

PRIVACY NOTICE

Students

The purpose of this Privacy Notice is to tell you how the university will collect and use your personal data. In addition to this notice, you may be given further information about the uses of your personal data when you use specific services and facilities offered by the University of Gloucestershire.

This Privacy Notice may be updated from time to time to ensure continued compliance with Data Protection legislation and to reflect best practice.

The latest version of the Notice can be found on our [data protection webpage](#).

1. Identity and contact details of the Data Controller

The University of Gloucestershire is registered with the Information Commissioner's Office as a Data Controller and is committed to protecting the rights of individuals in line with Data Protection legislation.

A copy of this registration can be found [on the ICO website](#).

2. Contact details of the Data Protection Officer

The Data Protection Officer is responsible for advising the university on compliance with Data Protection legislation and monitoring its performance against it. If you have any concerns regarding the way in which the university is processing your personal data, please contact the Data Protection Officer at:

Data Protection Officer
University of Gloucestershire
Registrar's Directorate
Fullwood House
The Park
Cheltenham, GL50 2RH
Email: dpo@glos.ac.uk

3. Where does the university obtain your personal data from?

The university obtains personal data about you from a range of sources, many depending on your circumstances or the services at the university you use. Some of the main sources of information include:

- information provided by you on your application form, on enrolment, at open days etc.
- information provided by you whilst at the university and in relation to your studies
- information collected during the use of university support and services e.g. accommodation, wellbeing and the library
- information provided to the university by a third party in relation to your admission / enrolment and / or your subsequent study at the university e.g. UCAS, any reference provided you're your previous place of study or work, etc.
- information provided by the Home Office or other third party in relation to your status as a home or international student
- information provided by a third party in relation to your funding e.g. Student Loans Company, sponsors etc.

4. What personal data do we collect about you?

The university may collect the following types of personal data about you:

- your name. We will allocate you a unique student number
- your date of birth
- your permanent and term time addresses and contact details including telephone number(s), email and other electronic identifiers
- your next of kin / emergency contact information
- your nationality and your ethnic origin
- National Insurance number or other tax identification number, passport number or national identity card details
- your academic record including your previous qualifications and your academic record whilst at the university
- information relating to your employment history
- your attendance at the university including any suspension or exclusion information
- how your studies are funded, including fee information and any sponsorship details
- information about your family or personal circumstances, and both academic and extracurricular interests, for example, where this is relevant to the assessment of your suitability to receive a bursary, or in order to provide you with appropriate pastoral care
- any student photograph and the capture of images by use of CCTV
- your image and voice may be recorded in accordance with university recording or lecture capture policies that may be in place, and published to students on its website
- your use of Moodle and other university systems
- special category / sensitive personal data as defined under Data Protection legislation as information about an individual's race or ethnic origin, political opinions, religious or

similar beliefs, trade union membership, genetic or biometric data (where used for ID purposes), health, sex life or sexual orientation.

5. The purposes for which we process your personal data

When you make an application, accept an offer and register as a student at the university, we need to process your personal data for the purposes of entering into a contractual relationship with you and then administer that relationship for example to provide you with services (both academic and non-academic) and to meet our obligations to you.

The purposes for which we may use your personal data (including special categories / sensitive personal data) during your association with us include:

- to facilitate your education, record the details of your academic studies including any placements with external organisations, and to determine your academic achievements
- to administer the financial aspects of your relationship with us and any funders
- to manage your use of facilities and participation at events e.g. libraries, accommodation, graduation, use of sporting facilities / sporting activities etc.
- to enable effective communications with you related to your contract
- to operate disciplinary, complaints, and quality assurance processes and arrangements
- to support your health, safety and welfare requirements including sharing necessary information with appropriate third parties such as your family, or the police or NHS, in circumstances where it is in your or another person's vital interests, or there is another legitimate basis
- to produce statistics and research for internal and statutory reporting purposes
- to monitor the university's responsibilities under equalities legislation
- to let you know about other educational opportunities at the university or facilities, events, and activities which may be of benefit to you.

The university has implemented Learning Analytics, a system to review the information it holds on students to give them a greater awareness of how they are studying. Learning Analytics makes statistical analyses of how each student is using the various IT systems provided for their studies such as Moodle. The university uses the data to assist students in achieving their study goals and to help the institution to improve aspects of education for future learners. Learning Analytics are intended to give students and the university a better idea of how their learning is progressing, and suggestions and interventions may be made on the basis of those analytics, if it is considered that the student may benefit from additional support.

Further information can be found in the [Learning Analytics Policy](#) and [Student Guide to Learning Analytics](#).

This is not an exhaustive list of all the ways in which your personal data may be processed by the university.

6. What is our legal basis for processing your personal data?

We may process your personal data as it is necessary for the performance of a contract between you and the university or in order to take steps at your request prior to entering into a contract. In this instance, we use your personal data for:

- interacting with you before you are enrolled as a student, as part of the admissions process e.g. to send you a prospectus or answer enquiries about our course
- providing you with the services as set out in the Student Contract
- dealing with any concerns or feedback you may have
- any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for both our or a third party's legitimate interests. In this instance, we may use your personal data for the following:

- to provide you with educational services
- to monitor and evaluate the performance and effectiveness of the university
- to maintain and improve the academic and professional management of the university
- to promote equality and diversity throughout the university
- to seek advice on our rights and obligations, such as where we require our own legal advice
- recovering debt
- for alumni activities
- for fundraising purposes.

We may also process your personal data for complying with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements
- for the prevention and detection of crime
- for equal opportunities reporting and monitoring
- to help us make reasonable adjustments for any disability, as requested by you
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional
- it is necessary to protect your or another person's vital interests
- we have your specific or, where necessary, explicit consent to do so.

Information relating to conditions for processing can be found on the [ICO's website](#).

Legitimate interests of the university or a third party

In some circumstances the university will process your personal data in pursuance of our own legitimate interests or those of a third party. Where this is the case the university will always take into account your privacy rights and expectations and acknowledges your right to object to such processing. Processing in pursuance of legitimate interests occurs in the following contexts:

- the university will maintain your personal data after you graduate for the purpose of maintaining links with its alumni and friends
- cybersecurity/network security – e.g. detecting viruses and malware on university systems: In some instances the university will process your personal data in order to maintain and enhance the security of its IT systems.
- attendance recording and learner engagement. We may record your educational attendance to inform our decision making and enhance the overall learning experience for example in reviewing programme content, structure and delivery methods.
- other legitimate interests will include upholding the university's regulations for example in detecting assessment offences or our legitimate business interests such as course information, facilities and accommodation information.

Special category data

The university may hold information about you which constitutes special category data as defined in the Legislation, such as details about your ethnicity and racial or ethnic origin, your political opinions, your religious or philosophical beliefs, your trade union membership, your health and any disabilities you may have, your sex life or sexual orientation, your genetic or biometric data and data relating to any criminal(or alleged criminal) offences or convictions, which you have supplied to us.

The university will only process this special category data where you have given your explicit consent for us to do so or when that processing is legally required save that:

- (a) Information about your ethnicity and racial or ethnic origin, your religious or philosophical beliefs and your sexual orientation or sex life may be processed in order to monitor compliance with equal opportunities legislation in order to comply with the requirements of Higher Education Statistics Agency (HESA) and other equal opportunities legislation;
- (b) Information about your physical or mental health and any disabilities which you may have

may be shared with relevant staff of the university in order to provide you with the best possible support for your studies and assessments.

7. Who is your personal data shared with?

For the purposes set out in this Privacy Notice we may share some of your personal data with certain third parties, which may include:

- the Students' Union (SU) to enable the provision of membership services
- student accommodation providers
- organisations with an interest in tracking student progress and attendance including student sponsors, and employers, the Student Loans Company
- to third parties to help pursue and recover debt should you fall into arrears of payment to the university e.g. debt recovery agents, Courts
- teaching and events in university rooms may be recorded and made accessible to relevant students and staff
- third parties who are contracted to work on behalf of the university e.g. IT services, insurers
- plagiarism detection service providers e.g. Turnitin
- if you are studying abroad or involved in exchange programmes, we will release personal data to these institutions or related organisations as required to facilitate your studies
- placement / employment providers or educational partners involved in course provision where this is necessary for the delivery of the programme of study including the NHS
- potential employers or education providers whom you have approached, to confirm your dates of attendance and qualifications
- Higher Education Degree Datacheck (HEDD)
- agents assisting the university with international admissions (this may include the disclosure of personal data outside the European Economic Area)
- Police and other investigative agencies – only where the disclosure of personal data would assist with the investigation of a crime or other alleged misconduct. Such disclosures will be necessary and proportionate to the aims of the investigation
- the Disclosure and Barring Service
- Professional, Statutory and Regulatory Bodies in order to confirm qualifications, accredit a course and, where required, in order to maintain the standards of the profession e.g. Nursing and Midwifery Council (NMC), Health and Care Professions Council (HCPC), and the National Youth Agency (NYA)
- the Gradintel service through which the Higher Education Achievement Report (HEAR) is delivered, to enable access to your HEAR
- organisations seeking student views e.g. to enable the university to endeavour to improve the experience offered to students e.g. the National Student Survey (NSS)
- Government departments and agencies where we have a statutory obligation to

provide information such as Higher Education Statistics Agency (HESA); the Higher Education Funding Council for England (HEFCE); the Office for Students; the Office for Fair Access; the Home Office in connection with UK visas and immigration, Local Education Authorities, and local authorities for Council Tax, electoral registration, and housing benefit purposes

- the Office of the Independent Adjudicator
- on graduation, you will automatically become a member of the university's alumni
- your next of kin / emergency contact (provided at enrolment) in circumstances when it's in your vital interests to do so
- NHS services in circumstances relating to your vital interests or with explicit consent.

This is not an exhaustive list and such third parties may have access to student data only for the purpose of performing their function. Any disclosure of personal data to third parties not listed here will be made only where there is a legitimate reason to do so and in accordance with Data Protection legislation.

8. Any transfers to third countries and the safeguards in place

Some of the personal data we process about you may be transferred outside of the European Economic Area (EEA). The university will only transfer data to countries outside the EEA when satisfied that both the party which handles the data and the country it is processing it in provide adequate safeguards for personal privacy.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to 'appropriate safeguards' for international transfers
- where we have your explicit consent
- contractual obligation.

9. How long will your information be held?

The university keeps personal data for as long as it is needed for the purpose for which it was originally collected in accordance with the [University's Records Retention Schedule](#).

On conclusion of your studies, your core student record data (including name, date of birth, attendance dates, award etc.) will be kept indefinitely, i.e. it will become a permanent historical record. This data is retained in order to provide a record of your registration as a student and your achievements at the university, to allow us to respond to requests for information from graduates and other leavers, and to report on attendance and performance or any other relevant aspect of the student body either at course, School, or university level.

Some anonymised information may also be retained for statistical purposes.

10. What are your rights?

Under Data Protection legislation you have the following rights:

- to request access to, and copies of, the personal data that we hold about you
- to request that we cease processing your personal data
- to request that we do not send you any marketing communications
- to request us to correct the personal data we hold about you if it is incorrect
- to request that we erase your personal data
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- to receive from us the personal data you have provided to us, in a reasonable format specified by you, to another data controller
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights and freedoms.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Any requests or objections should be made in writing to the university's Data Protection Officer, using the contact details under Section 2 of this Privacy Notice.

11. How to raise a query, concern or complaint

If you have queries, concerns or wish to raise a complaint regarding the way in which your personal data has been processed you should contact the Data Protection Officer in the first instance, using the contact details under Section 2 of this Privacy Notice.

If you remain dissatisfied, then you have the right to refer the matter to the Information Commissioner's Office (ICO). The ICO can be contacted at:

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

Telephone: 0303 123 1113

Website: www.ico.org.uk