

# STUDENT PRIVACY NOTICE

## Purpose of this Notice

This Notice is for the attention of:

- People making enquiries about becoming a student at the University
- People applying to become a student at the University
- Students registered at the University

This Notice explains how we will collect and use your personal data.

We are the data controller for personal data that we process about you.

Where 'you' and 'your' are used in this Notice, those terms refer to those people listed above.

Throughout this Notice, "University" "we", "our" and "us" refers to the University of Huddersfield.

## Topics

This Notice contains the following information:

[Change in the law](#)

[Changes to this Notice](#)

[Where does the University get your personal data from?](#)

[Keeping your information up to date](#)

[Categories of personal data being processed](#)

[The purposes for which we process your personal data and the legal basis for that processing](#)

[Who might we share your data with?](#)

[Additional notices and guidance/policies](#)

[Automated individual decision making, including profiling](#)

[Unwanted communication](#)

[Transfers to other countries](#)

[How long do we keep your personal data for?](#)

[Your rights as a data subject](#)

[Legal basis for processing your data under GDPR](#)

[Concerns and contact details](#)

## Change in the law

From 25 May 2018, we shall process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (or GDPR for short). In this Notice 'DPA' refers to the relevant Data Protection Act.

This Notice complies with requirements under the DPA and GDPR.

## Changes to this Notice

We may make changes to this Notice. You should check this Notice regularly for changes. Students will be directed to this Notice on an annual basis as part of the enrolment and re-registration process.

You can obtain the current version of this Notice from <https://www.hud.ac.uk/media/assets/document/informationgovernance/dataprotection/PrivacyNotice-Students.pdf>.

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

We obtain personal data about you from the following sources:

- When you provide your contact details to request further information from us, such as a prospectus or if you book onto an Open Day or apply to study with us. The University uses a customer relationship manager (CRM) system to support this service. By providing us with this information, you will not have to repeat all the details of a previous enquiry; each time you contact us we will be picking up where you left off. This also means that we can improve the information that we provide to you about our courses and services in future.
- When you disclose personal data during the course of your studies with us, or when accessing University services or resources, including the Library, Wellbeing and Disability Services, the Careers Service, the Enterprise Team and Team Hud.
- From third party sources such as the Universities and Colleges Admissions Service (UCAS) or the Graduate Teacher Training Registry (GTTR); partner institutions delivering University courses; recruitment agents and overseas regional offices; sponsors (including employers and foreign embassies) government bodies (including the Student Loans Company, the Home Office, UK Visas and Immigration); work placement providers; external supervisors or examiners, academic referees. Where we obtain your personal data from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data.

## Keeping your information up to date

In order to help us maintain our records, students and applicants are asked to:

- provide accurate information in their applications and on enrolment
- inform the University promptly of any changes that would affect our records (e.g. name/address). Once you are enrolled with us you should keep your personal information up to date via My Details
- inform the University promptly in writing if you intend to withdraw from study, whether on a temporary or permanent basis
- for international applicants and students, inform the University promptly if your immigration status changes.

## Categories of personal data being processed

The University collects and processes data about you that relates to you being an enquirer, applicant or student at the University. A brief summary of the categories of personal data that we process is set out below. You can find further information about the purpose for which that personal data is processed [here](#) and how long we will keep that data for [here](#).

If you make an enquiry about studying at the University, whether directly to us or via a third party, such as UCAS or GTTR, we will collect and process basic information about you (name, contact details) in order to deal with your enquiry. You will be asked whether you wish to receive any further promotional information from us. If you choose not to receive further information, we will only use your details for the purpose of responding to your enquiry (unless you apply to study with us, or are a current student).

When you apply to study with you we will create and maintain your applicant record; this will contain your personal data, including your basic biographical details and records relating to your application to the University and the status of that application.

When you enrol to study with us, we will process a broad range of personal data to create and maintain your student record and deliver our services to you; this will include your basic biographical details, records relating to your application and admission to the University, arrangements for the payment and recovery of tuition fees, your course of study, supervision and assessment information, your attendance and disciplinary record, your immigration status, your use of the University's services and facilities and your academic results.

Personal data may contain "sensitive personal data" as described under the DPA and "special categories of data" as described under the GDPR. Such "sensitive personal data" or "special categories of data" could include information about your racial or ethnic origin, religious beliefs or other beliefs, physical or mental health or other conditions and information concerning any criminal offences or criminal proceedings. Details of when and why we process such information are included [here](#).

## The purposes for which we process your personal data and the legal basis for that processing

We collect and process a broad range of personal data about you in order to deliver our services to you as an enquirer, applicant or student; to manage our operations effectively and to meet certain legal requirements. In general terms, we process your personal data for:

- student recruitment, admissions, immigration, administration, teaching, supervision, placement support, lecture capture, attendance monitoring, assessment, graduation, careers support, health and safety, marketing and quality assurance and to provide other student support services while you are a student with us, including wellbeing and disability support
- statistical analysis for research purposes and to enable the University to identify additional support needs for students
- managing investigations under the Students' Handbook of Regulations (e.g. in connection with an academic integrity or disciplinary matter or for the investigation of a complaint)

We have set out [here](#) further details of the purposes for which we will process your personal data.

## Who might we share your data with?

The University protects the personal data that it holds about you and the standard response to enquiries about individuals is that information cannot be disclosed to third parties without your consent (unless we are required to do so by law or regulatory authority), including enquiries from parents or other family members.

However, there are occasions when we will share your personal data with third parties. For example, we may share some of your data with the Higher Education Statistics Agency (HESA) and other government or regulatory bodies, with third parties involved in the delivery and assessment of your course, with accrediting and professional bodies or your sponsoring employer or embassy, or to protect the health and safety of the University community.

Further information about who we may share information with and why is set out [here](#).

## Additional notices and guidance/policies

The University has further information about how we process your personal data and data protection compliance more generally:

- The University's [Data Protection Policy](#)
- Our website – we use Cookies on our web pages to help better understand how visitors interact with our website – please refer to our [Cookie Policy](#)
- Attendance monitoring – we conduct attendance monitoring for a number of reasons including to ensure the proper engagement of our students and to assist with student visa requirements. If you are a student, we require you to record your attendance in accordance with our Attendance Monitoring Policy, which can be found in the [Student Handbook of Regulations](#).
- Lecture capture service – we regularly record teaching sessions in which you may be involved. These recordings will be made in accordance with our [Audio and Video Capture Policy](#).
- Alumni – the University provides ongoing services to its alumni members following their graduation from the University, including careers and enterprise support. For more information, please visit our [alumni pages](#)
- HESA returns – we are required to return important information that will include your personal data to HESA. This forms your HESA record, which contains details of your ethnicity and disability information. Please see HESA's collection notice together with other supporting information at <https://www.hesa.ac.uk/about/regulation/data-protection/notices>
- Education and Skills Funding Agency (ESFA) returns if you are an apprentice studying a degree apprenticeship with us. Please see ESFA's collection notice and other supporting information [here](#)

## Automated individual decision making, including profiling

This is where we may make decisions automatically about you without human intervention.

We use your personal data to conduct automated individual decision making and profiling as described in more detail [here](#), where you can also go to find out further information on the logic behind our decisions as well as the significance and consequences of our decisions. If you are still finding it difficult to locate or understand this information, please contact the Data Protection Officer who will help you further.

## Unwanted communication

We will from time to time communicate with you by email, post and telephone. These will generally be required in order that we can deliver our services to you as summarised in this Notice. If, at any stage, you are concerned about the content of these communications, e.g. unwanted marketing information, please unsubscribe to general email communications, where available.

If you are unsuccessful in unsubscribing from our communications and/or remain concerned, please contact our Data Protection Officer.

## Transfers to other countries

Sometimes to achieve the purposes for which we are processing your personal data we may need to share your personal data with other organisations based within the European Union. If we need to share your personal data with organisations outside the European Union we will seek to ensure that such organisations are based in countries that have comparable levels of personal data protection regulations to those enjoyed in the European Union.

When it is necessary to share your data with organisations outside of the European Union, we will ensure that there are appropriate safeguards in place.

## How long do we keep your personal data for?

[Table 2](#) of this Notice describes the University's published guidelines for retention of student data.

## Your rights as a data subject

We thought it would be helpful to set out your rights under 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, in certain circumstances;
- restrict processing in certain ways;
- obtain a copy of your data in a commonly used electronic form; and
- object to certain processing of your personal data by us.

Further information about these rights is available from the [Information Commissioner's Office](#). You may also contact the Data Protection Officer for further information.

You have a right to complain to the Information Commissioner's Office about the way in which we process your personal data. Please see <https://ico.org.uk/>.

## Legal basis for processing your data under GDPR

GDPR is new law and the extent of lawful grounds for processing personal data has yet to be fully understood. The information set out [here](#) represents the University's current informed view on the grounds for processing against each specified purpose. As understanding and application of GDPR develops, the University may change its views on its legal basis for processing; we will notify you where this is the case.

The grounds for processing under the GDPR are explained briefly below for your information:

- **Consent** (Article 6(1)(a)): on specific occasions the University will only process certain data if you consent.
- **Necessary for the performance of a contract** (Article 6 (1)(b)): on many occasions the University will process your data to enable it to meet its contractual commitments to you.

- **Necessary to comply with a legal obligation** (Article 6 (1)(c)): the University may have legal obligations to provide your personal data to others, for example ESFA returns, or to comply with visa requirements.
- **For the purpose of protecting the vital interest of yourself or another** (Article 6 (1)(d)): sometimes in extreme circumstances the University will have to release information to protect your interests or the interests of others, for example in medical emergencies.
- **Necessary for the performance of a task carried out in the public interest** (Article 6 (1)(e)): 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).
- **Necessary for the purposes of the legitimate interest of the University or a third party subject to overridden interests of the data subject** (Article 6 (1)(f)): the “legitimate interest” is generally the interest of the University (or third party) in providing or supporting the provision of higher education to its students.
- **Automated decision making necessary for performance of a contract** (Article 22(2)(a)): the University will sometimes automate decisions relating to its services it is providing to you.
- Processing ‘special categories’ of personal data (Article 9(1)(a)): where you have given consent, where necessary for reasons of substantial public interest or in connection with legal claims.

The University also reserves the right to rely upon other grounds that are not referred to [here](#).

## Concerns and contact details

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to this Notice, please contact our Data Protection Officer, ([data.protection@hud.ac.uk](mailto:data.protection@hud.ac.uk))

Our general postal address is The University of Huddersfield, Queensgate, Huddersfield, HD1 3DH, UK.

Our telephone number is 01484 473000.

Our data controller registration number provided by the Information Commissioner's Office is Z6534300.

## Purpose and Legal Basis of processing student personal data

No.	Specific Purposes	Legal Basis
1.	Managing enquiries from prospective students about studying with us and communication of information about the University, our courses of study, application processes (e.g. UCAS) and opportunities to find out more about us, including Open Days	Legitimate purpose of providing information in response to a request. If you make an enquiry and don't wish to receive further communications from us you will be given an opportunity to unsubscribe from further communications at the point at which the enquiry is made and further communications.
2.	Correspondence with applicants regarding their application, to provide information about Applicant Visitor Days and the next steps in the application process	Necessary for entering into a contract to study at the University
3.	Processing applications to study and enrolment, which may include the processing of criminal record information where a DBS and/or health check is a requirement for admission to a course	Necessary for the performance of a task carried out in the public interest: the provision of higher education
4.	Correspondence with offer holders regarding the next steps in the application and enrolment process and support	Necessary for entering into a contract to study at the University
5.	Administration of enrolment and induction events and transfers to new courses	Necessary for entering into a contract to study at the University
6.	Academic assessment, including formative and summative assessment, examinations and progression	Necessary for the performance of a task carried out in the public interest: the provision of higher education and for the performance of the student contract
7.	For administering work based placements, including monitoring and assessing performance	Necessary for the performance of the student contract
8.	To produce student ID cards and the inclusion of photographic images on the University's computerised student record system	Legitimate purpose of registering students and enabling attendance monitoring and the safety and wellbeing of the University community
9.	Monitoring of student attendance, submission of assessments and engagement with educational services including the library and the student VLE, including statistical analysis for the purpose of providing student support.	Legitimate purpose of seeking to ensure that students achieve academic success through full engagement with their studies and to help the University to make informed decisions which can lead to improved student satisfaction, retention and attainment,

		such as offering additional support where appropriate. Monitoring of attendance of international students with Tier 4 visas is necessary for the University to comply with its legal obligations to the Home Office as a Tier 4 licence holder
10.	To administer graduation services and grant awards	Necessary for the performance of a task carried out in the public interest: the provision of higher education
11.	The publication of each graduand's name and final award (but not their classification) in the graduation programme. Your details may also be included in commemorative items or memorabilia and may be notified to the local press.	The graduation programme is an official publication of the University and published for the legitimate purpose of the University recording the awards of its students. Your prior consent will be sought for inclusion of your details in commemorative items or memorabilia or notified to the press.
12.	For the purpose of filming and photographing graduation ceremonies for live online streaming/publication and for creating a filmed record of the ceremony for graduates and their friends and families to retain as a memory of the event.	Legitimate purpose of providing a filmed record of the graduation ceremony. Attendees at the ceremony will be informed in advance that filming/photography will be taken place and will be given the opportunity to move out of shot.
13.	Consideration and granting of financial awards such as prizes, scholarships and bursaries, of discretionary funding available to students (e.g. student hardship fund) and other such awards	Legitimate purpose of providing wider support to students and encouraging engagement in higher education
14.	To offer facilities and services central to your studies, including library access, computing access and access to the student VLE	Necessary for the performance of the student contract
15.	To offer and provide student support services, wellbeing and disability support, counselling services, careers advice and enterprise support	Legitimate purpose of providing student support services where requested by a student or alumnus of the University
16.	The operation of lecture capture services relating to the recording of timetabled teaching sessions by the University to assist student learning in accordance with our <a href="#">Audio and Video Capture Policy</a> .	Legitimate purpose of providing online access to lecture content to deliver additional learning support for our students
17.	For the purpose of processing safeguarding concerns to ensure the safety and wellbeing of members of the University community	Legitimate purpose of ensuring the safety and wellbeing of the University community and, where relevant, necessary to comply with a legal obligation
18.	Monitoring of use of IT services in accordance with the Computing Regulations and Acceptable Use Policy	Legitimate purpose of ensuring network security
19.	Membership of Team Hud sport and exercise facilities. Members are required to accept the Team Hud terms and conditions	Necessary for the performance of the Team Hud contract
20.	To collect, process and administer tuition and bench fees and to recover unpaid fees, which might include referring debts to a third party debt collection agency	Necessary for the performance of the student contract and for the legitimate purpose of ensuring the University's financial strength by the collection of debts owing to it



21.	To administer applications for employment and employment contracts where students are employed by the University or through schemes such as the 'Job Shop' administered by the Careers Service	Necessary for entering into an employment contract with students and/or for legitimate purposes to support students seeking employment during their studies
22.	Research and statistical analysis for internal management purposes to improve the educational services of the University	Where such analysis does not use anonymised data, the use of the personal data is necessary for the performance of a task carried out in the public interest: the provision of higher education. Where such analysis includes special category data, this data is processed for reasons of substantial public interest and for statistical and research purposes
23.	Administration of external and internal student surveys, including collection of feedback on specific services such as the Library, Computing Services and the Careers Service	Consent from students who complete the surveys
24.	<b>Automated</b> individual decision making, which is only carried out for the purpose of making offers to applicants who meet the entrance criteria for certain courses	Article 22(2)(a)
25.	Administration of complaints, investigations and disciplinary proceedings concerning student misconduct, including investigations relating to academic integrity and fitness to practice in accordance with the Student Handbook of Regulations	Necessary for the performance of a task in the public interest, namely higher education provision (to maintain the integrity of the University's assessment process, our academic standards, our reputation and the welfare of our students and the wider University community)
26.	Administration of academic appeals and requests for extensions and for extenuating circumstances to be taken into account	Necessary for the performance of a task in the public interest, namely higher education provision
27.	To provide immigration welfare support services for international students including applications for visa extensions	Legitimate purpose of supporting international students
28.	To monitor our compliance with equalities legislation	Legitimate purpose of seeking to widen access to higher education, encourage diversity amongst the student body and provide appropriate support in accordance with our legal obligations under the Equality Act 2010
29.	Research and statistical analysis for the purpose of producing statistical returns required for third party government bodies, e.g. the Higher Education Statistics Agency, for completion of government supported surveys, e.g. the National Student Survey, the Destination of Leavers in Higher Education Survey, the Graduate Outcomes Survey and the Teaching Excellence Framework	Necessary for the performance of a task in the public interest; (statutory functions or responsibilities of government departments and public bodies) and for reasons of substantial public interest and for statistical and research purposes in the cases of disclosures of sensitive personal data
30.	Direct mailing about student benefits and opportunities offered by or through the University and University events and activities and events organised for students or the wider University community	Legitimate purpose of providing a wider student experience

31.	Host mailing of services or career opportunities of direct relevance to student interests	Legitimate purpose of providing relevant information to students
32.	Administration of alumni membership	Necessary for the performance of a task carried out in the public interest: the provision of higher education
33.	For the purpose of maintaining contact with you after you graduate to enable us to provide careers advice and to be able to facilitate HESA's Graduate Outcomes Survey	Legitimate purpose of providing a careers service to our graduates and necessary for statistical purposes (HESA's statistical analysis of graduate employment outcomes).
34.	For the safety and security of the University community and their property and the protection of University assets, including the use of CCTV – in accordance with the University's <a href="#">CCTV policy</a>	Legitimate purpose of providing a safe University environment, facilitate prevention and detection of crime and assist with investigation into potential breaches of University regulations and policies
35.	For the purpose of capturing images of the University and campus life for use on the University website and in brochures, prospectuses and other internal and external publicity materials, which may capture images of students and visitors to the campus	Legitimate purpose of creating publicity materials. You will be informed in advance that filming/photography will be taken place and will be given the opportunity to move out of shot.
36.	For the purposes of assisting with public health tracing services for communicable diseases	Necessary to fulfil a legal obligation, to comply with Health & Safety legislation and, in particular the Public Health (Control of Disease) Act 1984 (as amended). Necessary for the performance of a task carrier out in the public interest Legitimate purpose of keeping the University community safe and healthy

### Personal data shared with third parties for the following purposes

1.	To UCAS to administer the application and clearing process	Necessary for the performance of a task in the public interest; the provision of higher education.
2.	To Huddersfield Students' Union (SU). At enrolment you will be given the opportunity to become a member of the SU, unless you indicate that you wish to opt out of membership. The University will share with the SU each member's name, student number, course, contact information and other relevant information to enable the SU to provide members with information about its services, clubs, societies and events, which it may do by email or by post. The University will also share limited information about non-members to enable the	Legitimate purpose of enabling the SU to provide students who are SU members with access to SU services.

	SU to administer academic subject societies in collaboration with the University. Students may opt out of SU membership at any time via My Details.	
3.	As part of the pre-enrolment process you will be asked if you would like to complete a voluntary survey carried out by the SU, which if you choose to complete it will collect your personal information to help improve the ways in which the SU communicates with enrolled students.	Consent – the survey is entirely voluntary
4.	If you are chosen to be the course rep for your course, then your basic contact details (name, student number and email address) will be shared with the SU to enable the SU to provide training and support for your role as course rep	Legitimate purpose of enabling effective student representation on University course committees
5.	To HESA, the Higher Education Funding Council, the Office for Students and Government Departments such as the Department for Education, for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable (this disclosure may include sensitive personal data about ethnicity, sexual orientation, gender reassignment and religion)For more information on the information shared with HESA please refer to HESA’s data protection <a href="#">collection notice</a> for students.	Necessary for the performance of a task in the public interest; (statutory functions or responsibilities of government departments and public bodies) and for reasons of substantial public interest and for statistical and research purposes in the cases of disclosures of sensitive personal data
6.	To the organisation (currently Ipsos Mori) that has been contracted to carry out the National Student Survey on behalf of HEFCE as part of its statutory function. Student feedback from the survey is used to compile year on year comparative data, with anonymised results being publicly available to prospective students and advisors to help make informed choices of when and where to study. The survey outcomes also help to inform the Teaching Excellence Framework as well as enabling the University to facilitate best practice and enhance the student learning experience. Details of how Ipsos Mori will use your details in connection with the NSS, including how they might contact you, are available <a href="#">here</a> .	Necessary for the performance of a task in the public interest; (statutory functions or responsibilities of government departments and public bodies).
7.	To close family or next of kin and emergency services where there is an emergency situation such as illness or serious injury.	Processing necessary to protect the vital interests of our students or for the legitimate purpose of ensuring the safety and wellbeing of our students.
8.	To the Student Loans Company and Student Finance England to administer student fees and to confirm enrolment and payment. We will also disclose	Necessary for the performance of a task in the public interest: the proper administration of student funding support

	personal data to the Student Loans Company where they are investigating student funding fraud.	
9.	To HESA to enable them to contact you to undertake the Graduate Outcomes Survey, pursuant to which you will be contacted within 18 months after you graduate to ask about your current status (e.g. employment, further study other activity) and plans for the future. The first Graduate Outcomes Survey will commence from December 2018 and further information will become available nearer to that date	Necessary for statistical purposes (HESA's statistical analysis of graduate employment outcomes).
10.	To local authorities for Council Tax assessment or electoral purposes and for processing of care leaver bursaries	Necessary for the performance of a task in the public interest, namely local authorities' functions
11.	To IT providers delivering externally hosted IT services or products to the University, including Microsoft 365, Panopto (lecture capture), D2L (Brightspace VLE and related app), UniApp, Skillsforge (postgraduate researcher administration), Pebblepad (student placement portfolio services), iParadigms (Turnitin and Grademark) and to third party contractors responsible for the maintenance and support of the University's IT systems, subject to strict conditions	Legitimate purpose of providing students with IT solutions and services to support their studies
12.	To Northumbria University (on behalf of the NorMAN Consortium) for the provision of round the clock IT support	Legitimate purpose of providing students with IT solutions and services to support their studies
13.	To external agencies offering plagiarism checking services such as Turnitin and other academic institutions to identify academic integrity misconduct. All assessments submitted through Turnitin will be included as source documents in the iParadigms reference database solely for the purpose detecting plagiarism of such papers.	Necessary for the performance of a task in the public interest, namely provision of higher education services (necessary to maintain academic quality standards and integrity).
14.	To Qualification Check Limited (Qualcheck) which allows third parties (such as employers or statutory bodies) to verify basic degree and enrolment information about you with your consent.	Legitimate purpose of providing an effective solution to award verification requirements of our graduates and their employers
15.	To organisations providing banking and online payment processing services	Legitimate purpose of engaging third parties to process and manage the University's financial transactions
16.	Disclosure of apprentices' attendance, conduct and academic progress information to employers with which the University works to deliver our apprenticeship programmes	Necessary for the performance of the apprenticeship contract and to comply with the ESFA funding rules
17.	Disclosure of apprentice information to the Education Skills Funding Agency. More information about the data shared and the purpose of sharing is published in the <a href="#">ESFA Privacy Notice</a>	Necessary for the performance of tasks in the public interest and for the performance of a legal obligation.

18.	To other UK based and international educational institutions which the University collaborates to deliver placements, student exchanges and franchised or validated awards or with which we conduct research work	Processing necessary for the performance of the student contract and for scientific research or statistical purposes or legitimate purpose of providing students with exchange or placement opportunities
19.	To work placement providers in connection with the administration, monitoring and assessment of your placement	Processing necessary for the performance of the student contract or legitimate purpose of providing students with placement opportunities
20.	To validating and professional bodies in connection with registration, accreditation and awards	Necessary for the performance of a task in the public interest: the provision of higher education
21.	To third parties contracted by the University for administrative, teaching, assessment, or quality assurance purposes and for assisting the University with data analytics for student support purposes	Necessary for the performance of the student contract or for the legitimate purpose of delivering services to students
22.	To grant funding bodies to evidence allocation of grant funding payments, including payment and contact details of students undertaking grant funded work	Legitimate purpose of administering grant funds in accordance with funder requirements
23.	To debt collection agencies for the recovery of outstanding tuition fee or other debts owing from students to the University where internal attempts to recover the debt have proved unsuccessful	Legitimate purposes of recovering debts
24.	To the University's insurers, auditors and legal advisers and external auditors and regulators such as the Health and Safety Executive or the Information Commissioner's Office	Legitimate purposes of receiving professional services and for managing insurance claims, accidents, incidents and data incidents. Disclosures of sensitive personal data in this context will be made where explicit consent has been obtained, disclosure is in the substantial public interest or where necessary for establishment, exercise or defence of legal claims.
25.	To the British Council for the administration of pre-arrival events	Legitimate purpose of supporting international students in preparing for their arrival in the UK
26.	To recruitment agents for the purpose of facilitating applications and enrolments and to administer commission payments	Legitimate purpose of facilitating applications and enrolments of international students with the University
27.	To a sponsor or other third party funder (including your employer) of your studies where this is a condition of your sponsorship and to enable student debt to be paid. Data will include information on your progression, attainment, attendance, conduct and any academic integrity concerns	Legitimate purpose of facilitating student funding
28.	To the Home Office, UK Visas and Immigration and other international and national governmental and regulatory bodies in connection with the assessment	Necessary for compliance with legal obligations or for the performance of public tasks in the immigration context.

	of students' immigration status and administration of the University's Tier 4 licence	
29.	To DIGs, the University's preferred, recommended and approved student accommodation provider. The only information that is shared is to confirm when an applicant holding a conditional offer who has reserved a place in DIGs accommodation has satisfied the conditions of their offer and is holding a confirmed place to study at the University, or to refer applicants applying through Clearing to DIGs to assist with accommodation provision	Legitimate purpose of facilitating the arrangements for student accommodation to ensure that places are retained for students who are due to commence their studies with the University
30.	To current or prospective employers or educational establishments in confidential references in connection with applications for employment or further education	Legitimate purpose of responding to a valid reference request
31.	To external agencies for the assessment and provision of services to disabled students	Consent
32.	To external examiners, supervisors or assessors for the purpose of research supervision or student assessment	Necessary for the performance of a task in the public interest: the provision of higher education
33.	To professional and industrial bodies (such as the Law Society) wishing to communicate with students about career opportunities and membership of their organisation	Consent, or where membership of a professional body is a necessary condition of study, necessary for performance of the student contract
34.	To other higher education institutions or government agencies for the verification of your personal data held by the University	Legitimate purpose of ensuring the University's records are correct and for quality assurance purposes
35.	To your previous school or college (information relating to your final award) with your consent	Consent
36.	To the University's text-messaging alerts service provider (basic information to enable SMS alerts to be sent to your mobile phone concerning your application, confirmation of your place and to assist with the enrolment process.	Legitimate purpose of maintaining effective communication with applicants prior to their enrolment at the University
37.	To the University's text-messaging alerts service provider (basic information to enable SMS alerts to be sent to your mobile phone concerning your course and other relevant purposes), with your consent, which is given at enrolment.	Consent
38.	To third parties wishing to access library resources containing references to a student's work	Legitimate purpose of providing open access to research and academic works where students have consented to the publication of their work or are required to publish under the terms of a relevant funding or sponsorship agreement
39.	To GBG Solutions for the purpose of carrying out DBS checks for students on professional courses where a DBS check is a condition of enrolment and for	Necessary for the performance of a task in the public interest: the safeguarding of regulated activity

	those students who may undertake a placement at an organisation that requires a DBS check to be carried out	
40.	To direct mail and marketing and events agencies who may assist the University in the administration of mailings to enquirers, applicants, offer holders, students and our alumni and for the booking of events. Examples of such agencies include RH Partners and EventBrite	Processing is necessary for the legitimate purpose of communicating with enquirers, applicants, offer holders, students and others about the relevant benefits, services, activities and events offered by the University in connection with that individual's own interest in the University.
41.	Subject to certain conditions, to the police or other law enforcement or regulatory bodies (including the Benefits Agency, Local Authorities in relation to Council Tax matters and the UKVI in relation to visa and immigration matters) where necessary for the investigation or disclosure of a potential crime, the proper collection of taxation, or in relation to national security matters	Processing necessary for the performance of a task in the public interest: the prevention or detection of crime or compliance with statutory powers
42.	The Department for Health & Social Care (DHSC) and Local Authorities for the purposes of assisting with contact tracing in the event of an individual with a notifiable disease being identified within the community (limited to the contact details of those with whom the affected individual has had contact with, and details of that contact).	Necessary to fulfil a legal obligation, to comply with Health & Safety legislation and, in particular the Public Health (Control of Disease) Act 1984 (as amended). Necessary for the performance of a task carried out in the public interest Legitimate purpose of keeping the University community safe and healthy

TABLE 2 – RETENTION PERIODS

CATEGORY	RECORDS	RETENTION PERIOD	RATIONALE
<b>Student Recruitment</b>	Enquiries from prospective students	Last contact + 6 years	UoH 1980 c. 58
<b>Student Applications</b>	Individual applications for admission which were unsuccessful  Individual applications for admission which were successful	Completion of admissions process + 1 year  End of student relationship + 6 years	SI 2006/1031 Regulations 23, 39 and 42 SI 2003/1660 Regulations 20, 31 and 34 SI 2003/1661 Regulations 20, 31 and 34  1980 c. 58 s 5
<b>Student Immigration Records</b>	Immigration documents (copies of passport, UK biometric data card)	End of student relationship + 6 years	1980 c. 58 s 5 Guidance from UK Border Agency on Immigration Rules made under 1971 c.77 (HC 413 2008/9)
<b>Core Student Records and Administrative Records</b>	Core student record to include personal details, records allowing transcript to be provided, such as courses followed and grades, final degree and academic distinctions  Other administrative data including registration/enrolment onto programmes; academic progress; placements; actions taken to deal with unsatisfactory progress; transfer to new programmes/course withdrawal/suspension  Administration of programmes: including compiling class and tutorial lists; class attendance lists; organising required work	Permanent retention  End of student relationship + 6 years  Current academic year + 3 years	Enduring value  1980 c. 58 s 5  JISC recommendation



	placements; issuing attendance certificates for postgraduate research students.		
<b>Student Assessments</b>	<p>Work submitted for assessment (including examination scripts)</p> <p>Postgraduate theses</p> <p>Attendance/submission of work, including extenuating circumstances.</p> <p>Requests for transcripts and references</p>	<p>Confirmation of marks/grades by Course Assessment Board + 4 months</p> <p>Permanent retention</p> <p>Current academic year + 6 years</p> <p>Last action on request + 1 year</p>	<p>UoH Regulations</p> <p>UoH Regulations</p> <p>1980 c. 58 s 5</p> <p>JISC recommendation</p>
<b>Student Support</b>	<p>Feedback, guidance and support given by tutors to individual students</p> <p>Use of support services by individual students (including disability support, careers advice and Library borrower record)</p> <p>Use of Counselling service by individual student, including case notes/process notes</p>	<p>Completion of student's programme + 6 years</p> <p>Completion of student's programme + 6 years</p> <p>Completion of student's programme + 6 years</p>	<p>1980 c. 58 s 5</p> <p>1980 c. 58 s 5</p> <p>1998 c. 29, BACP Recommendation</p>
<b>Appeals and Complaints</b>	Appeals & complaints including formal disciplinary proceedings against a student	Last action on case + 6 years	1980 c. 58 s 5
<b>Student Financial Records</b>	Provision of financial aid/bursaries/hardship funds/scholarships to individual students	Current financial/academic year + 6 years	1980 c. 58 s 5
<b>Protection of Vulnerable Groups</b>	<p>DBS clearance Certificates</p> <p>DBS checks documentation, including DBS panel minutes</p>	<p>Date of clearance + up to a maximum of 6 months</p> <p>End of Student Relationship + 6 years</p>	<p>DBS code of practice</p> <p>UoH</p> <p>1980 c. 58 s 5</p>

	<p>Concerns about vulnerable groups that University refers on to children's social care, Social Services or the Police</p> <p>Concerns about students who work with vulnerable groups</p>	<p>Last contact + 6 years, unless a legal case has been brought within that time</p> <p>After student leaves the University + 6 years, unless a legal case has been brought</p>	<p>1980 c. 58 s 5</p>
<b>Health and Safety</b>	<p>Non-COSHH (Control of Substances Hazardous to Health) records</p> <p>COSHH (Control of Substances Hazardous to Health) records (includes vaccination and blood test results)</p>	<p>End of Student Relationship + 6 years</p> <p>Date of last entry + 40 years</p>	<p>UoH BMA 2017 Updated Guidelines</p> <p>SI 2002/2677 regulations 10 and</p>