

Student Privacy Statement

University of Wales Trinity Saint David (UWTSD) is the data controller and is committed to protecting the rights of students in line with the UK Data Protection Act 2018 (DPA) and the new General Data Protection Regulation (GDPR). UWTSD has a Data Protection Officer who can be contacted through foi@uwtsd.ac.uk.

This statement explains how the University handles and uses your personal information during your time as a student and after you graduate. The University is committed to protecting your information and being transparent about what information it holds. The University has a data protection policy in place which can be found at www.uwtsd.ac.uk/data-protection

Personal information may be collected by a number of departments of the University and fair processing notices will be provided at the point of collection as required.

What information do we collect about you?

UWTSD will collect information about you in the course of its dealings with you as a current or former student, for example when you apply, when you enrol and as you progress through your programme of study. We may also receive information about you from outside the University, such as information from UCAS relating to your UCAS application, as well as information supplied by referees. The types of personal information processed includes, though is not limited to, the following:

- Contact details and other information submitted during the application and enrolment processes.
- Details of programmes of study, modules, timetables and room bookings, assessment marks and examinations.
- Financial and personal information collected for the purposes of administering fees and charges, loans, grants, scholarships and hardship funds.
- Photographs, and video recordings for the purpose of recording lectures, student assessment and examinations.
- Information about an individual's engagement with the University such as attendance information and use of electronic services such as the Virtual Learning Environment.

- Contact details for next of kin to be used in an emergency.
- Information related to the prevention and detection of crime and the safety and security of staff and students, including, but not limited to, CCTV recording and data relating to breaches of University regulations.
- Information gathered for the purposes of equal opportunities monitoring.
- Information relating to the provision of advice, support and welfare, such as data relating to the use of the services offered by the Student Services.
- For international students: Copies of passports, visas and any other documents required to ensure compliance with Home Office requirements as well as biometric data for attendance purposes. The University will also hold attendance detail for home students.
- For UK and EU students: Copies of passports or any other documents required to ensure eligibility to receive financial support from the UK government and in compliance with right to study and identification requirements.

How will your information be used?

Although it is not possible to state every purpose for which your information will be used, the following are examples of how it is likely to be used while you are a student.

The number in brackets refers to the **legal basis** as defined by the GDPR Regulation and detailed in the table below, relied upon by the University, in order to lawfully process your data.

- To administer your studies and record academic achievements (e.g. your module choices, examinations and assessments, and the graduation programmes) (1).
- To assist in pastoral and welfare needs (e.g. Student Services) (2).
- To administer support for all your employability needs (e.g. accessing careers advice). To ensure you have access to a range of employability services that complement the University's own resources. Your information will be held after you graduate in order to ensure you maintain access to the full career development support that the University offers all of its graduates (3).
- To administer financial aspects of your enrolment as a student (e.g. payment of fees, debt collection) (1).
- To provide or offer facilities and services to students (e.g. sporting facilities, computing facilities and the Library) (1).

- To carry out investigations in accordance with academic and student-facing regulations, policies and procedures (1).
- To operate security, disciplinary, student facing complaint, appeal and quality assurance processes and arrangements (1)
- To produce management statistics and to conduct research into the effectiveness of our programmes of study as well as produce statistics for statutory purposes (4), (5).
- To monitor engagement of all students with their studies and those on Tier 4 Visas to ensure compliance with their terms of their sponsorship (4).
- To maximise individual's opportunities to succeed through the use of learning analytics which are used to monitor individual's engagement with their studies. This will involve the processing of data such as attendance, assessment and VLE (Virtual Learning Environment) usage to develop an overall picture of engagement. Such processing will only take place where it is necessary for the pursuit of the legitimate interests of the University or the student and only where the processing is not unwarranted and will not cause a prejudicial effect on the rights and freedoms, or legitimate interests, of the student. Sensitive / special category personal data will only be processed where the University is looking at trends and pattern analysis to produce management statistical reports (3), (5).
- To monitor our responsibilities under equal opportunities policies (4), (5).
- For Higher Education Statistics Agency (HESA) purposes - UWTSD is required to send some of the information which we collect about students to HESA for statistical analysis purposes (4), (5). Please see <https://www.hesa.ac.uk/about/regulation/data-protection/notices> for information on how your personal data is used by HESA.
- For Higher Education Statistics Agency (HESA) and/or a third party under contract, to conduct 'to conduct external benchmarked surveys such as the National Student Survey, the UK Engagement Survey, and the Postgraduate Taught and Research Experience Surveys as well as the Graduate Outcomes Survey which takes places after you graduate.
- For Council Tax exemption purposes where personal information is collated at enrolment and shared with Local Authorities (3).
- For voting purposes: where your consent has been provided UWTSD will liaise with the relevant County Borough (for example City and County of Swansea, Ceredigion or Carmarthenshire) and register you to vote in the UK local and General Elections (2).
- To make contact with you after you graduate about alumni membership and events, continued career support, professional networking opportunities, professionally focused events, the Graduate Outcomes Survey, new

developments at UWTSD and to update your communication preferences to ensure your experience of the UWTSD Alumni Association is as rewarding as possible.

- Where consent has been provided, the University will also share ethnicity data to enable the Student Union to monitor and promote BAME engagement (3), (2).

Legal basis for processing your information

1. When you enrol as a UWTSD student, the University will be required to collect, store, use and otherwise process information about you for any purposes connected with teaching, support, research, administration, your health and safety and for other reasons **deemed necessary for the performance of your contractual agreement** with the University. We will also use your information for certain purposes after you cease to be student. See GDPR Article 6(1)(b).
2. The University will obtain **consent** from you in order to assist with your pastoral and welfare needs (e.g. the counselling service and services to students with disabilities). See GDPR Article 6(1)(a).
3. Processing of your personal data may also be **necessary for the pursuit of our legitimate interests or by a third party's legitimate interests** - but only where the processing does not fall within our core public function, is not unwarranted and will not cause a prejudicial effect on the rights and freedoms, or legitimate interests, of the student See GDPR Article 6(1) (f).
4. Processing of your personal data is necessary **for the performance of a task carried out in the public interest or in the exercise of official authority vested in the University** (see GDPR Article 6(1)(e)) and for statistical and research purposes (see GDPR Article 89).
5. Processing of Special Categories data is necessary for the **statistical and research purposes** in accordance with article 89(1) based on the duties in the Equality Act 2010 (see GDPR Article 9(2)(j)).

Who receives your information?

Where necessary, personal information will be shared internally within Faculties and with other departments across the University. Personal information is protected by the University and information will not be disclosed to third parties without consent, or as permitted by law.

This section outlines the major organisations and the most common circumstances in which we disclose information about students. Where this involves international

transfer, information will only be transferred if it meets the conditions set down under current Data Protection legislation.

- Higher Education Statistics Agency (HESA) - UWTSD is required to send some of the information which we collect about students to HESA for statistical analysis purposes and for the purposes of surveys such as The National Student Survey and the Graduate Outcomes Survey as well as the Teaching Excellence and Graduate Outcomes Framework (TEF). Please see Addendum for more details in relation to surveys.
- Further information about how and why HESA and other controllers of data process your data, the legal bases for this processing and your rights under data protection legislation can be found on the HESA Website at <https://www.hesa.ac.uk/about/regulation/data-protection/notices>
- The Higher Education Funding Council Wales (HEFCW) in line with our statutory responsibilities.
- UWTSD is licensed to sponsor migrant students under Tier 4 of the points-based system. The University will provide data about students on the Tier 4 Student Visa to the Home Office and its departments in order to fulfil its duties under its license.
- To sponsors and parents where consent has been provided or where circumstances are significant and would be permitted under common law or statute.
- Other Higher Education Institutions: if, for example, your programme of study involves spending a period of time at an institution outside of UWTSD, including at an HEI abroad, or if you have come to the University as a visiting or exchange student, we may need to share information about you with the other institutions involved in the exchange. This is for administrative purposes and so that the other Institution can carry out its duties in regard to your studies.
- Professional bodies (e.g. the Law Society) in order to confirm your qualifications and accredit your programme of study where appropriate.
- Work placement sites or educational partners involved in joint course provision and students undertaking volunteering opportunities as a part of their studies.
- The Student Loan Company to confirm enrolment, attendance and identity in order that students can access financial support.
- Debt recovery and control companies in order to recover debt on behalf of the University, where internal debt recovery procedures have been unsuccessful.
- Potential employers or providers of education whom you have approached UK agencies with duties relating to prevention and detection of crime, collection of a tax or duty or safeguarding national security.

- Plagiarism detection service providers in accordance with the contract.
- Local Authorities for purposes of council tax exemption where it is necessary for the pursuit of the legitimate interests of the Local Authorities or the student but only where the processing does not fall within our core public function, is not unwarranted and will not cause a prejudicial effect on the rights and freedoms, or legitimate interests, of the student.
- Local Authorities for voting purposes: where your consent has been provided the University will register you to vote in the UK local and General Elections.
- UWTSD Students' Union where it is necessary for the pursuit of the legitimate interests of the Student Union or the student in order to take part in democratic processes, benefit from representation services, join sports clubs and societies and receive communications. Where consent has been provided, the University will also share ethnicity data to enable the Student Union to monitor and promote BAME engagement.

Any other disclosures that UWTSD makes will only be in accordance with Data Protection Legislation.

How long will your information be held?

UWTSD will retain your personal information in line with the University Records Retention Policy.

After graduation the University will need to maintain some records in order that it can verify awards, provide transcripts of marks, to provide academic references for career support. and maintain accurate contact details for the Graduate Outcomes Survey.

Security of your information

Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, while paper files will be stored in secure areas with controlled access.

Some processing may be undertaken on the University's behalf by an organisation contracted for that purpose. Organisations processing personal data on the University's behalf will be bound by an obligation to process personal data in accordance with Data Protection legislation.

What are your rights?

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information. If you have provided consent to UWTSD to process any of your data then you also have a right to withdraw that consent. Any requests or objections should be made in writing to the University Data Protection Officer:

Paul Osborne.
Data Protection Officer
University of Wales Trinity Saint David
Swansea Business School,
High Street,
Swansea, SA1 1NE.
Email: foi@uwtsd.ac.uk
Tel: 01792 481000

How to make a complaint

If you are unhappy with the way in which your personal information has been processed you may in the first instance contact the University Data Protection Officer using the contact details above.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF
Website: www.ico.org.uk

Your responsibilities

You have a responsibility to keep your personal details up-to-date. During the course of your studies, you may have access to personal information about others. You are expected to treat this in a responsible and professional manner and are legally required to do this under Data Protection legislation, as well as any professional ethics or codes of conduct.

If you are made aware of personal information in confidence then you are expected to not tell anyone without the individual's consent, unless there are exceptional circumstances. You should also not seek to gain others' personal data if you are not entitled. Disciplinary action will be considered for any University member who breaches Data Protection Legislation or a duty of confidence.

Addendum

UK Engagement Survey (UKES) and Postgraduate Experience Survey (PTES) additions

For the UK engagement survey (UKES) and the Postgraduate experience survey (PTES), University of Wales Trinity Saint David (UWTSD) is the data controller and Advance HE and JISC are the data processors.

As such, Advance HE and JISC, will have access to all data for the purpose and means decided by UWTSD. Advance HE and JISC may also share this data with sub-processors working on its behalf.

Examples of the purpose and means of data collection in relation to the UKES and PTES includes but is not limited to:

- To help the University better understand what your learning experience has been like
- To provide useful information for prospective students
- To inform areas for service improvement across the University
- To inform good practice across the University
- To provide us with a benchmark in relation to other institutions

For further information with regard to the purpose and means of data collection and the role of UWTSD as the data controller, please see information below.