks	Six years after the year of course	Limitation Act 1980 ss2,5	School
<b>Course and Module Evaluations</b>			
Evaluation Forms	Three months after completion of the report	Evaluation purposes in the legitimate interests of the University	School
Evaluation Report	Six years after the year of course	Limitation Act 1980 ss2,5	School
<b>Student Surveys</b>			
Pseudonymised data	Ten years after the completion of the survey	Data processed for scientific, statistical and historical purposes	Student Survey Unit