

Student Privacy Notice

This Privacy Notice applies to students studying with the University of London through distance learning and through the School of Advanced Study. This Privacy Notice does not apply to students studying programmes at the University of London Institute in Paris, nor students studying for a University of London award at one of the member institutions. These are all governed by separate Privacy Notices

1. Introduction

The data controller processing your data is the University of London. We are registered as a data controller with the Information Commissioner's Office (our registration number is Z5419651) and we are committed to ensuring that the personal data we process is handled in accordance with data protection legislation. Suzie Mereweather is our Data Protection Officer, and you can contact her at data.protection@london.ac.uk

Further information about how we meet our data protection obligations is available on the <u>Data</u> Protection webpage

This Privacy Notice provides you with information about the different ways we collect and use your personal data, including data you are asked to give during the application and registration processes. You might find you are given further information about the uses of your personal data as you use different services at the University of London.

You will also find data protection referred to in the <u>Student Terms and Conditions</u> which you agree to as part of your Contract with the University

2. What information do we collect about you?

While you are studying with us, we will collect, obtain and hold a range of data about you that may be able to identify you directly or indirectly. If and when you cease to study with us, we will continue to hold some data that we hold about you for a predefined period of time in order to fulfil our remaining tasks and obligations.

The personal data that the University holds and processes about you is the following:

Information to help identify you:

- Your first and last name
- Date of birth
- University Student Reference Number (known as your SRN)
- Contact information (email, address, phone number)
- National Insurance Number, or other tax identification number
- Gender
- Nationality
- Passport number or national identity card details

Information relating to your education and employment history:

- Names and addresses of education institutions you attended
- Dates of study and exam results
- Academic and/or professional references (where required)
- Places of work and vocational qualifications achieved
- Study and assessment data generated during your time with us (this can include your image or voice recorded when you participate in recorded teaching activities including webinars)
- Data on how you access and use our resources (library, websites, virtual learning environment, academic apps)

Information about your family and interests:

- Information about your family,
- Next of kin and Trusted Contacts and their contact details
- personal or lifestyle circumstances, extracurricular interests or information related to bursary applications or to provide you with appropriate pastoral care
- Information about your sources of funding

Special Category data:

The University may collect and process some information about you that is classed as "special category data." Special category data receives additional protections where necessary. The special category data we collect about you is:

- Gender
- Data relating to health and medical conditions
- Racial or ethnic origin
- Religious or similar beliefs
- Sexual orientation
- Criminal convictions
- Data that indicates you may fall into one of our Widening Participation categories

You will be able to choose when you provide the above information whether to share with us certain types of special category data.

3. When do we collect this information?

We collect data about you at various stages in your relationship with us.

The main stages are:

- When you apply to study with the University of London
- When we validate your academic achievements with previous education providers
- When you register with us
- When we meet to verify your identify during registration
- From third party sources (for example, sponsoring organisations, organisations acting on your behalf and Teaching Centres). Where we obtain personal data from third party sources,

- we will look to ensure that the third party meets their data protection obligations when they provide us with your personal data.
- When you communicate with us, via phone, email or via the website (for example, to make enquiries or to raise concerns)
- Throughout your time with us as a student, collating information relating to your work, examinations and other assessments, and studies
- Through engagement with University services, such as careers advice, counselling and financial support. Whenever you engage with one of these services you will be given further details about how your data will be used for this purpose at the relevant time.
- When you go to study somewhere else on a placement or as part of your course of study

4. Why do we collect this information? (Legal bases for processing this information)

The University collects only the data we need, and we keep it only for as long as it is needed. Data protection legislation requires that we have a legal basis for processing your data. Our reasons for collecting and using your personal data are:

We process data to meet our public task.

We process data to ensure that we can carry out our role as an educational and research establishment, meeting legal, moral and contractual obligations as laid out in the University's Statues and Ordinances.

We process data to meet this public task role when we carry out activities to meet our teaching, learning and research obligations such as:

- Student administration, including registration, provision of student ID cards, engagement monitoring, maintenance of the student record and organising placements
- Provision of core teaching, learning and research services, including assessment, managing progress, academic misconduct investigations, graduation and organising course transcripts and certificates
- Quality assurance processes around development and upkeep of courses and modules

We also process data to meet our statutory and legal requirements.

We process your data for this purpose when we:

- Perform monitoring and gathering of information to meet equal opportunities obligations and declarations of "good character" for certain courses
- Report to governmental bodies (including the Office for Students)
- Ensure we are meeting our obligation under equality legislation
- Perform due diligence relating to sources of funding

We process data to meet our contractual obligations.

We process data to meet our contractual duties to you as a student and to provide you with educational and other services as laid out in our Terms and Conditions. We process data to meet these contractual obligations when we:

• Verify your identify as part of registration

- Manage your use of facilities and participation in events
- Provide email and other IT services, access to the University networks and wi-fi, IT accounts and library services
- Administer the financial aspects of your relationship with the University, such as fee payment or liaison with financial or funding providers
- Work with Recognised Teaching Centres to deliver University programmes

We process data in our legitimate interests.

We process data in our legitimate interests when we do something with your data to support you that you might reasonably expect us to do. This is an assessment made by weighing our need to process your data against the impact of the processing on you. Our legitimate interests will never override your right to privacy and the freedoms that require the protection of your personal data. If you are interests in learning more about this legitimate interest assessment, please email us at data.protection@london.ac.uk

We process data for these purposes when we:

- Provide opportunities for student wellbeing and support, including pastoral support, counselling, personal tutoring, and careers services
- Support you through our engagement monitoring
- Administer financial support services
- Enable effective communications with you regarding information you need to know for security or effective operations on our sites
- Enable effective communications with you to involve in the University community, including informing you of services and events that apply to you
- Operate and keep a record of disciplinary and complaint issues; and the fitness to study/practice and other complaints processes
- Ensure the security of our sites and those people within them
- Produce statistics and research for internal improvements in the way the University develops and delivers its courses and programmes
- Secure and provide appropriate insurance cover for our students and manage any claims that may arise

We process data for reasons of substantial public interest.

We process special category data in the substantial public interest when we:

- Collect and use information relating to criminal convictions
- Operate and keep a record of fitness to study/practice procedures
- Operate and keep a record of disciplinary and complaint issues, including managing and appeals to these processes
- Operate and keep a record of academic misconduct and integrity processes
- Operate and manage insurance cover
- To manage requests for special examination arrangements, extenuating circumstances considerations or to consider any accessibility issues you raise
- To analyse equality and diversity information for statistical purposes

We process with your consent

We may process special category data with your consent when you engage with certain optional services, particularly those that provide:

- Additional learning support services
- Extenuating circumstances
- Some placements or knowledge exchange partnerships
- Counselling or emergency support

We also liaise with family members or next of kin where you have provided us with their details.

5. What do we do with your information?

The University processes personal data and special category data in accordance with data protection legislation and its own data protection policy.

We combine the data you provide to us at registration with other data generated during your time with the University in order to maintain a summary record of your academic journey with us. This is stored in our student management system (SITS). We also use personal data to support you during your time studying with us.

Personal data is used for the purposes described above to meet the following primary purposes:

- Student administration, including engagement monitoring to offer you support if you appear to have disengaged with your studies
- Provision of core teaching, learning and research services
- Provision of email and other IT services, access to the University networks and Wi-Fi, IT accounts and library services.
- Student wellbeing and support, including pastoral support, counselling services, personal tutoring, careers and employability services.
- Financial administration, including fee payment or liaison with financial or funding provider
- Complying with statutory requirements, including those relating to sanctions
- Keeping you involved in the University of London community, including informing you of other courses and services available to you

6. How long do we keep your information?

We keep your personal data for as long as it is required to perform its purpose or for as long as is required by law. We keep all information while you are registered with us. After you graduate or cease your studies, we keep certain types of information for defined periods of time:

- A transcript record of your results and qualifications will be kept permanently by the University
- We will retain your academic work for as long as the time you have to make an academic appeal. When that time has passed, we will securely dispose of it.
- We will retain other data collected on you for appropriate periods based on risk and necessity

- On graduation, or completion of your studies, you automatically become alumni of the
 University of London and a member of its Alumni Network. For further information on how
 your data is stored please see: https://london.ac.uk/support/development-office-data-protection-statement
- If your application does not lead to registration, we will retain your record for three years and provide periodic information and reminders about other courses and study opportunities

7. Who do we share your information with?

Your information may be shared internally and with external third parties.

Internally

Your information may be shared internally with:

- Academic staff, student support staff, your personal tutor and other tutors who are involved in delivering your course of study.
- Careers and employability services, so that they can support you.
- Finance teams, Library, Security staff and wellbeing staff, if access to the data is necessary for performance of their roles.
- IT Services, to provide you with an IT account, email address and access to relevant buildings, IT networks, systems and resources.
- Our Internal Audit team, to ensure University compliance with policies and processes.
- The Development Office, for them to contact you regarding ongoing involvement with the Alumni of the University. The Development Office have their own privacy notice which you can find on their webpage, and you will be given further information about this at that time

Externally

We share your personal data where required with the following external third parties:

Organisations that assist in the delivery and assessment of your studies

The University will share your personal data with the organisations that assist in the delivery and assessment of your studies. These include:

- member institutions of the federal University of London, teaching consortiums and examination centres.
- Recognised Teaching Centres, where you are studying at a University of London Recognised
 Teaching Centre or where you are included in a recording shared with Recognised Teaching
 Centres to support studies

Employees, agents, and contractors

- Third parties who provide IT support
- Third parties who support financial transactions
- Organisations operating anti-plagiarism software on our behalf
- Third parties who provide our virtual learning environments, such as Moodle or Coursera.
- Third parties who provide another service, such as online learning tools

- Third parties who provide our online assessment platform
- External auditors, to ensure University compliance with policies and processes
- Third parties who act on our behalf to recover money you owe us
- Third parties who conduct surveys
- Insurance brokers and insurers and related third parties, such as lawyers and loss adjustors
 for the purpose of risk mitigation, security insurance cover, maintaining and administering
 that cover and processing any claims that may arise as a result.

Those with an interest in tracking student process and attendance

- Funders and sponsors
- Current or potential education providers or employers where you take part in an exchange or placement as part of your course
- Current or potential employers, to provide references

Professional and regulatory bodies, in relation to the confirmation of qualification, professional registration and conduct and the accreditation of courses

Where your registration includes qualifications and accreditations relevant to your membership of a professional body, the university will share or validate relevant information about you with that body. This includes:

- Health and Care Professionals Council
- British Psychological Society
- Association of Chartered and Certified Accountants

Government departments and agencies where we have a statutory obligation to provide information

- The Office for Students (OfS)
- The Higher Education Statistics Agency (HESA) you can view the <u>HESA Collection notice on</u> their website
- Council Tax and Electoral Registration Officers for the purpose of assessing liability for Council Tax and for electoral registration purposes
- The Home Office

Crime prevention or detection agencies

- The police
- Department for Work and Pensions

8. How do we protect personal data transferred overseas?

Some of the personal data we process about you may be transferred to and stored outside the UK (United Kingdom). This may happen where it is processed by members of University staff, staff of one of our suppliers, or staff at a Recognised Teaching or Examinations Centre who operate outside the UK. In some cases, our suppliers host data on our behalf outside of the UK.

All transfers of personal data to overseas agents are bound by an appropriate contract which sets out how they will handle your data in accordance with UK data protection legislation.

9. What rights do you have in relation to the way we process your data?

As an individual whose data we process, you have certain rights in relation to the processing. You can find detailed information about **your rights as a data subject.** You have the right to:

- Withdraw your consent for us to process your personal data where we have relied on that consent as our basis for processing your data.
- Ask us to confirm that your personal data is being processed and to gain access (i.e., have a copy) of that data as well as to be provided with supplemental information about the processing.
- Request that we rectify any inaccuracies where the data we hold on you is inaccurate or incomplete.
- Have your data erased by us, although in certain circumstances we may not be able to do
 this. The circumstances where this applies can be found in the <u>guide to data subject rights</u>
 information.
- Restrict the processing of your personal data in certain ways.
- Obtain your personal data for reuse.
- Object to certain processing of your personal data.

If you would like to exercise any of your rights, please look at the information available on the <u>data</u> <u>subject rights webpage</u>

10. Where is there more information on this?

You can find out more at the University's <u>Data Protection page</u>. If you have any concerns about the way that we have handled your personal data, you can **email the Data Protection team.**