Student Privacy Notice

1 Introduction

1.1 This notice is for all students of the University of West London (UWL) to explain the purposes for which we hold information about you (your personal data).

1.2 From 25 May 2018, your data will be held in accordance with the General Data Protection Regulation (GDPR).

1.3 UWL is registered as a Data Controller with the Information Commissioner. The University Secretary and Chief Compliance Officer is the Data Protection Officer. If you wish to obtain further information about the University’s registration, it can be viewed at https://ico.org.uk/what_we_cover/register_of_data_controllers (University registration number: Z4666761).

1.4 All data is held and processed in line with the University’s Data Protection Policy. All data which we receive from you or which is created while you are a student is kept securely and only used for legitimate purposes in connection with your education.

2 How does the University collect your data?

2.1 Through the admissions process and at enrolment, you will be asked to confirm various personal and academic details. Further information is collected as you undertake your studies in terms of attendance data, accessing learning materials and your assessment performance.

2.2 We also get data from third party sources such as UCAS and the Student Loans Company. When we obtain data in this way, we will ensure that the third party has the legal authority to provide this.

3 Types and categories of data

3.1 Your data will relate to your personal details, your study record and payment records.

3.2 Your personal data may include ‘special categories of data’ as described under the GDPR. Such special categories include racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

3.3 The University may process data relating to criminal convictions if your course requires a Disclosure and Barring Service Check or your conviction is not spent.

3.4 Particular safeguards will be put in place for the collection and processing of special categories of data and criminal convictions.
4 **Purpose of collection and processing of your data**

4.1 The University needs to process your personal data to manage your course, support your performance and provide you with services.

4.2 The University processes your personal data for the following purposes:

- Administration and delivery of your studies, including your assessments;
- Access to, and security of, University facilities;
- Provision of student facilities and support services (such as library, careers, counselling, IT, advice services, scholarship and bursaries etc);
- Using and analysing your data in order to support you to achieve your study goals
- Carrying out statutory duties to provide information to external agencies (see 'Disclosures' for further details);
- Other activities that are for the purpose of University's legitimate business including the development and maintenance of an Alumni Programme.

4.3 The special categories of data such as ethnicity, religion or belief are used for monitoring, statistical and research purposes in order to improve student satisfaction and attainment.

4.4 The University will collect and analyse student data to help students succeed and achieve their study goals. Student data includes *student characteristic data*, such as previous qualifications and demographic information, as well as *study behaviour data*, such as attendance and the use of Blackboard. The analysis of this data might be used in a number of ways, for example to inform how modules are taught, to help ensure appropriate support is given to all students or to provide you with additional support and keep you engaged in your studies.

4.5 You may also provide the University with details of your physical and/or mental health in order to access Student Services or for the purposes of applying for mitigation.

4.6 The University also provides data to the Students’ Union to enable it to process your membership and provide services and support.

5 **Additional notices and guidance/policies**

5.1 We also have some additional notices, guidelines and policies with further useful information about the way in which we process your personal data:

- **The University's Data Protection Policy** – This contains a lot of useful *general information on data protection and University practices*.

- **Attendance and Engagement Monitoring Policy** – we conduct attendance monitoring for a number of reasons including to assist with student visas for international students and ensure the proper engagement of our students. We require you to participate in electronic recording of attendance using SAM please see our Attendance Monitoring and Engagement Policy for further details.

- **UWL Replay** – we regularly make audio recordings of lectures in which you may be involved. These recordings will be made in accordance with our policy on Lecture Capture. Please note that under this policy we assume that you generally consent to being recorded, however, there is a right to opt out and request an edit of recordings.
Save in agreed exceptional circumstances, we do not permit students to record education activities. Please see [URL] to understand your rights and obligations.

Our Alumni – as an integral part of the University’s services to its students it provides alumni activities. For more information see the Alumni Privacy notice.

Our website – we use Cookies (that will collect your personal data) on our web pages. Please see our policy on the use of Cookies.

HESA returns – we are required to return important information (that will include your personal data) to HESA. Please see HESA’s collection notice together with other supporting information at [https://www.hesa.ac.uk/about/regulation/data-protection/notices](https://www.hesa.ac.uk/about/regulation/data-protection/notices).

6 Lawful basis for processing

6.1 Most of the data we collect from you is required to enable us to administer and deliver your studies. The provision of this data is part of the contract you form with the University when you accept an offer and enrol.

6.2 Some of the activities, such as the work to ensure you are engaged in your studies and succeed in your studies are undertaken as part of the University’s public task to deliver teaching and also value for money.

6.3 In some cases, such as provision of special categories of data, we need your consent to process this and you will be informed of the reasons for collecting the data and also request your consent where required at the time we collect it.

6.3 An explanation of the basis for processing is attached at Appendix 1. The basis for the collection and processing of your data is outlined in Table 1 below.

<table>
<thead>
<tr>
<th>Data</th>
<th>How it is collected</th>
<th>Used for</th>
<th>Basis for processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal details:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name, address, date of birth</td>
<td>Application form/enrolment</td>
<td>Contacting student/identifying student</td>
<td>Required as part of the contract with the University</td>
</tr>
<tr>
<td>Special categories data</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>Enrolment</td>
<td>Statistical purposes</td>
<td>Public task/public interest (equality monitoring)</td>
</tr>
<tr>
<td>Dependents</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Religion</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ethnicity</td>
<td>Enrolment</td>
<td>Supporting study goals</td>
<td>Public task/consent</td>
</tr>
<tr>
<td>Attendance data</td>
<td>Through turnstile swipes and also the Student</td>
<td>Supporting study goals</td>
<td>Public Task</td>
</tr>
</tbody>
</table>
| Attendance Monitoring System | Monitoring attendance | Public Task/ For Tier 4 students this is part of the University’s legal obligations
Safety and security as required | University’s legitimate interests to provide a safe environment |
|-------------------------------|-----------------------|-------------------------------------------------|
| University bus travel         | Through bus swipe system | Monitoring usage
Safety and security as required | The University’s Legitimate interests to provide a safe and secure environment |
| CCTV images                   | Through the CCTV system on campus | Safety and security as required | The University’s Legitimate interests to provide a safe and secure environment |
| Assessment records including marks and assessment feedback | Through Turnitin and the marking process | Undertaking assessment | Required as part of the contract with the University |
| Blackboard usage/library usage | Through accessing Blackboard | Administering courses
Supporting study goals | Required as part of the contract with the University |
| Medical records/disability    | Student Services/mitigation process | To provide support
To assess requests for mitigation in relation to assessment | Contract/medical diagnosis/social care
Consent |
| Records of relevant criminal convictions/DBS check outcomes | University Secretary/Registrar | To ensure students are fit to attend courses | Required as part of the contract with the University/Statutory requirement for courses leading to professional registration/ |

6.3 Your personal data includes your photograph which will be used, where necessary, for the purposes of identifying you in the course of the University’s legitimate business, and will appear on your University ID card and the University's IT systems including the Student Record systems.
7 Disclosures to third parties

7.1 The University will disclose your data for third parties where this supports the educational process or where we are legally obliged to do so and details are contained in the table below.

<table>
<thead>
<tr>
<th>Disclosure to:</th>
<th>Details:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sponsors or funding organisations</strong> (including the Student Loans Company, NHS Bursary system) where a contract exists</td>
<td>In accordance with the terms of the contract (which usually relate to attendance and progress reports). This does not include third parties (such as parents) who may be paying for your studies but with whom no formal contract exists.</td>
</tr>
<tr>
<td><strong>University of West London Students’ Union</strong></td>
<td>For the purposes of your membership of the SU and for the administration of election of Sabbatical officers and other officers. Some data about students’ characteristics are provided to enable the Students’ Union to monitor the effectiveness of their services.</td>
</tr>
<tr>
<td><strong>Data processors</strong> (including Turnitin, Blackboard, Student Attendance Monitoring system, Civitas learning analytics system, Aspire bursary scheme, Digitary)</td>
<td>For the purposes of supporting and recording your learning</td>
</tr>
<tr>
<td><strong>Professional bodies</strong> (e.g. Nursing and Midwifery Council, Law Society etc)</td>
<td>For the purposes of confirming your qualifications and your suitability as a registrant</td>
</tr>
<tr>
<td><strong>NHS Trusts</strong> in England and Wales</td>
<td>Where this is necessary for the purposes of your clinical practice. This is applicable to students at College of Nursing, Midwifery and Health.</td>
</tr>
<tr>
<td><strong>Employers</strong> or other educational partners involved in joint course provision</td>
<td>Where this is necessary for the purposes of your placement(s)/work experience or other off-site study as part of your course.</td>
</tr>
<tr>
<td><strong>The Higher Education Funding Council for England</strong> (HEFCE) and its agents</td>
<td>Such as the Higher Education Statistics Agency (HESA) and the Quality Assurance Agency. You are also advised to refer to the collection notices on the HESA website for further details: <a href="http://www.HESA.ac.uk">www.HESA.ac.uk</a></td>
</tr>
<tr>
<td><strong>Potential employers</strong> or providers of education whom you have approached</td>
<td>For the purposes of confirming your qualifications.</td>
</tr>
<tr>
<td><strong>Local Government Departments</strong>, including Council Tax and Electoral Services</td>
<td>For the purpose of assessing and collecting Council Tax and or supporting your registration to vote in elections.</td>
</tr>
</tbody>
</table>
UK Agencies with duties to safeguard immigration and prevent crime or fraudulent activity

For example: SLC, the Police, the UK Visa and Immigration (UKVI) as necessary, and with consideration of your rights and freedoms.

7.2 The University may from time to time make other disclosures without your consent. However, these will always be in accordance with the provisions of the General Data Protection Regulations.

8 Transfers to countries outside the EU

8.1 Sometimes to achieve the purposes for which we are processing your personal data we may need to share your personal data with other organisations based within the European Union or if outside the European Union based in countries that have comparable levels of protection.

8.2 When it is necessary to share your data with organisations outside of the European Union, we will ensure that there are appropriate safeguards in place.

9 Retention of your data

9.1 Your data will be retained as set out in the University’s Records Retention Schedule which is available here.

10 Your Rights

11.1 Under the GDPR you have a right to request a copy of your personal data held by the University. The University is required to fulfil this request within 20 working days. You may make the request via the form for this purpose.

11.2 You also have the right to:

- withdraw consent where that is the legal basis of our processing;
- rectify inaccuracies in personal data that we hold about you;
- request to remove some personal data we hold about you (this will not apply to your basic student record or data held as part of the University’s legal obligations)
- restrict the processing in certain ways;
- object to certain processing of your personal data by us.

11.3 Please see https://ico.org.uk/ for further information on the above rights. You may also contact the Data Protection Officer for further information (university.secretary@uwln.ac.uk).

11.4 You have a right to complain to the Information Commissioner’s Office about the way in which we process your personal data. Please see https://ico.org.uk/.

12 Unwanted communication

12.1 We will from time to time communicate with you by email, post and telephone. If, at any stage, you are concerned about the content of these communications, e.g.
unwanted marketing information, or wish to change the method of communication that we use please unsubscribe to general email communications.

12.2 If you are unsuccessful in unsubscribing from our communications and/or remain concerned, please contact our Data Protection Officer.

13 Your Responsibilities

13.1 You have a responsibility to keep your personal details accurate and up to date and should notify the University of any changes through MyRegistry.

13.2 Students at the University may, during the course of their studies, have access to personal information about other individuals. Students are expected to treat this in a responsible and professional manner. You have responsibilities under the GDPR for any personal data relating to other people which you may access whilst at the University. This responsibility is in addition to any obligations arising from professional ethics or codes of conduct. Information obtained in the expectation of a duty of confidence should be treated as confidential and generally not disclosed without the subject's consent. The University will take a serious view of any breach of the GDPR by any of its members, including the consideration of disciplinary action.
Appendix 1

Lawful basis for processing your data under GDPR

GDPR is new law and it has not yet been applied to circumstances similar in context to our relationship with students. The extent of lawful grounds for processing data has yet to be fully understood. Table 1 gives the University’s present view on the grounds for processing against each specified purpose. As legal views mature the University may change its views on its legal basis for processing.

Consent – on specific occasions the University will only process certain data if you consent e.g. provision of medical records for the purposes of mitigation.

Necessary for the performance of your student contract – on many occasions the University will process your data to enable it to meet its commitments to you e.g. those relating to teaching and assessment.

Necessary to comply with a legal obligation – the University does have legal obligations to provide your personal data to others e.g. HESA. Where you are on a course leading to a professional qualification we also have a legal requirement to provide data on your studies and character.

For the purpose of protecting the vital interest of yourself or another – sometimes in extreme circumstances the University will have to release information to protect your interests or the interests of others e.g. in medical emergencies.

Processing necessary for the performance of a task carried in the public interest – the University is an educational establishment and in particular its educational activity is conducted in a public interest (including your interest and the interest of others). This includes ensuring that you are engaged in your studies.

Processing is necessary for the purposes of the legitimate interest of the University or a third party subject to overridden interests of the data subject – the University (and sometimes third parties) has a broad legitimate interest in activities that connect to the activities and education of students. Subject to those interests not being overridden by the interests of fundamental rights and freedoms of students, it will pursue those interests. A good example of this legitimate interest would be the University’s Alumni activities or the use of CCTV to ensure that the campus is safe and secure.

Automated decision making necessary for performance of a contract – the University may sometimes automate decisions relating to its services it is providing to you.

Processing “special categories” of data

Consent – the University will process certain sensitive information about you with your consent for example the use of ethnicity to ensure that you are not disadvantaged in your study goals.

Necessary for reasons of substantial public interest. This includes monitoring according to characteristics such as ethnicity or disability to ensure equality of opportunity. This is also the basis for processing data in relation to Counselling.

Necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment. This would relate to the provision of
services through Student Services such as your Individual Support Plan or other support.

In connection with legal claims.

It is recognised that some of the above grounds will overlap and that the University could rely on multiple grounds justifying its lawful processing.

The University also reserves the right to rely upon other grounds that are not referred to under table 1.