Student Data Collection Notice 2023/24

1 Introduction

The University needs to collect and process personal data in order to meet statutory requirements, function effectively as an educational institution and provide students with the support they require while undertaking their studies.

This notice explains how the University collects, uses and shares personal data relating to current and former students ('you'/'your') and your rights in relation to the processing of your personal data.

This notice should be read in conjunction with the University's <u>Data Protection Policy</u> and <u>Privacy Notice</u>.

2 The law

The information we collect is 'personal data' and there are laws which cover howwe collect, hold, store and disclose your personal data.

This Data Collection Notice has been developed to be compliant with the obligations set out in current and changing UK data protection laws. The University will ensure that all types of personal data held about you is managed and processed in accordance with prevailing data protection law.

3 Personal Data

Your personal data is collected when you apply to study, register as a student, through using various University services while you undertake study, when registering for events or volunteering opportunities. It is also collected via a number of third-party organisations such as UCAS, the Student Loans Company and other academic institutions.

Information we collect and process which is *personal data* includes (but is not limited to):

- your unique University student number and other examples of unique system IDs (e.g. UCAS personal ID);
- contact information (including name, term-time and home addresses, telephone number(s) and email addresses);
- · gender and date of birth;
- nationality;
- emergency contact details;

- details of relevant criminal convictions;
- digital passport style photograph of you to produce Unicard;
- identification documents (e.g. passport, driving licence, birth certificate);
- information provided as part of your application to study at the University, or created during the application process (e.g. interview scores and notes, highest qualification on entry, previous education and employment history);
- financial information (e.g. bank details for payments of scholarships and bursaries);
- fee invoice and payment records (e.g. how your studies are being funded, including sponsorship details;
- attendance and engagement information;
- examination and assessment results;
- visa and immigration information (including visa and passport details);
- information provided in relation to personal circumstances, appeals and complaints;
- · references;
- information relating to any disciplinary, academic malpractice or other University procedures;
- · caring responsibilities;
- details of any professional body registration;
- information relating to the provision of IT services such as IP addresses, usernames, email addresses and other network data;
- other legitimate personal data relating to academic and pastoral support.

4 Sensitive Personal Data

We may also collect, or you may choose to provide us with, the following special categories of more sensitive personal data:

- race or ethnicity, religious beliefs, sex life or sexual orientation and political opinions;
- health, including any disability or medical condition, and dietary requirements;
- criminal convictions or offences.

We use the information we collect to ensure we provide appropriate support to students. In addition, should the data you provide indicate you have one or more widening participation characteristics, the University may contact you regarding targeted offers of optional support and opportunities and the evaluation of these. Contact may be made by teams and individuals who contribute to the delivery of the University's Access and Participation Plan. These communications are to ensure that all students, including those from backgrounds that are traditionally underrepresented in Higher Education, are aware of and engaged in the breadth of support and opportunities available to them. This forms part of the University's wider work towards tackling inequality within Higher Education.

Widening Participation characteristics include being: care experienced, a care leaver,

a person estranged from their family, mature (aged 21+ on entry to an undergraduate degree), from a Black, Asian or Minority Ethnic group, a carer, a child of a military family, LGBTQI+ students, disabled students, a refugee, first in family to study in Higher Education, students with certain entry qualifications, students from an area of lower higher education participation, lower household income and/or lower socioeconomic status groups.

These types of personal data require us to take additional steps to ensure their security and confidentiality. Information about how we do this is provided in our Privacy Notice.

5 Enrolment – important legal information

By completing enrolment you are entering into a legally-binding contract with the University and are agreeing:

- to accept the <u>Terms and Conditions</u> of your offer;
- to your details being entered into and stored securely on the University Student Records Database;
- to confirm acceptance that you will be liable for any tuition fees;
- to comply with all University Regulations, Rules, Codes, Conditions, Policies and Procedures:
- to share your name, course of study, contact details and any other legitimate relevant information with the agencies referred to, but not restricted to, those identified in this Data Collection Notice;
- that you understand the purposes for which the information you provide is being used; and
- that to the best of your knowledge the information is correct.

You will be required to upload a passport style digital photograph of yourself during enrolment, which will be stored on your student record and printed on your Unicard for identification purposes. This photograph may also be used on class lists and examination registers. In addition, it may be shared with placement providers and the police in certain circumstances.

We will ask you to provide information which we use for equal opportunities monitoring. You **do not have to comply** with this request but if you do you are agreeing to the University returning the data to the Higher Education Statistics Agency (HESA) as part of a statutory statistical return.

6 Using your data within the University

We will process your personal data, including sensitive personal data, for a range of purposes including:

- the creation and maintenance of a student record;
- general administration relating to teaching, assessment, student recruitment, health and safety, marketing or for ensuring the quality of what we do;
- to ensure you are aware of the support services available to you including Student Services and Careers support;
- the collection and analysis of statistics which help us to know what we are doing well and where we need to improve or provide additional support for students;
- investigation of matters relating to our rules and regulations for example cheating in assessments, student discipline or complaints;
- compliance with legal and regulatory responsibilities (e.g. UKVI).

Edge Hill University relies on several different legal bases. Depending on the processing being performed these may include one or more of the following:

- Consent processing will sometimes be carried out in accordance with your consent;
- Performance of the student contract processing is required to fulfil the University's contractual obligations to deliver you educational services;
- Vital interest to protect the vital interests of yourself or another, particularly in the case of medical emergencies;
- Legal obligation providing data to statutory and regulatory agencies;
- Public interest to enable teaching and research, which delivers a public and societal benefit;
- Legitimate interests a vibrant and engaged alumni community supports and enhances the teaching and research of the University, having taken account of the privacy rights and freedoms of alumni.

6.1 Students with disabilities

If you provide information concerning a disability, we will share this with appropriate University employees to ensure that reasonable adjustments can be made, and relevant support can be offered. Sharing of personal data in such circumstances will be kept to a minimum. If you would not like us to share this information, or would like to limit the amount of information we share, please notify the Inclusion Team or the SpLD Team as detailed below. Please be aware however, that limiting the sharing of information may limit the University's ability to make the reasonable adjustments it considers necessary to effectively support you.

Inclusion Team
Catalyst

Email: inclusionteam@edgehill.ac.uk

Tel: 01695 657568

SpLD Support Team

Catalyst

Email: spld@edgehill.ac.uk

Tel: 01695 657526

6.2 Providing Student Support

If you disclose information about challenges you are facing in your studies or your wider student life, we may share this with appropriate staff or services internally to ensure that you can be offered support. This may relate to a number of areas including (but not limited to) health, academic struggles, wellbeing and/or money issues. If you wish us to not share this information, this should be made clear at the point of disclosure. Please be aware however, that limiting the sharing of information may limit the support we are able to provide.

6.3 University Publications

If you do not want your name to be included in University publications e.g. in Graduation ceremony brochures or on Alumni lists, you can ask for your name to be excluded. You should make a request in writing to datasupport@edgehill.ac.uk.

7 Sharing data outside the University

The University is required to collect and process certain information about you to external and partner agencies. It may occasionally be necessary for the University to share your personal data with third parties, such as potential employers or educational providers whom you have approached, to verify details of your qualifications.

7.1 Data sharing in an urgent situation or in an emergency

In an emergency the University will share data as is necessary and proportionate. An example of an emergency situation is the risk of serious harm to human life.

In these situations, it might be more harmful not to share data than to share it, and the University would consider the risks involved in both sharing and not sharing data on a case-by-case basis. This may include sharing information with the Trusted Contact you have provided to the University.

This would be carried out in accordance with the guidance issued by the Information Commissioner's Officer (ICO).

7.2 Concerns for mental health and/or safety

Families, carers and Trusted Contacts can play an essential part in supporting a student about whom there may be mental health concerns. If staff at the University are concerned about your mental health and/or safety, they will make every reasonable effort to secure your consent before involving a third party. When accessing services, you will be given an opportunity to update your Trusted Contacts and express your wishes about sharing information.

Staff working in University support services are often required to balance the need to create a confidential and trusted space for students to discuss their problems, with the need to act in situations where a student may be at risk of harm. In some

circumstances, this could include sharing information within the University, with emergency services or with a students' contacts without their consent (as per section 7.1).

7.3 Government Agencies

Records made up of mainly coded information, or parts of it, will be passed to Government Agencies as part of a statistical return needed to enable them to carry out their legal obligations in relation to the funding and/or quality assurance of education. The Government Agencies include (but are not limited to)¹:

- Department for Education;
- Department for Business, Energy and Industrial Strategy;
- Welsh Government;
- Scottish Government;
- Northern Ireland Government:
- Department for the Economy;
- Island Governments:
- Office for Students (OfS) and their designated bodies;
- Higher Education Funding Council for Wales;
- · Scottish Further and Higher Education Funding Council;
- UK Research and Innovation;
- Education and Skills Funding Agency;
- Teaching Regulation Agency;
- National Health Service bodies and organisations working with them e.g. Health Education England;
- · Department of Health and Social Care;
- General Medical Council.

7.4 Audit Issues

The University or Government, or their respective agents, will check the accuracy of personal information provided by students against external data sources. For example, the University will test whether a student has been reported on earlier HESA or individualised learning record (ILR) returns of other Institutions and may contact those other Institutions for confirmation of any qualifications obtained. Your record will not be used by HESA or any of the above bodies in a way which will enable you to be identified or in a way which will affect you individually. Your contact details will not be made available to HESA.

7.5 Funding and Sponsors

Information about registration and progression will, depending on your course, be

¹ Accurate as of June 2023

passed to organisations including (but not limited to):

- the Student Loans Company/Student Finance/Student Awards Agency Scotland; and/or
- NHS Business Services Authority;
- Department of Health and Social Care;
- Department for Education;
- National Health Service bodies and organisations working with them e.g. Health Education England.

We pass on this information for funding purposes and, if appropriate, to assess eligibility for EHU Bursaries and Scholarships.

If you receive sponsorship for your University education, attendance and results may be passed to your sponsor.

7.6 Debt recovery

We will pass information to the University's external debt collection agency but we will only share sufficient information to enable action to be taken against students who have not paid their fee(s) or when referring students in payment plans to transfer collection arrangements only.

7.7 National Student Survey (NSS) and Graduate Outcomes Survey

Each year the OfS carries out the National Student Survey (NSS) which asks the views of final year undergraduate students. The OfS, or a nominated agency, may contact you to participate in the NSS and this information will be used only for that purpose. Further details are available from www.thestudentsurvey.com/.

The Postgraduate Taught Experience Survey (PTES) asks the view of postgraduate students. Advance HE, in collaboration with JISC online surveys, may contact you to participate in PTES and this information will be used only for that purpose. For this survey Edge Hill University are the data controllers, and Advance HE and JISC online surveys the data processors. Further details are available from https://www.advance-he.ac.uk/reports-publications-and-resources/postgraduate-taught-experience-survey-ptes

When you graduate, further data about you will be collected by HESA. This data is for a survey relating to what graduates do after leaving University. This is called the Graduate Outcomes Survey. You may also be contacted by HESA, or a nominated agency, to take part in a longitudinal survey.

7.8 Graduate Progression

The registration data you provide to us is held in computer and other filing systems and is shared with:

- The University Careers team to support you to find graduate employment or further study whilst you are a student and for three years following the completion of your studies;
- Related third-party accredited organisations.

All data is processed, stored and shared in accordance with current UK Data Protection legislation.

7.9 Plagiarism Software

When you submit your assessed work, it may be submitted to a Plagiarism Detection software database.

7.10 SMS Text Messaging including Emergency Situations

The University may contact you by text message via an external provider. We may use text messaging to contact you in a range of circumstances including:

- cancellations or changes to the teaching timetable;
- cancellation or changes to the arrangements for placements;
- advising or reminding you of an appointment or deadline; or
- in emergency situations.

7.11 Edge Hill Students' Union

When you join a course, you will automatically become a member of Edge Hill Students' Union (EHSU). We do this to help the EHSU in managing its membership and to help it provide appropriate services to our students. The EHSU is a Data Controller and as such manages data in accordance with the DPA and other information security legislation. All requests for information held and/or processed by the EHSU should be made directly to them.

You can opt out of membership by contacting the EHSU at sudataprotection@edgehill.ac.uk.

7.12 Disclosure and Barring Service (DBS)

The law requires the University to undertake a Disclosure and Barring (DBS) check on students who are involved in 'regulated activities'. These include working with children or vulnerable adults. During the Disclosure and Barring process, the University may transfer your personal information to the Disclosure and Barring

Service to allow routine vetting to take place. Under the Safeguarding Vulnerable Groups Act 2006 the University may also share information, this however will be kept to a minimum and where this includes sensitive personal data, the University may be required to ask for your consent.

7.13 Study Abroad and Exchange Students

We may need to share personal data with another University or educational institution if your course of study:

- involves an exchange programme;
- is run in collaboration with another institution or organisation; or
- involves work experience or similar provision.

Sharing of personal data in such circumstances is kept to a minimum. If the data includes sensitive personal data in certain circumstances the University may require consent to share. You will be contacted directly should consent be required.

7.14 Placement Students

If your course of study involves a placement element, we will need to share your personal data and enrolment photograph with placement providers in order to allow arrangements to be made for your placement. Sharing of data in such circumstances is kept to a minimum. If your data includes sensitive personal data, in certain circumstances consent may be required.

7.15 Edge Hill Sport

You will be automatically registered with Edge Hill Sport Ltd at enrolment. If you wish to opt out of automatic registration, please contact the Head of Sports Services at edgehillsport@edgehill.ac.uk.

7.16 Disclosure of your status as a student

We will disclose information about your status as a student to:

- the Department for Work and Pensions (DWP) in connection with applications for benefits or as part of a criminal investigation;
- local authorities in connection with council tax, electoral registration and for investigating benefit fraud;
- the police and the courts;
- United Kingdom Visa and Immigration service.

We may disclose information to other organisations that are not listed but only if there is a legitimate reason for doing so.

7.17 Graduation and certification

We may share information with third party service providers for the purposes of arranging graduation ceremonies and issuing certification. Sharing of such data will be kept to a minimum. Such suppliers may include:

- the University's ceremonial gown supplier;
- photography company;
- specialist printing companies.

When storing or sharing your data we will act in accordance with compliance requirements of current UK Data Protection laws.

8 How long the University will retain your personal data

The University must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the University has taken into account:

- the nature, sensitivity and volume of the personal data;
- the potential risk of harm to you arising from the University's continued retention of the personal data;
- the purposes for which the University may process your personal data;
- whether the University is required to retain any personal data by law or in accordance with its legitimate interests.

9 Access to your personal data: your rights

You have a number of rights in relation to the processing of your personal data by the University:

- Access: You have the <u>right to request access</u> to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the University is processing it lawfully and fairly.
- **Correction:** You have the <u>right to request correction</u> of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the <u>right to request erasure</u> of any personal data held about you where there is no good reason for the University to continue processing it,

or where you have exercised your right to object to the processing of your personal data.

- **Restriction:** You have the <u>right to request restriction</u> of how the University processes your personal data, for example, to confirm its accuracy or the University's reasons for holding it or as an alternative to its erasure.
- Objection: You have the <u>right to object</u> to the University's processing of any personal data which is based on the legitimate interests of the University, or those of a third party, relating to your particular circumstances. You also have the right to object to the University processing your personal data for direct marketing purposes.
- Portability: You have the right to receive or request that the University transfers a copy of your personal data in an electronic format where the basis of the University processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.

To exercise any of these rights you will need to contact the University's Data Protection Officer at dataprotection@edgehill.ac.uk. The University may be entitled to refuse any request in certain circumstances, and you will be notified accordingly where this is the case.

Where the lawful ground relied upon by the University to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, the University may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the University may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the University may ask you to verify your identity before fulfilling any request in relation to your personal data.

You also have the right to see a copy of the data held by HESA or if you have any concerns or objections to the use of data please contact: HESA at www.hesa.ac.uk/fpn or by writing to 95 Promenade, Cheltenham, GL50 1HZ.

The HESA privacy notice for students – the 'Student Collection Notice' is published at https://www.hesa.ac.uk/about/regulation/dataprotection/notices

If you are dissatisfied with the University's collection, processing or handling of your data and/or related requests from you, you have the right to complain to the <u>Information Commissioner's Office (ICO)</u>.

10 Changes to this Notice

This Notice may be amended or updated throughout the year. Where this occurs, Edge Hill University will announce the change on its website. Once this has been done, you will be deemed to have accepted the changes.

11 Help and Advice

Edge Hill University is a community built on mutual respect and trust. We recognise that our staff and students rely increasingly on digital technology for everyday tasks and that smartphones, tablets and laptops make it possible, and at times advantageous, to record conversations and meetings with little more than a keystroke. Supporting an environment which values the principles of consent and consensus however, Edge Hill University will not condone the making of electronic or digital recordings of meetings (in person or virtually) or telephone calls, unless all participants have been properly notified and given their clear permission for recording to take place. Covert recordings must not be taken and to do so may be considered a disciplinary offence.

If you have any queries regarding your personal data held by the University, please contact the Data Protection Officer at dataprotection@edgehill.ac.uk.

The Information Commissioner's Office <u>website</u> contains helpful information about data protection.

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