

Student Data Privacy Policy

How does UCA use Student Data?

The University for the Creative Arts (“the University”) has certain obligations under the Data Protection Act 1998 (“DPA”) to notify students as to how it will process any personal information it collects about them. The University is a data controller of your personal information under the DPA.

This notice will inform you of what personal information the University collects, how that information is used and shared, where it is transferred and how you may view and amend such information.

In addition to the functions described in this notice, the University may also maintain other policies from time to time, dealing with specific areas of your studies, such as the University’s Data Protection Policy and Procedures and the Student Regulations. These policies are available on the University’s Website and will be notified to you as necessary to comply with relevant data privacy laws.

What personal data is collected?

The University collects various “personal data” about you in the performance of student services and related functions which are explained in more detail below. Personal data is information which can identify you as a living individual, including where used in conjunction with other information. Common examples of personal data, which may be collected and used by the University in its day-to-day business activities, include:

- Personal details (name, address, date of birth)
- Phone numbers
- Photographs
- Financial information
- Academic marks
- Appraisals
- References
- Disciplinary information
- Criminal offence or conviction information
- Health and disability information
- Demographic data: ethnicity, religious belief, gender, sexual orientation
- Information regarding hobbies and interests
- Dietary requirements
- Work submitted through Turnitin plagiarism detection software
- Any other legitimate personal data relating to academic and pastoral support or which you volunteer to the University at any point.

Information about criminal allegations or offences, physical or mental health or disability, race/ethnicity, sexual orientation, political opinions and religious or similar beliefs is sensitive data (as defined within s.2 of the DPA) and is afforded an extra level of security and confidentiality. Emergency contact details provided by students will also be held in accordance with the DPA.

This information will be collected primarily from you as information voluntarily provided to us, but we may also collect it where lawful to do so from public sources, third party benefit or facility providers, other students, family members, government, tax or law enforcement agencies, reference and vetting service providers and other third parties. We may also collect personal information about and from your use of information systems, equipment and other assets and facilities made available to you for the performance of your studies.

How will my personal data be collected and used?

The lawful basis on which the University processes your data is that such processing is necessary for the performance of our contract with our students. The University primarily collects personal data about you to the extent necessary to establish, manage and support the student relationship with you and to perform any related functions, as well as to comply with applicable laws. Consequently, the University may process your personal data for the following reasons:

- Student welfare/pastoral care - for example, contact with tutors, Counselling Service;
- Administration and provision of health and well-being services;
- Financial administration - for example, payment of tuition fees, provision of loans and bursaries;
- Security and crime prevention/detection - for example, use of regulated CCTV, incident reports;
- Library services - for example, administration of membership, cards, loans and fines;
- Provision of student ID card;
- Provision and maintenance of computing facilities - including email accounts and internet access;
- Educational administration - for example, registration, progress monitoring, timetabling, calculation and publication of assessments, provision of references, implementation of any of our student regulations, e.g. Rules for Student Conduct, Academic Misconduct, Fitness to Study;
- Accommodation - provision and management of University owned and privately owned property for students;
- Administration of applications - receiving and processing UCAS forms, compilation of statistics, assessments of applications including preliminary and confirmed offers, some liaison with UCAS;
- Advisory services - for example, careers and financial advice plus any other purpose within the legitimate interest of the University;
- Administration of Alumni relations.

This list is not intended to be exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal data that the University maintains will be kept in paper files, while other personal data will be included in computerised files and electronic databases as set out in more detail below.

The University may also collect your personal data through IT and other communications systems used to assist with the performance and administration of student services and other related functions. These systems may be updated from time to time and interface with each other to share and update any personal data they hold.

Who will see my personal information?

Your personal data will be made available for the purposes mentioned above and only shared with responsible management, student support services, accounting, audit, compliance, information technology and other staff who properly need to know these details for their functions within the University.

Where there is a legitimate reason to do so, the University may disclose student personal data to the following third parties:

- Student Loans Company (to allow students to receive their loans);
- [Higher Education Statistics Agency \(HESA\)](#);
- The Police, Social Services or other agencies for the purposes of law enforcement or safeguarding;
- Local Authorities, for the purposes of electoral registration and Council Tax exemption;
- Home Office (information on immigration and visas);

- Next of kin and/or the emergency services in the event of an emergency, e.g. serious injury or illness
- The Students' Union;
- JISC Plagiarism Detection Service, Turnitin;
- External agencies assisting with the collection of destination data, in particular HESA's [Graduate Outcomes survey](#)
- The University's insurers in respect of claims made;
- Agents assisting the University with international admissions (agents);
- Companies performing administrative functions on behalf of the University – for example, debt recovery agencies;
- Internal and External auditors;
- Organisations seeking student views to enable the University to improve the experience offered to students for example, National Student Survey;
- The Government during information gathering exercises when the University is legally obliged to provide data;
- Potential employers and other educational institutions requesting a reference for a current or past student (consent is implied by providing the University's details as a referee); this includes confirmation of awards;
- Other educational institutions as part of a student exchange programme.

Such third parties may have access to your personal data only for the purpose(s) of performing their respective functions. The University shall remain the data controller of such student data. Any disclosures to third parties not listed here will be made only where legally required or lawfully permitted under the DPA. For example, in relation to courses that have a work experience programme, the University may share certain information about you with other companies that have expressed an interest in employing you or providing you with work experience.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to them unless consent is received from you or it is otherwise lawfully justified to make such a disclosure under the DPA and in accordance with the University's Data Protection Policy and Procedures. During enrolment we encourage you to give the University details of a named person, for example a parent or guardian to whom we have your permission to disclose relevant information about your studies at the University (attendance, fees, charges or debts, for example).

In addition, your personal data may also be made available to third parties providing relevant services under contract to the University for the purposes set out above. The University has appropriate security and data privacy measures in place with such third parties covering how they hold and maintain any personal data that the University provides to them. Personal data may also be released to external parties as required by legislation or by legal process, as well as to parties you authorise the University to release your personal data to. We will not sell your personal data to any third party other than as part of any restructuring of the University.

What safeguards are in place to protect my personal information?

Please note that all access to your personal information by the University, and third parties is controlled by the University's policies and procedures and any individuals who are provided with such access may only use your personal information for the purposes set out above (or as otherwise notified to you from time to time) taking steps to provide reasonable safeguards to protect your personal information at all times.

The University recognises that on occasion you may have reason to believe that a particular form of processing may cause you damage or distress, and will consider any request for processing activity to be modified. Any such request should be made in writing to your Campus Registrar in the first instance.

Your right to review and amend personal data

You have the right to review your personal data and have certain inaccurate information about you corrected. If you wish to do so, or to notify the University of a change in your details, please contact your Campus Registrar in the first instance.

Similarly, if you have a question about the use of your personal data, or wish to file a complaint about it, please contact your Campus Registrar.

Student responsibilities

Any personal data collected by you in the course of your University work must be held in accordance with the University Data Protection Policy and Procedures. You are expected to be familiar with this policy and responsible to the University for your actions when handling personal information on behalf of the University. Any serious breaches of this policy may be considered under the Rules for Student Conduct.

You also have a responsibility to ensure your personal details are up to date. This can be done online through your myRecords account.

Retention

Student files will normally be held for a minimum of six years after a student has left the University. Basic information (name, attendance dates and award) about students will be retained indefinitely after a student has graduated or left the University.

The Right to Erasure (the 'right to be forgotten')

With effect from May 2018 when General Data Protection Regulations come in to force, individuals will have the right to erasure, also known as 'the right to be forgotten', in some circumstances. This enables an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

When does the right to erasure apply?

The right to erasure does not provide an absolute right to be forgotten. Individuals have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- When the individual withdraws consent.
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
- The personal data has to be erased in order to comply with a legal obligation.
- The personal data is processed in relation to the offer of information society services to a child.

If you believe any of the above applies to your circumstances and you wish to exercise your Right to Erasure accordingly, please contact your Campus Registry in the first instance.

Alumni

On graduation, students will automatically become members of the University alumni and may receive information relating to alumni activities, such as news, events and fundraising opportunities. To opt out of receiving such information please email alumni@ucreative.ac.uk.