



Bangor University: Privacy Notice for Students (Prospective and Registered) 2020-21

1. Introduction

Bangor University (BU) is the data controller in relation to your information, as defined in the Data Protection Act 2018 and is committed to protecting your rights, in line with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

The University's nominated representative for data protection legislation, and the Data Protection Officer is:

Head of Governance and Compliance
Governance and Compliance Office
Corporate Services
Bangor University
College Road
Bangor
Gwynedd
LL57 2DG

This statement explains how the University handles and uses your personal information at the enquirer and applicant stages, during your time as a student and also after you graduate. The University is committed to protecting your personal information and to being transparent about what information it holds. The University has a range of data protection related policies and procedures in place which can be found here:

<https://www.bangor.ac.uk/planning/dataprotection/index.php.en>

Personal information can be collected both centrally, and by Schools and departments of the University, for example by Student Support Services, Pontio Arts, Canolfan Brailsford, and further fair processing/privacy notices will be provided at the point of collection of your data as required.

2. What information do we collect about you?

BU will collect information about you throughout its dealings with you as a prospective, current and former student, for example, when you apply, when you enroll and as you progress through your course. We may also receive information about you from outside the University, such as information from UCAS relating to undergraduates' UCAS applications, supplementary information requested by the University, as well as information supplied by referees. The types of personal information processed include, though is not limited to, the following:

- Contact details and other information submitted during the enquirer, application and enrolment processes.
- Details of courses, modules, timetables and room bookings, assessment marks and examinations.

- Evidential information gathered in relation to academic support processes such as special circumstances, academic integrity investigations.
- Financial and personal information collected for the purposes of administering fees and charges, loans, grants, scholarships and hardship funds.
- Photographs, and video recordings for the purpose of recording lectures, student assessment and examinations.
- Information about an individual's engagement with the University such as attendance information collected through the Check in App, and use of electronic services such Blackboard.
- Contact details for next of kin, or others, to be used in an emergency.
- Information related to the prevention and detection of crime and the safety and security of staff and students, including, but not limited to, CCTV recording and data relating to breaches of University regulations.
- Information gathered for the purposes of equal opportunities monitoring.
- Information relating to the provision of advice, support and welfare, such as data relating to the use of the services offered by the Student Support Service.
- For international students (including EU students): Copies of passports, visas and any other documents required to ensure compliance with Home Office requirements as well as biometric data for attendance purposes.
- For UK students: Copies of passports or any other documents required to ensure eligibility to receive financial support from the UK government and in compliance with right to study and identification requirements.

Some of this data may be categorized as special categories data, as defined by the Data Protection Act 2018.

3. How will your information be used?

It is not possible to state every purpose for which your information will be used by BU during your interactions with us. The following are examples of how information is likely to be used. Please be aware that a core record will be retained after you graduate and will be used as outlined below. The number in brackets refers to the legal basis relied upon by the University in order to lawfully process your data, as defined by the General Data Protection Regulation.

- To make contact with you as a prospective student in order to provide you with information about the university, relevant courses, our university facilities, information you may need in order to apply for a visa, information on our university accommodation and any other relevant information to assist you in making your choice.
- To administer your studies and record academic achievements (e.g. your course choices, examinations and assessments, and the publication of pass lists and graduation programmes) **(i), (iv)**
- To assist in pastoral and welfare needs (e.g. the counselling service and services to students with disabilities) **(ii)**
- To administer support for all your employability needs (e.g. accessing careers advice). Your information may be processed by a third party under contract in order to ensure you have access to a range of employability services that complement the University's own resources. Your

information will be held after you graduate in order to ensure you maintain access to the full career development support that the University offers all of its graduates. **(iii)**.

- To administer financial aspects of your enrolment as a student (e.g. payment of fees, debt collection) **(i)**.
- To provide or offer facilities and services to students (e.g. accommodation, sporting facilities, computing facilities and the Library) **(i), (ii), (iii)**.
- To carry out investigations in accordance with academic and misconduct regulations **(i)**
- To operate security, disciplinary, complaint and quality assurance processes and for general identification purposes **(i)**.
- To produce management statistics and to conduct research into the effectiveness of our programmes of study as well as produce statistics for statutory purposes **(iv), (v)**.
- To monitor attendance and engagement of all students, and for international students (including EU students) on Visas to ensure compliance with their terms of their sponsorship **(iv)**.
- To maximise individuals' opportunities to succeed through the use of learning analytics which are used to monitor your engagement with your studies. This will involve the processing of data such as attendance, assessment and VLE (Virtual Learning Environment) usage to develop an overall picture of engagement. Such processing will only take place where it is necessary for the pursuit of the legitimate interests of the University or the student and only where the processing is not unwarranted and will not cause a prejudicial effect on the rights and freedoms, or legitimate interests, of the student. Special category personal data will only be processed where the University is looking at trends and pattern analysis to produce management statistical reports **(iii), (v)**.
- To monitor our responsibilities under our equalities legislation policies **(iv), (v)**.
- For Higher Education Statistics Agency (HESA) purposes - BU is required to send some of the information which we collect about you to HESA for statistical analysis purposes **(iv), (v)**.
- For Higher Education Statistics Agency (HESA) and/or a third party under contract, to conduct the Graduate Outcomes Survey after you graduate **(iv)**.
- To share information with Public Health Wales in relation to the notification of notifiable infectious diseases.

Please note that details relating to the processing of your personal data by the Higher Education Statistics Agency can be found here:

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>

- For the Higher Education Achievement Report (Diploma Supplement) – to provide more detailed information about your learning and achievement than provided by the traditional degree classification system **(iv)**.
- For Council Tax exemption purposes where personal information is shared with Local Authorities **(iii)**.
- For inclusion in the graduation brochure produced for the Graduation Ceremony **(iii)**.
- To make contact with you after you graduate about alumni membership and events, new developments at the University and to update your communication preferences to ensure your experience of the Alumni Association is as rewarding as possible **(iii), (ii)**.
- To verify awards, provide transcripts of marks and to provide academic references for career support after you have graduated **(iii), (iv)**.

- To assist the Students' Union in their administration of elections and to facilitate its running in a fair and democratic manner. Where consent has been provided, the University will also share ethnicity data to enable the Student Union to monitor and promote BME engagement **(iii), (ii)**.

Legal basis for processing your information

- (i) *By commencing or enrolling as a student with us, BU will be required to collect, store, use and otherwise process information about you for any purposes connected with teaching, support, research, administration, your health and safety and for other reasons deemed necessary for the **performance of your contractual agreement with the University**. We will also use your information for certain purposes after you cease to be student. See GDPR Article 6(1)(b)*
- (ii) *The University **will obtain consent from you** in order to assist with your pastoral and welfare needs (e.g. the counselling service and services to students with disabilities). See GDPR Article 6(1)(a).*
- (iii) *Processing of your personal data may also be necessary for the **pursuit of our legitimate interests** or by a third party's legitimate interests -but only where the processing does not fall within our core public function, is not unwarranted and will not cause a prejudicial effect on the rights and freedoms, or legitimate interests, of the student See GDPR Article 6(1)(f).*
- (iv) *Processing of your personal data is necessary for the **performance of a task carried out in the public interest** or in the exercise of official authority vested in the University (see GDPR Article 6(1)(e)) and for statistical and research purposes (see GDPR Article 89).*
- (v) *Processing of Special Categories data is necessary for the **statistical and research purposes** in accordance with article 89(1) based on the duties in the Equality Act 2010 (see GDPR Article 9(2)(j))*

4. Who receives your information?

Where necessary, in order to provide the services which we have informed you of, personal information will be shared internally between academic and professional service departments across the University. Personal information being shared in this way will be protected by the University as set out in its *Information Security Policy*, and information will not be disclosed to third parties without your consent, or, unless it is permitted by law or contract.

This section outlines the major organisations and the most common circumstances in which the University discloses information about its students. Where this involves international transfer, information will only be transferred if it meets the conditions outlined in the Data Protection Act 2018.

- **UK NARIC** – As part of the Admissions process for International students, on occasion, BU may use the NARIC Member Enquiry services related to checking, verification of qualifications and fraud prevention which requires transfer of documents and data sharing, such as qualification certificates bearing the names and details of applicants, or other documents containing personal details, that have been provided to BU.
- **Higher Education Statistics Agency (HESA)** - BU is required to send some of the information which we collect about you to HESA for statistical analysis purposes and to conduct the Graduate Outcomes survey.
- **The Higher Education Funding Council Wales (HEFCW)** in line with our statutory responsibilities.

- The University is licensed to sponsor migrant students under Tier 4 of the points-based system. The University will provide data about students on the Tier 4 Student Visa to the **Home Office** and its departments in order to fulfil its duties under its license.
- **Sponsors and parents**, only where consent has been provided.
- **Other Higher Education Institutions** if, for example, your programme of study involves spending a period of time at an institution outside BU, including at a higher education institution abroad or if you have come to BU as a visiting or exchange student, we may need to share information about you with the other institutions involved in the exchange. This will be done for the administration of the visit, exchange or study abroad, and so that the other institution can carry out its duties in regard to your studies. Personal data may also need to be shared during the course of other collaborative projects or circumstances whereby verification of qualifications or personal data is required. In limited circumstances personal data will also be shared where there is a concern about your welfare or engagement.
- **Professional bodies** (e.g. Law Society) in order to confirm your qualifications and accredit your course.
- **Work placement sites** or educational partners involved in joint course provision.
- **The Student Loan Company** to confirm enrolment, attendance and identity in order that students can access financial support.
- **Debt recovery and control companies** in order to recover debt on behalf of the University, where internal debt recovery procedures have been unsuccessful.
- **Potential employers** that you have approached.
- **Providers of education** that you have approached (e.g. for qualifications checks).
- **UK agencies with duties relating to prevention and detection of crime**, collection of a tax or duty or safeguarding national security. You should note that there is a statutory duty for higher education institutions to have due regard to the need to prevent individuals from being drawn into terrorism. This may mean that, in particular circumstances, the University will need to pass on personal data to coordinating bodies and partner organisations such as local government and the police. Also courts or Coroners' Offices.
- **Plagiarism detection service providers** in accordance with the relevant contract. These service providers may be outside the European Union.
- **Local Authorities** for purposes of council tax exemption where it is necessary for the pursuit of the legitimate interests of the Local Authorities or yourself, but only where the processing does not fall within our core public function, is not unwarranted and will not cause a prejudicial effect on your rights and freedoms, or legitimate interests.
- **Electoral Offices** in order to facilitate self-registration. Please note that the University, itself, does not register you to vote. You should check with the Council's Electoral Office to ensure that they are on the electoral register. See <https://www.gwynedd.llyw.cymru/en/Council/Voting-and-elections/Register-to-vote.aspx> (3).
- **Students' Union** where it is necessary for the pursuit of the legitimate interests of the Students Union or yourself, in order to take part in democratic processes, benefit from representation services, join sports clubs and societies and receive communications. Where consent has been provided, the University will also share ethnicity data to enable the Student Union to monitor and promote BME engagement. A data sharing agreement governs this process which facilitates the University's obligations under section 22 of the education Act 1994.

- **Auditors, solicitors, insurers, debt collection agencies and other agents of the University** may require access to personal data from time to time where this becomes necessary. These decisions will always be made on a case by case basis by the Head of Governance and Compliance.
- **Other partners (such as local authorities, health trusts)** where it is necessary to do so in relation to the application process for specific degree courses e.g. Conwy, Ynys Môn and Gwynedd local authorities in relation to the MA Social Work.
- **Canadian Revenue Agency (CRA)** for the purposes of maintaining Bangor University's Prescribed University status to enable donors in Canada to give tax efficiently, for students who meet the criteria information. This information is required by the CRA as proof that Bangor University educates Canadian citizens. The data will remain with the Canadian Revenue Agency and is given solely for purposes of verification.
- **Oxford International Education Group (OIEG)** for recruitment and admission purposes.
- **Public Health Wales** in relation to the notification of infectious diseases.
- **NHS Wales Test, Trace and Protect Service** to support the contact tracing process under Covid-19 regulations, when required.
- **Gecko Engage** to capture enquiries from prospective students, and to register attendees at our virtual and on campus events.
- **UniQuest** in relation to conversion activities with prospective students.
- **Quadiant** for the purposes of sharing of data relating to the University's parcel tracking system and parcel locker system.
- Any other disclosures that the University makes will be in accordance with data protection legislation and your interests and rights will be carefully considered.

5. Further information relating to your data

Automated decision-making, including profiling

The University may undertake automated decision making in only a limited number of circumstances, those usually relating to assessment of fees status, suitability for financial assistance and in the area of learning analytics. If you have any queries relating to these processes please contact the Data Protection Officer.

Transfers to Third Party Countries outside the European Union (EU)

In order to achieve the purpose for which we are processing your data, we may need to share your data with organisations outside the EU. In these circumstances the University will ensure that appropriate safeguards are in place. In most cases, transfers will be necessary for the performance of the contract between you and the university and/or will be undertaken with your consent.

Third party services

The University may use, under contract and agreement, third party suppliers or processors to provide particular services to students, such as email or data storage. These services will be compliant with GDPR and data will, normally, be processed within the EU. Similarly, the University or external organisations, may use third parties to undertake survey or other work which may involve these third parties having access to your data.

Non-UK based students

Information relating to students based at non-UK sites may also be provided to appropriate official bodies (equivalent or similar to those listed in 4 above) in those countries in which they are based.

Your rights

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information. If you have provided consent to BU to process any of your data then you also have a right to withdraw that consent. Please visit the University Data Protection webpages for further information in relation to your rights:

<https://www.bangor.ac.uk/governance-and-compliance/dataprotection/index.php.en> Any requests or objections should be made in writing to the University Data Protection Officer.

Security

Data protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, and paper files will be stored in secure areas with controlled access. Further information on these processes can be found in the University's *Information Security Policy*.

Retention

The University retains your information in line with established higher education retention schedules. A core record showing your dates of attendance, details of your degree or other qualification or other outcome will be held in permanently. Further information can be found in the University's retention schedule which can be accessed here:

<https://www.bangor.ac.uk/governance-and-compliance/records-management.php.en>

Bangor University Student Card

As a Bangor University student, you will be supplied with a student card which is used for a range of access, recording and identification processes. The printed card will contain your photograph and name and you may be required to show this to University staff for identification purposes.

Complaints

If you are unhappy with the way in which your personal information has been processed you may, in the first instance, contact the University Data Protection Officer using the contact details above.

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

The Information Commissioner
2nd Floor
Churchill House

Churchill Way
Cardiff
CF10 2HH
Tel: 02920 678 400

Your responsibilities

You have a responsibility to keep your personal details up-to-date. During the course of your studies there are a number of circumstances in which you may have access to personal information about others, either at BU or elsewhere, such as at a work placement. You are expected to treat this in a responsible and professional manner and are legally required to do this under data protection legislation, as well as any professional ethics, codes of conduct or local rules and regulations. If you are made aware of personal information in confidence you are expected not to disclose this information to anyone without that individual's consent, unless there are exceptional circumstances. You should also not seek to gain others' personal data if you are not entitled to it. Disciplinary action will be considered for any University student who breaches data protection legislation or a duty of confidence.

For further information consult the University's *Data Protection Policy*.

*Reviewed by the Head of Governance and Compliance
for the 2020/21 academic year
September 2020
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