

## STUDENT PRIVACY NOTICE

This page provides information about the use of 'personal information' when you became interested in being a student at Glyndwr University, when you are registered/enrolled as a student at Glyndwr University and after you have graduated.

### What is 'personal information'?

'Personal information' means any information which relates to or identifies you as an individual.

### How we handle personal data of current students

Under the Data Protection Act 2018 Glyndwr University is a Data Controller and we are therefore legally responsible for the personal data we collect and hold about you. One of our responsibilities is to tell you about the different ways we collect and use your personal data. This privacy notice is a statement that provides details about these uses.

### Where does the University get your personal data from?

We obtain personal data about you from the following sources:

- from you when you provide your contact details for open day activities or register as a student with us;
- from third party sources (e.g. UCAS, other institutions involved in joint programmes or the Student Loans Company). When we obtain personal data about you from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data.

### Who will process my personal information?

- The information published here applies to the use, sharing and disclosure of your personal information by Glyndwr University

### What personal information will be processed?

The University will keep a record of the details you provided on your application form, any supporting documents requested as part of your admission and additional details provided by any referees and recorded following any interview process. We will also maintain records about your studies at Glyndwr, and about your use of the academic and non-academic facilities and services that we offer. This personal information will include information/data such as your name, home address, date of birth, course studied, fee payments, and information about your examinations, assessments and results.

Your personal information is created, stored and transmitted securely in a variety of paper and electronic formats, including databases that are shared between the University and the Student Union (such as the main student records database, SITS). Access to your personal information is limited to the University and other 3<sup>rd</sup> parties as outlined in Table 1 and Table 2 below who have a legitimate interest in it for the purpose of carrying out their contractual duties, and our use of your personal information will not be excessive.

In addition to this, the University may process some information about you that is classed as 'sensitive' or 'special category' personal data, and which requires additional protections. This includes information concerning your ethnicity, sexual orientation, religious beliefs or health/disability that we use for planning and monitoring purposes, or in order to provide care, help or suitable adjustments. For certain courses of study, other sensitive information may be processed, such as information about past criminal convictions, working with children or vulnerable adults, and your fitness to practise in certain regulated professions. Access to, and the sharing of, your 'sensitive' personal data are controlled very carefully. You will normally be given further details about our use of any such data when we collect it from you.

### **What is the purpose and legal basis of the processing of the information?**

The University will process your personal information for a range of contractual, statutory or public interest purposes, these are outlined in Table 1 but it does include the following:

- To deliver and administer your education, record the details of your studies (including any placements with external organisations), determine/confirm your academic achievements (e.g. results, prizes) and to produce award certificates where applicable.
- To communicate with you to request feedback about your Graduation ceremony and the Graduation ceremony planning if applicable.
- Where relevant (e.g. for PhD students), to monitor, evaluate and support your research activity.
- To administer the financial aspects of your relationship with us and any funders.
- To deliver facilities to you (e.g. IT, sport, libraries, accommodation, careers).
- To enable your participation at events (e.g. functions, graduation).
- To communicate effectively with you by post, email and phone, including the distribution of relevant newsletters and circulars.
- To operate security (including CCTV and Body Worn Cameras 'BWCs' where such processing is necessary for the establishment), governance, disciplinary (including plagiarism and academic misconduct), complaint, audit and quality assurance processes and arrangements. Further detail regarding CCTV and BWC's available on the [Information Governance](#) page on our website. To support your training, medical, safety, welfare and religious requirements.
- To compile statistics and conduct research for internal and statutory reporting purposes.
- To fulfil and monitor our responsibilities under equalities, immigration and public safety legislation.
- To enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us).

In general terms, we process your personal data for the administration of your position as a student with us, including the use of our services such as, residential services, lecture capture, attendance monitoring, the Library and sports facilities.

We set out in table 1 of this Notice the purposes for which we will process your personal data in more detail.

## Who will my personal information be shared with?

As described above, your personal information is shared with relevant staff at the University where appropriate to do so and with the Student Union. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations, including the following, this is outlined in Table 1 but it does include the following:

- Higher Education Statistics Agency (see HESA's statement about the uses made by them of your personal information published at <https://www.hesa.ac.uk/about/regulation/dataprotection/notices>).
- Your funders and/or sponsors (e.g., as relevant, the Student Loans Company, your employer, Research Councils, the funders of any awards or prizes).
- The providers of any external/collaborative learning and training placements or fieldwork opportunities.
- Awarding bodies including the University of Wales, the University of Chester and Pearson for confirmation of awards achieved and for the production of certificates if applicable.
- External examiners and assessors, and external individuals involved in relevant University committees or procedures.
- Relevant Government Departments (e.g. Department for Education, Home Office, Foreign and Commonwealth Office, Department of Health).
- Relevant executive agencies or non-departmental public bodies (e.g. UK Visas and Immigration, HM Revenue and Customs, the Health and Safety Executive).
- Relevant Higher Education bodies (e.g. Higher Education Funding Council for Wales, Office for Students, UK Research and Innovation, Universities and Colleges Admissions Service, Office for Fair Access, Office of the Independent Adjudicator, the organisation(s) running the National Student Survey and other student and leaver surveys).
- Any relevant professional or statutory regulatory bodies (e.g. General Medical Council).
- The relevant University student union(s) and student clubs and societies, in order to facilitate your membership of those bodies.
- Local authorities (in particular, we pass lists of students to Wrexham Borough Council on an annual basis to assist with the administration of students' exemption from Council Tax).
- On occasion and where necessary, the police and other law enforcement agencies.
- On occasion and where necessary, auditors.
- On occasion and where necessary, subsidiary companies of the University (e.g. Glyndwr Innovations and North Wales Science).
- Companies or organisations providing specific services to, or on behalf of, the University and/or one or more Colleges.

We will normally confirm details of your results and degrees awarded to external enquirers or organisations, and will provide references to third parties. We will make your examination results publicly available in accordance with our statutory provisions (this may include posting them on the notice boards and publishing them in the local paper). Your name and the type of degree awarded will be published in the relevant graduation programme if applicable.

On occasion, the above types of sharing may involve the transfer of your personal information outside the European Economic Area (e.g. to facilitate your participation in an exchange visit or to report to an overseas funding provider). Such transfers usually are necessary in order to meet our contractual obligations with you, and are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information.

Other than as set out above, we will not normally publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

### **How is my personal information used after I graduate?**

After you graduate a core record of your studies is retained indefinitely so that the details of your academic achievements can be confirmed and for statistical or historical research. We will request your consent at enrolment for the Alumni Marketing Team while you are still a student so that you can be added to the alumni database. A statement for alumni and supporters setting out how their personal information is used by the University is published at <http://alumni@glyndwr.ac.uk>; you will receive more details about us contacting you after you leave the University at graduation time. We hope that you will remain part of our Alumni family.

### **How can I access my personal information?**

You have the right to access the personal information that is held about you by the University. Further details are published at <https://glyndwr.ac.uk/information-governance/subject-access-requests/> or contact [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk)

### **How long is my information kept?**

We store your personal information as part of your student record for the duration of your studies (and it may be used as part of our assessment of any future application you make for further studies at Glyndŵr). Information about how long different types of information are retained by the University is outlined in Table 2 and is also published at <https://glyndwr.ac.uk/information-governance/policies-and-statements/>

### **Who can I contact?**

If you have any questions about how your personal information is used, or wish to exercise any of your rights, please consult the University's data protection webpages at <https://glyndwr.ac.uk/information-governance/> or email [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk) and speak to the University's Data Protection Officer.

Our postal address for data protection issues is Glyndwr University, Plas Coch, Mold Road Wrexham LL11 2AW

Our data controller registration number provided by the Information Commissioner's Office is **Z5199192**

### **How do I complain?**

Please contact the [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk) should you not be happy with the way your information is being handled. If you remain unhappy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk>.

## Are changes made to this webpage?

This webpage was last updated in April 2022. It is reviewed when necessary and at least annually. Any changes will be published here and you will be notified via this webpage and/or by email.

## Additional notices and guidance/policies

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

## Your rights as a data subject

We thought it would be helpful to set out your rights under UK GDPR. You have the right to:

- withdraw consent where that is the legal basis of our processing;
- access your personal data that we process;
- rectify inaccuracies in personal data that we hold about you;
- be forgotten, that is your details to be removed from systems that we use to process your personal data;
- restrict the processing in certain ways;
- obtain a copy of your data in a commonly used electronic form; and  object certain processing of your personal data by us.

Please see <https://ico.org.uk> for further information on the above rights. You may also contact the Data Protection Officer on [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk) for further information.

### TABLE 1

Legal basis for processing your data under UK GDPR

UK 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. Should a change occur, a revised Privacy Notice will be drafted and you will be informed.

**(Article 6(1)(a))**, Consent – on specific occasions the University will only process certain data if you consent e.g. on registration you only need to provide certain “special categories” of data if you agree that that.

**(Article 6 (1)(b))**, 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.

**(Article 6 (1)(c))**, necessary to comply with a legal obligation – the University does have legal obligations to provide your personal data to others e.g. HESA.

**(Article 6 (1)(d))**, 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.

**(Article 6 (1)(e))**, 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).

**(Article 6 (1)(f))**, 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. However, currently, the University is unable to use this lawful process as we are deemed a public authority and public authorities are unable to use this.

**(Article 22(2)(a))**, automated decision making necessary for performance of a contract – the University will sometimes automate decisions relating to its services it is providing to you.

**(Article 9(1)(a))**, processing “special categories” of data where you have given consent – the University will process certain sensitive information about you with your consent.

**(Article 9(1)(g))**, processing “special categories” of data where necessary for reasons of substantial public interest.

**(Article 9(1)(f))**, processing “special categories” of data in connection with legal claims.

<b>Reviewed</b> April 2022	<b>Author:</b> Leonna Messiter	<b>Additions:</b> GDPR updated to UK GDPR Body Worn Cameras (BWC's) included
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