

## Student Data Privacy Notice

This Privacy Notice explains how we, University College Birmingham (the “**University**”) of Summer Row, Birmingham, B3 1JB, telephone number: 0121 604 1000, use the personal data we collect. The University collects personal data from you when you enrol here to study a course. The information may be added to from other sources such as the Government’s Personal Learner Record, UCAS or Student Finance to ensure accurate information is held. We will also update information such as results as you progress. Attendance on your programme is also stored against your record.

We are the data controller for such personal data relating to you and this Privacy Notice explains how we will process your personal data. Personal data is held on various systems within the University and, in some cases, in paper form. All of the information we hold is held securely and only authorised staff can access it. The information that we collect will be held in accordance with the UK General Data Protection Regulation (the “**UK GDPR**”), the Data Protection Act 2018 (the “**DPA**”) and related legislation (collectively “**Data Protection Law**”).

The University’s Data Protection Officer is the Head of Information Services:

Ruth Cartwright

Address: University College Birmingham, Summer Row, Birmingham B3 1JB

Email: [dataprotection@ucb.ac.uk](mailto:dataprotection@ucb.ac.uk)

Telephone: 0121 604 1000

### **There are certain principles that the University must adhere to. This means that we will make sure your information:**

- Is treated fairly and is only used for the purposes for which we have collected it and for which we have a legal basis for processing.
- Will only be used for the purposes for which it was collected, unless we ask your permission to use it for something else.
- Will not be excessive. i.e. We will not hold information about you that we do not need.
- Will be accurate. You can help us with this by making sure your details are correct on the student portal.
- Will not be kept longer than is necessary, although some of the data will be archived so that we can still confirm your course, attendance and achievement in the future.
- Will be kept securely so that there is no loss of data or data breaches. Personal data is kept on secure servers and any hard copies are kept in secure locations. Only authorised people have access to your personal information.
- We will ensure that, where personal data is shared or stored outside of the European Union, there are appropriate safeguards in place to protect your personal data. Any third party organisations that hold personal data (e.g. cloud hosting) will have confirmed their compliance with Data Protection Law before data is processed.

## **You have certain rights as a data subject under the Data Protection Law. This means that you have:**

- The right to gain access to your personal data – You can ask us what information we hold on you. \*
- The right to rectification – You can ask us to put right any information that you believe is incorrect or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed.
- The right to erasure – You can ask for information to be removed, although this is a limited right which applies, among other circumstances, when the data is no longer required or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.
- The right to restrict processing – If you feel you are being disadvantaged by us holding information that is inaccurate, you can ask us to stop processing it until we fix it or come to an agreement.
- The right to data portability – You can ask us to extract your information so that you can use it elsewhere.
- The right to object – You can object to us processing your data for marketing purposes. You can also object to us processing your data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.
- Where the legal basis for processing your personal data is based on your consent, the right to withdraw your consent at any time.
- Rights in relation to automated decision making and profiling – however, the University will never make any decisions about you without any human intervention.

*\* There are certain exceptions where data access may be limited e.g. student grades and course classifications cannot be provided until exam board approval and release date. You will be informed at the time of your request if there is a restriction on the data that you have requested.*

For any information on your rights, or if you have questions or concerns, please contact the Data Protection Officer.

You also have the right to complain to the Information Commissioner's Office (ICO) if you feel that the University is not processing data correctly. You can make a complaint on the ICO's website: <https://ico.org.uk/> .

## **Why does the University need information about you and what is the purpose of our processing?**

We only process data for specified purposes and if it is justified in accordance with data-protection law. Specifically:

- We need to know who you are, so we will need to check official ID to make sure our information is accurate. Our information must be accurate so that any certificates we produce are correct.

- We need to assess your eligibility for the course that you have chosen to do, so we need information about your previous qualifications and education.
- We need to assess if you have any tuition fees to pay and this is based on information such as age, previous qualifications and where you live.
- We need to be able to contact you about your course, so we need up-to-date contact information. e.g. online enrolment.
- We have an obligation to monitor equal opportunities and diversity and to send information of this nature to Government agencies, so we need some information that is considered “Special Categories of Data” such as ethnic origin, sexual orientation, religion or gender reassignment. We will take special care of this and make no decisions about you based upon it. You have the right to refuse to answer these questions when asked and we can state that you have chosen not to answer.
- We may wish to assess whether you need some extra support with your course. For example, you may have a medical condition that we need to be aware of, or you may have specific learning needs that we can support you with.
- Your information may be used to assist in finance and welfare activities.
- All education providers have to provide information to Government agencies. Much of the personal information that you give us will be included in this. They use it for assessing the amount of funding we can receive from them and also to produce statistical analysis of the current students in education. They may also use it to contact you for the National Student Survey. They may also use it to contact you for the Graduate Outcomes survey which assesses how well our graduates are doing after they leave us.
- We may need your information in the event of discipline or grievance actions.
- We need to monitor your progress on the course, so we will add data into your record such as attendance, marks and grades achieved.
- We may need to organise placements for you, or to help you organise a placement.
- You may ask us to provide a reference.
- We may need information if you are going on a trip.
- Our library will use your personal information in their library system so that you can access all the resources.
- Your information will be used if you choose to get counselling, guidance or help with careers.
- We need to ensure we comply with health and safety guidance.
- We may need to communicate with you regarding various opportunities that may be available to you, such as progression, alumni offers etc.
- We need to make sure that the University is kept secure, so you will have an ID created from the information that you give us and your access to the University will be recorded.
- We may need to respond to Police requests/checks.
- Some data will be used in analytical reports to monitor outcomes at the University.
- Certain analytical information may be drawn from our systems in order to support students and to enhance their teaching and learning engagement using cloud technology. Where possible any data analysis will be anonymised in order to protect identity.

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- **What personal data do we hold?**

Examples of the data that we collect from you on your enrolment form or that comes directly from UCAS and the data that we add is listed below. We may not have all of this information for you as some depends on the course that you are doing, whether you are home, EU or overseas, whether you have needed to access some of the University's facilities etc.

**Biographical Details:**

Name, Date of Birth, Gender, Ethnicity, Nationality, Country of Domicile, Title, ID numbers from various sources such as UCAS, Student Finance, Unique Learner Number etc., Gender assigned at birth, sexual orientation, NI number (teacher training and apprentices only), religion, disability, learning difficulty, criminal convictions, teacher reference number (for trainee teachers only), your previous institution name and the date you left there, the occupation of your parent/guardian (or your own occupation if over 25), a flag to show if your parents went to University, care leaver information, national identity, employment status, medical information where required, DBS Clearance (where required).

The above biographical details are held in order for the University to meet our obligations in collecting data for Government agencies and, if necessary to register you with awarding bodies. Some of the data will also be used to produce certification. We will also use it internally for the management of teaching and learning.

ID card image – This is held for identification and security purposes and for confirming your attendance on campus.

We will keep copies of any identification brought in (passport, birth certificate).

**Contact Details:**

Address – permanent and term time, next of kin/emergency contact name and number, email address, parent/guardian email address, phone numbers.

This is used for contact purposes and postcodes are included in the Government returns.

**Financial Information, Fees and Loans:**

Invoices and credit notes relating to any amounts due to the University from you (e.g. tuition fees, accommodation fees). Any instalment plans. Amounts paid by you or your sponsor. Any outstanding debts.

Codes within the student record show any fee waivers that we may have offered, such as no fees paid due to being on a further education course and aged under 19, or scholarship information. Fields may include the amount of fee you are charged, who is paying the fee, reasons for non-payment (such as fee waivers), eligibility to pay home fees, any government funding, student loan information. Student loan application information shared from Student Finance England.

We will keep copies of your proof of eligibility for fee waivers such as benefit letters for audit purposes.

Any financial support given to you, such as help with transport costs will be flagged. Bank account information will be held if we have paid money directly into your bank account at your request (e.g. deposit refund).

#### **Progress Tracking and Education-Related Information:**

The course(s) that you are undertaking/have undertaken, the year of the course and any modules attached to the course.

Information to track your progress such as, your start date, whether you are full or part time, any breaks in study (deferrals), any grades and marks for exams, assessments and assignments. Final classifications and date achieved. Any repeat or resit requirements. Attendance marks. Any notes from discussions with your lecturers regarding progress, information on any extenuating circumstances. Exam and dissertation concessions information. Number of hours on the course. Additional Support Costs, High Needs/Education Health Care Plan flag, any disciplinary proceedings. Exemptions, Accreditation of Prior Learning, results of any appeals.

Information to show how much you interact with various UCB systems such as Canvas, the Library etc.

Information to show if you studied/worked abroad as part of your course, where you were and for how long.

Placement information for those who undertake work experience. – dates and providers, reports, attendance, CV.

Information relating to any complaints/grievances you may have addressed at the University.

Assignment/Dissertation/Assessment copies and recordings

Information and recordings for online proctoring. i.e. examinations and assessments taken online and recorded for invigilation purposes.

Registrations with awarding bodies.

#### **Lecture Capture**

In order to make lectures and classes available to students online, some lectures and classes may be recorded. In most cases, the audience will not be seen, but it is possible that image and voice may be captured during this process.

Some practical classes may be recorded in order for lecturers to show you how you performed during a practical lesson, e.g. kitchen service.

## **Application Information and Entry Qualifications**

Information on the qualifications you had when you applied to the University. This may include the awarding body, the date achieved, the subject, the level, the grade. Previous degree information for trainee teachers. Personal statements made through UCAS, or on your application form, offers made, interview invitations, your decision whether to accept the place and copies of certificates/transcripts.

Information you discussed or provided to our Academic Support Team (if any) may be stored on our student portal for access by relevant members of staff only to ensure they can support any additional needs you may have.

## **Non-EU Student Information**

In order to comply with Border Agency regulations, we hold the following for non-EU students:

Country of Birth, Place of Birth, Passport Number, Passport Issue Date, Passport expiry date, place of issue, ID card number, Visa information, Work permit Type, Visa Number, Visa Expiry Date.

Our International Office is required to share this information with the UK Border Agency and to inform them of any withdrawals or lapses in attendance.

## **Destination of Leavers/Graduate Outcomes**

After you leave the University, we are obliged to contact you to find out how you are getting on. We will hold the following information based on your responses:

Current activity e.g. Working/studying, current job, current employer, salary, how you found out about the job, whether you had worked there before, current study information such as place of study, type of course, subject of course and your opinions of how you feel about your experience of Higher Education at the University.

You may be contacted by HESA in order for them to collect graduate outcomes. Once collected, they will send this information to us and we will store this as above. It will be analysed and individuals will not be identifiable in any reports produced.

## **Alumni**

When you leave the University, some of your data, if you have given your consent, will be transferred to our Alumni system. It will be used to contact you regarding Alumni activities, careers etc.

## **CCTV**

CCTV is used within the University for security reasons and your image may be recorded.

## How long will we hold your data?

Hard copies of student information will be archived and destroyed after 7 years.

The Student records system data will be held on file after graduation for a period of at least 7 years. In order to confirm academic history to future employers, other institutions etc. at the request of the student, we will continue to hold information after 7 years. If at any point after the 7 years the student request deletion of their information, then this will be carried out.

Online proctoring recordings will be deleted from the Respondus server after two years.

It may be possible to remove any excess information that would not be required to confirm this.

CCTV data will be deleted after 31 days.

Library records are deleted annually unless there are outstanding issues such as overdue books or outstanding fines.

The University has a Data Retention Policy with further information, which can be found here: <https://www.ucb.ac.uk/media/otqi5a3v/data-retention-policy-13.pdf>

## Who might we share your information with?

On occasion we may need to share your data internally and with third parties. The following is a list of organisations with which we may share information. It is not an exhaustive list, but any organisation with which we share information will have confirmed their compliance with the Data Protection Law.

- Our administrative/ IT staff
- Awarding bodies
- University of Warwick (for qualifications awarded by Warwick) in order to track, certificate and include in Warwick's Alumni
- Student Loans Company
- Statutory Government bodies
- Regulatory Bodies
- Professional Bodies
- External Examiners/Verifiers
- Local Authorities
- The Guild of Students
- University's Medical Advisor
- Internal and external auditors
- Employers/sponsors
- Placement providers
- Franchise organisations
- Parents/Guardians/Next of Kin
- University and Colleges Admissions Service (UCAS)
- DFE
- Counter Solutions (Way2Pay EPOS System)
- Solutionpath – Stream (Analytics) and their sub-contractors

- Accrediting authorities
- Canvas (Cloud Hosting Only)
- Data Harvesting/Amazon Web Services (Cloud Hosting only)
- Student CRM
- Dotmailer
- Eventbrite
- Canto
- Survey Planet
- Unibuddy
- Click4Assistance
- Data Bubble
- Mailchimp
- InLine Marketing
- JanetText
- PageOne
- Orlo
- StoryComms
- UK Border Agency
- Library Online resource providers
- Electoral Registration Officers
- Abintegro (Careers Service)
- Software providers that the University use may need access to resolve IT issues
- Cloud Technology providers
- Advance HE and Student Voice for potential student surveys and analysis
- Credit Control Agencies where necessary for debt collection purposes
- Respondus – Online proctoring
- Relevant authorities dealing with emergency situations at the University\*
- Aspire – John Smith’s (Kickstart Scheme) (where applicable)
- We may need to refer information to internal support contacts to assist with matters impacting your academic and personal circumstances
- Any other authorised third party to whom the University has a legal/contractual obligation to share personal data with

\*Please note that in emergency situations where the University deems it to be in your (or potentially a third party’s) ‘vital interests’ the University may share your personal data, including sensitive personal data with relevant individuals/agencies, e.g. the Police.

### **Third Party Processing**

The University may contract with carefully selected third-party service providers to process your personal data. The University will share limited and specific personal data with these service providers, who will be authorised to use personal data only as necessary to provide the contracted services to the University. Unless otherwise described in this Privacy Notice, the University does not share, sell, rent, or trade any data with third parties for their promotional purposes. We do not control these third-party processors and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit. The following is a list of third party processors and the purposes for which your personal data may be shared with and processed by them on behalf of the University.



- Student CRM (Data Harvesting): UCB use third-party data management providers for the purposes of storing personal data about you and your marketing preferences. Personal data may also be processed to support and improve the services that are offered.
- Email: UCB use third-party email providers for the purposes of sending emails relevant to your interests and application status. Personal data may also be processed for the purposes of personalising emails with your application details and other relevant information. Personal data may also be processed to track your behaviour relating to emails received, including whether you opened the email, and/or clicked any links. Service providers that may process personal data for the purposes of sending emails include: Student CRM, Dotmailer
- Events: UCB use third-party event management software for the purposes of managing bookings for events such as Open Days, Applicant Days and Campus Tours. Personal data will be processed and stored by these providers for making the booking, tracking attendance at events and sending event-based updates. Service providers that may process and store personal data for the purposes of event management include: Student CRM, Eventbrite.
- Digital Asset Management: UCB use third-party digital asset management software for the purposes of storing images and videos. With your permission, these images may be used by us for the purposes of marketing and advertising. The service provider that may process personal data for the purposes of image processing is Canto.
- Market Research: UCB use a third-party survey software provider for the purposes of conducting market research. Personal data may be processed by this provider for the purposes of analysing feedback. The survey software provider that may process personal data for the purposes of market research is Survey Planet.
- Online Advertising: UCB use several advertising platforms to inform you about courses, events, news and other information that may be of interest to you. These providers may process personal data to better target and personalise our advertisements to you or other potential students. Personal data may also be processed to inform the University about the performance of advertising campaigns. Service providers that may process personal data for the purposes of advertising include: Bing, Google, IDP Connect, LinkedIn, Meta, Snap Inc, TikTok, UCAS, The Student Room, UniCompare, Twitter. Online Messaging Platforms: UCB use third-party service providers to enable prospective students and applicants to chat online to existing students and staff of the University. Personal data may be processed by these providers for the purposes of enabling these conversations to take place on these platforms, enabling the University to monitor and track these conversations, and also keep you updated on the University. The service provider that may process personal data for the purposes of online messaging services is Unibuddy; Click4Assistance
- Postal: UCB use third-party service providers for the purposes of sending postal communications. Personal data may be processed by these providers to send postal communications such as prospectuses, letters, postcards and other materials to you on behalf of the University. Service providers that may process personal data for the purposes of sending postal communications include: Data Bubble, Mailchimp, InLine Marketing.
- SMS/Text Messages: UCB use third-party service providers for the purposes of sending SMS/text messages. Personal data may be processed by these providers for the purposes of sending SMS/text message invitations to events or updates on applications on behalf of the

University. Service providers that may process personal data for the purposes of SMS/text messages include: Click4Assistance, JanetText, Student CRM. PageOne

- Social Media/News Monitoring: MRA use third-party service providers for the purposes of sending, monitoring, and responding to social media messages. Personal data may be processed by these providers to collect, store and transmit messages to you that are posted either publicly on social media networks, or privately to the University by direct message. These providers may also monitor the wider internet, such as news websites, blogs and forums for mentions of University Customers for the purposes of news sourcing, alumni relations and reputation management. Service providers that may process personal data for the purposes of social media/news monitoring include: Orlo, Story Comms Cookies - Cookies are small pieces of information that a website can store on your computer in order for it to remember something about you at a later time. The information is in the form of a text file, which will only be understood by the web site that initially set the cookie. To find out more, see our [Cookie Policy](#).

The University may also share your sensitive personal data (e.g. health-related data) if it is necessary to do so in your or another person's vital interests **and** you are physically or legally incapable of giving consent. Relevant individuals and agencies may include your Nominated Contact and/or emergency contact, the ambulance service, NHS the police. In other circumstances, the University will share concerns about your health with your Nominated Contact with your consent.

If you sign up to Health Assured and they share information with UCB, your data will be stored securely and accessed only by relevant staff members.

### **Higher Education Statistics Agency Privacy Notice**

The Higher Education Statistics Agency (HESA) collects student information on behalf of the Office for Students and other Statutory Providers. .

Their Data Collection Notices can be found at: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

### **Education and Skills Funding Council Privacy Notice:**

<https://www.gov.uk/government/publications/esfa-privacy-notice>

### **Legal Basis**

The legal basis under which the University processes your personal data is as follows:

Consent – in certain cases, the University will only process certain data if you consent (see UK GDPR Article 6(1)(a) and Article 9(2)(a)).

Processing is necessary for the performance of a contract (see UK GDPR Article 6(1)(b)) or to take steps to enter into a contract.

Processing is necessary to comply with a legal obligation – the University may have legal obligations to provide your personal data to others e.g. HESA (see UK GDPR Article 6(1)(c)).

Processing is necessary 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 (see UK GDPR Article 6(1)(d)).

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller (See UK GDPR Article 6(1)(e)).

Processing is necessary for the purposes of the legitimate interest of the University or a third party except where such interests are overridden by your interests – 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 (see UK GDPR Article 6(1)(f)).

Processing of health-related data will only be done with your explicit consent (see UK GDPR Article 9(2)(a)).

Processing of data for the purposes of monitoring equal opportunities and checking criminal convictions is necessary for reasons of substantial public interest (see UK GDPR Article 9(2)(g) and Article 10).

<i>Version Number</i>	<i>Date Last revised</i>	<i>Revised By</i>
1.0	17/04/2018	DPO
1.1	02/07/2019	RC
1.2	28/04/2020	DPO
1.3	13/01/2021	DPO
1.4	15/02/2021	DPO
1.5	09/06/2021	DPO/RS/RG/AC/EP
1.6	05/11/2021	DPO
1.7	07/09/2022	DPO
1.8	24/01/2024	DPO/SHMA/AA