

|  |  |
| --- | --- |
| Version number: | 1.11 |
| Policy owner: | Data Protection Officer |
| Effective date: | 01/08/2022 |
| Review date: | 20/01/2025 |

PRIVACY NOTICE

APPLICANTS, STUDENTS AND ALUMNI

From the point you enter a contract with the University, following acceptance of a course offer, you agree to the University collecting and using your individual personal data. This Privacy Notice explains how the personal data, including special category data, the University of Chichester collects from you may be used. This includes information relating to your application to study, all aspects of the academic administration of your study, associated financial matters such as fees and bursaries, your personal welfare, and your access to University facilities. **This Notice should be read alongside the University of Chichester Privacy Standard available from the Data Protection Officer, or online here:**

##### [**https://www.chi.ac.uk/about-us/policies-and-statements/data-protection**](https://www.chi.ac.uk/about-us/policies-and-statements/data-protection)

The University has a central procedure for dealing with all requests for access to personal information, in accordance with current data protection legislation. You are entitled to ask for your own personal data (a “subject access request”), however, this does not extend to the personal data of others. See further information below under “Further Information?” and “Your Rights” sections at the end of this Privacy Notice.

We use student data for internal reporting and statistical analysis connected with the management and planning of the University, and for compliance with legal obligations such as monitoring of Equality of Opportunity. We also use student data for internal surveys about your student experience, including (but not limited to) the Induction Survey for first year undergraduates. We may attach data such as programme of study and mode of study to your responses. All data collected in internal surveys are held securely. We have processes in place to ensure we do not identify any individuals when reporting results, and use our best efforts to ensure that no individuals can be identified by implication. Responses to internal surveys are anonymised and grouped before results are reported.

While personal data is mostly collected and maintained through Admissions and Academic Registry, the University will disclose that data to authorised users within the University to support the activities described above. Our policy is to only disclose personal information outside the University if you have asked us to do so, or have agreed to the release of your data, or if we are under a contractual or legal obligation to release the personal data, or where a data protection exemption applies such as prevention or detection of crime, or where the University has a legitimate interest, that is proportionate having regard to students’ individual rights, freedoms or legitimate interests.

The list below includes some of the uses to which the University will put your personal data, however, it is not possible to list all of the uses, or to list all of the bodies with whom we might have to share your personal data, where we have a legal basis for doing so in connection with your time here at the University.

We shall not disclose information about you to third parties, even to a parent or guardian, without your explicit consent, other than as described in paragraphs 22, 23 and 24 below.

1. APPLICATION, OFFER AND REGISTRATION

When you make an application to study with us, accept an offer of a place, or register as a student, we will collect from you the data that you submit to us about yourself, your qualifications, and any other information you provide. We will only ask you for what is necessary, and we will use the information you provide to us to manage and consider your application, to make an offer to you, and to manage your studies at the University and our relationship with you. If you fail to provide information which is required, this may affect our ability to make an offer to you or to register you as a student.

1. STATUTORY RETURNS AND EXTERNAL SURVEYS

We are required by the Office for Students (OfS) to collect certain data which is passed to the Higher Education Statistics Agency (HESA). HESA also requires us to contact graduates and ask about their employment after leaving the University. For our degree apprentices we are required to provide certain data to the Education and Skills Funding Agency (ESFA).

OfS also requires us to pass contact information about finalists to Ipsos MORI to carry out the National Student Survey (NSS). HESA’s Fair Collection Notices can be seen on the HESA website, <http://www.hesa.ac.uk/collection-notices> and more information about the NSS on the NSS website <http://www.thestudentsurvey.com/>.

We have a legal obligation to process your personal data for the purposes of the Graduate Outcome Survey and as part of this we will also provide contact information to Confirmit to undertake the Graduate Outcomes Survey approximately 15 months after graduating.

In addition, the University participates in national surveys on student engagement and student experience, including (but not limited to) the UK Engagement Survey (UKES), Postgraduate Taught Experience Survey (PTES), the Postgraduate Research Experience Survey (PRES), and the Skills Funding Agency FE Choices Learning Satisfaction Survey. Your contact details, programme of study, mode, and certain demographic information may be attached to your responses, however responses are anonymised and grouped for analysis at institute and sector level. Participation in the student experience surveys is optional and a data protection statement provided on the first page of each survey.

1. TEACHER EDUCATION STUDENTS

For students on courses of Initial Teacher Training, we are required to report to the Department for Education (DfE) so that certificates of Qualified Teacher Status (QTS) can be issued by the Teaching Regulation Agency (TRA), an executive agency of the DfE. We will also pass to the DfE the University of Chichester email addresses of QTS students to enable them via the TRA to contact students direct regarding their QTS certificate.

1. PROFESSIONAL, STATUTORY AND REGULATORY BODIES (PSRBs)

The University may disclose data about you to PSRBs where this is necessary for the performance of its contract with you. For example, if you study a programme which is accredited by an external body, such as the Nursing and Midwifery Council, the University will disclose information about you and your progress to that body to enable you to gain and manage your accreditation.

1. SLC AND LOCAL AUTHORITIES

Other examples where we are under a legal obligation to disclose data are the provision of information to the Student Loans Company.

The University has data sharing agreements in place with some local authorities for the purpose of processing Council Tax exemptions for eligible students. Our legal basis for sharing applicable personal data for this purpose is legitimate interests. These arrangements ensure a more efficient service or students who are eligible for Council Tax exemption and reside in participating local authorities. You have the right to object to this processing by emailing the University and stating the specific reasons for your objection to the processing of your data.

The University may be asked to share your personal data with Electoral Roll Officers (ERO) who have a statutory duty to process certain personal data to maintain the electoral register and for the purpose of administering an election. We will require your consent to do this via an opt-in when you register on your course. You can withdraw your consent at any time by emailing StuRecords@chi.ac.uk.

Our Tuition Fee Policy states that we may disclose relevant information to a Debt Collection Agency appointed by us should you fail to pay fees due to the University.

1. TURNITIN

The University requires all students to submit their assessed coursework assignments via Turnitin. You should be aware that in submitting work to Turnitin for text matching you are agreeing with Turnitin®UK that it can be electronically checked for matches with existing sources and that an Originality Report can be generated.

The final submission you make to any Turnitin assignment will be kept on the Turnitin®UK database *permanently*. Work held on the Turnitin®UK database may be used for the purpose of detecting the future plagiarism of your own work and or in any investigation of suspected academic malpractice.

Originality Reports - generated by you or a member of staff - may be used to assist in the identification of plagiarised work submitted for formal assessment. An Originality Report will never be advanced as the sole reason for suspecting that a piece of work is plagiarised, nor may an Originality Report be advanced as the sole defence against an accusation of plagiarism.

Turnitin®UK has a [Privacy Pledge](http://www.turnitinuk.com/en_gb/about-us/privacy-pledge) and a [Usage Policy](http://www.turnitinuk.com/en_gb/about-us/usage-policy). It is recommended that you familiarise yourself with the contents of these.

1. HOME OFFICE: UK Visas & Immigration (UKVI)

Should you be from outside the UK, and are entering under the UKVI Student Route we may be required to disclose information relating to your course registration, attendance and progression to UKVI.

1. PLACEMENTS

If you are on a course of study at the University which requires study, employment or a placement at another organisation it may be necessary for the University to transfer personal data to that organisation. Personal data or special categories of personal data, however, will not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, other than in specified circumstances.

1. STUDENT ATTENDANCE AND ENGAGEMENT

The University uses an attendance management system, which operates by recording students tapping in to on-campus timetabled sessions. The primary purpose of this system is to enable relevant staff to more quickly identify students who, based on their non-attendance, may be at risk of under-achieving, being deregistered, or leaving the University entirely. Students will be able to see their own attendance records for their on campus, timetabled sessions. Communications about any absences will be stored in the attendance management system, and will only be accessible by the student and relevant staff members. Attendance data will be stored securely on on-site servers and transferred to Microsoft Azure Cloud Server until the student graduates.

In addition to the above, academic tutors, academic advisors or other appropriate staff involved with your course, and/or Student Support colleagues may look at data on other University systems, particularly Moodle, for the purposes of managing student attendance and engagement with their modules/course. This may apply particularly when teaching sessions are delivered on-line.

The Student Attendance, Engagement and Absence Policy is accessible here: <https://www.chi.ac.uk/about-us/policies-and-statements/academic-and-student-support>.

1. OTHER CONTRACTS WITH THIRD PARTY, EXTERNAL SUPPORT PROVIDERS

* The University has a number of established contracts with third party, external support providers of systems which are crucial to supporting key University services and functions e.g. virtual learning environment (VLE), finance, student records, placements. These may change from time to time in line with periodic contract review points.
* To operate security (including CCTV), governance, audit and quality assurance processes and arrangements.
* University auditors and, where required, other statutory bodies acting in an audit capacity e.g. OFSTED, UKVI.

1. INFORMATION/IT SECURITY

In certain circumstances logs will be retained for a limited period of time e.g. activity relating to access to websites that may represent a risk to the University or individuals. Such data will only be interrogated if anonymous analysis of patterns/trends of behaviour trigger (on the authority of the University’s Vice-Chancellors’ Group) the need for further investigation. For more information about this you can access the University’s Electronic Information Security Policy here: <https://www.chi.ac.uk/about-us/policies-and-statements/it-information-and-web>

1. E-TRANSCRIPTS/HIGHER EDUCATION ACHIEVEMENT REPORT (DIPLOMA SUPPLEMENT)

Post-September 2022, all new students will receive an e-Transcript. Students who started pre-September 2022 will continue to receive a Higher Education Achievement Report (HEAR) or a hard copy Diploma Supplement as applicable. Both the e-Transcript and the HEAR will be delivered via a secure web portal called Gradintelligence. This cloud service will receive and hold personal data about you from our Student Records System and will be delivered and supported by the suppliers (Tribal) of the University’s admissions and student records system. Students will receive full instructions about how to activate their accounts via Gradintellingence, so that they can access information released at any time during their time at University and afterwards. Students will have access to their e-Transcript or HEAR in perpetuity via Gradintelligence. More information about the this can be found here in the online Student Handbook accessible via Moodle.

1. REFERENCES AND CONFIRMATION OF QUALIFICATIONS

The University may release data about you in response to a request for a reference or for confirmation of your qualifications. Please note that we will only comply with a reference request where it is clear that the enquirer has the right to ask for the information, which will typically involve the consent of the former student to disclose their information. Further information about how third parties can verify qualifications can be found here: <https://www.chi.ac.uk/study-us/student-services/careers-and-employability/verify-student-qualifications>

1. UNIVERSITY OF CHICHESTER STUDENTS’ UNION

The University shares student personal data with the University of Chichester Students’ Union (UCSU) in order for the Union to administer membership of the UCSU and its clubs and societies, to communicate with members, to hold elections of officers, to ensure the safety and security of members (including identification of individual members) to provide welfare services, to market services provided directly by the UCSU and to analyse service provision and membership requirements. This may include passing personal data to a third party organisation which provides website and membership systems for Universities and Students’ Unions. In such circumstances, however, student personal data will remain the property of the University and will not be used by the third-party organisation for commercial or marketing purposes, or passed to any other third party. In all other circumstances the information provided to the SU shall not be passed to any third party, without the express consent of the data subjects concerned unless specific permission from the Deputy Vice-Chancellor has been given. The UCSU shall implement appropriate mechanisms for students to opt out of membership of the Students’ Union and to opt out of the use by the UCSU of all or any of their data at any time.

In addition to the above, personal data may be shared between the University and UCSU where this is in connection with an emergency, serious health or welfare issue, sexual assault, sexual misconduct, bullying and harassment, or in relation to the prevention or detection of crime. The lawful bases we might rely on when undertaking such processing may be the vital interests of an individual, an individual’s consent or the legitimate interests of a student(s) and/or others. Where we rely on the legitimate interests lawful basis individuals have the right to object to the processing of their data by emailing [DPOfficer@chi.ac.uk](mailto:DPOfficer@chi.ac.uk) and setting out the reasons for their objections.

This data sharing is in accordance with a Data Sharing Agreement between the University and UCSU, which is located here: <https://www.chi.ac.uk/about-us/policies-and-statements/data-protection>

1. LECTURE RECORDING

Staff are encouraged to record suitable teaching sessions, so that students can replay them throughout their studies. It is the responsibility of the person making the recording to ensure that all participants are informed about what is being recorded, where the recording will be made available and who is able to view the recording.  Recordings will be created and stored securely and by default they will only be shared with participants registered on that specific module.

When recording a lecture, it is usually assumed that only the presenter will be captured “on-camera”, unless capturing participants is necessary, in which case consent should be sought. If recording in a physical space (in a lecture room, lab), a specified area in the room should be made available, off-camera, for those who do not wish to be recorded.

By agreement, some recordings may be made available for wider viewing, for example, by a subsequent year’s cohort on a particular programme, or publicly via the University’s website and potentially through a video streaming public access website. If there is an intention to do this, it must be set out in the recording details for the (original) session on the Moodle page and in both cases consent must be sought from those appearing in the recording.   Except where authorised by the University and subject always to the consent of the participants, recordings of any University activities are not for public disclosure.

If the recording is collecting special category data, explicit consent must be obtained.

You can access the full Lecture Recording Policy here: [Lecture Recording Policy](https://mailadminchiac-my.sharepoint.com/:w:/g/personal/m_hall_chi_ac_uk/EUzvPaGWYMZInF1S-IPlQisBj03bzycHVvg_aXyEvTNfPg?e=RNoOKj.)

1. PHOTOGRAPHY AND FILMING

We store the photograph used on your student Campus Card but we will not display your photograph publicly (e.g. on notice-boards) without your consent or release your photograph outside the University. Photos will be deleted after completion of your studies and no later than 5 years after your original photo was uploaded. For any students studying with us for longer than 5 years we request that their photograph is updated to ensure we have a current student image. Students will receive a prompt via ChiView to update their photo.

The University may also occasionally commission photographs around the campuses, or at specific events such as Graduation, and those may include images of students for inclusion in promotional material. You should be made aware of the location(s) where the photographs or film will be made available (e.g. Social media, University website) via a location warning notice, verbally or via a consent process prior to the taking of photographs or film recording. If you do not want your image to appear in publicity materials please make yourself known to the photographer.

Some areas of the University are accessible to the public, e.g. the Learning Resource Centres, so they are considered public areas. This means that filming or photography may take place that incidentally captures passers-by in the background, without the need to get their consent. However, a location warning notice should still be displayed that contains information on who to contact if you have any concerns.

1. POSTGRADUATE AND UNDERGRADUATE DISSERTATIONS AND INDEPENDENT PROJECTS

The University of Chichester Library holds copies of postgraduate and undergraduate dissertations and independent projects (IPs) written by our students. A selection of these are available in print and online. These documents are held for the benefit of students and members of the public who may wish to review examples of good practice and/or refer to research already undertaken in their area of study. This is part of the University’s public task as an education institution.

The categories of personal data usually included are: student name and/or student number and names of other individuals e.g. in the acknowledgement section. Any individual may object to their project or dissertation being included in the library collection, or may ask for it to be removed, by contacting [help@chi.ac.uk](mailto:help@chi.ac.uk) in the first instance and stating the reason for their objection/request.

These documents will be held by the Library Service for up to five years. Postgraduate dissertations will be held for a period agreed with the relevant academic department. Following expiry of the agreed retention period the items will be de-accessioned in line with the Stock Retention, Withdrawal and Donations policy. Students can access this document under “Library Policies” here: <https://help.chi.ac.uk/policies#Librarypolicies>.

More information is accessible via the Dissertations and Independent Projects Policy, under the Library Policies section of Moodle: <https://moodle.chi.ac.uk/course/view.php?id=70248&dash=1>. *Note: this Policy does not cover PhD theses or other student assessments.*

1. GRADUATION, CAREERS AND ALUMNI RELATIONS

The University will also use your contact details to keep you informed of initiatives relating to your time at the University e.g. careers services or postgraduate studies, as well as to provide details of the Alumni community. If you do not wish to receive these communications please contact the Alumni team by email to [alumni@chi.ac.uk](mailto:alumni@chi.ac.uk).

All eligible finalists, whether attending or not attending a graduation ceremony, will be able to consent to the following:

• Inclusion of their name and award title (but not classification) in the University's graduation programme;

• Printing of their name on the University's 'Year of [xxx] ' t-shirt or hoody;

• Inclusion of their name and award title (but not classification) in the Chichester Observer newspaper; and

• Receipt of information about University of Chichester Students’ Union Graduation events.

You will be able to opt in to any of the above by ticking the applicable boxes on your Registration and Ticket Application Form or by sending details in writing or by email to the Graduation Office at [graduation@chi.ac.uk](mailto:graduation@chi.ac.uk) by a given deadline.

More information about how your personal data is processed for Graduation purposes can be accessed here: <https://www.chi.ac.uk/about-us/events/graduation/data-protection/>.

Whilst you are a contracted student of the University we will send relevant information to your University of Chichester email account about the following:

• Careers, relevant postgraduate courses, employability and job-hunting information, advice and support;

• Alumni, careers and job-hunting publications;

• Benefits and services available to students, recent graduates and alumni;

• Events such as employability conferences, careers and employability support, employer events, lectures and reunions;

• Networking groups;

• University fundraising and other supporter engagement programmes;

• Volunteering opportunities for you as an individual or ways your company (if applicable) might want to work with us; and/or

• Requests to complete relevant surveys.

Once you have completed your studies, you will be part of the alumni community. As a registered member on our alumni database, you will be entitled to an alumni discount on a first postgraduate taught course (excluding PGCE, for which a bursary is available) or postgraduate research degree at the University. In addition, the University will continue to use your contact details (the personal email you have provided us with) to keep you informed about initiatives as indicated above and the activities of the alumni community. We will only process your personal data to send you this information where we have carried out a legitimate interest assessment. We will only share your data with third parties for marketing purposes with your explicit consent.

You will have the opportunity to unsubscribe in all email correspondence and/or may withdraw from communications at any time by contacting alumni@chi.ac.uk. Please also use this email to let us know if your contact details have changed. Full details about how your personal data is processed for Alumni purposes can be accessed here: <https://www.chi.ac.uk/alumni/data-protection/>.

1. CCTV

We use CCTV in some areas where students’ images may be routinely captured and stored for a limited period, solely for prevention of crime and apprehension and prosecution of offenders. You can access our CCTV Policy here: <https://www.chi.ac.uk/about-us/policies-and-statements/data-protection/>.

1. DISABILITY

In accordance with disability legislation we ask you about any disability you may have to enable us to make reasonable adjustments and support you. You can refuse to tell us about a disability but we will then not be able to support you so easily. We monitor the numbers of students with a disability, and the type of disability, to support our legal obligations in relation to Equality of Opportunity.

1. EQUAL OPPORTUNITIES MONITORING

We will ask you about your ethnicity and we use that data only for the purposes of anonymised Equal Opportunities monitoring. You can refuse to tell us about your ethnicity.

1. LAW ENFORCEMENT AGENCIES

We may disclose information to law enforcement agencies (such as the Police) when they invoke their statutory powers in connection with the prevention or detection of crime, and then only when we are satisfied that the request is lawful.

1. EMERGENCIES

Data protection legislation allows us to release data about you or about the person named by you for contact in emergency e.g. to a hospital or medical professional when your health is at risk and you are not able to give your consent. Our Student Services staff will always keep any record maintained to support your health and wellbeing confidential, and staff will explain any specific confidentiality policies.

1. HEALTH INFORMATION

Information on a student’s health may be required prior to admission to certain programmes of study and for purposes linked with academic progress and examinations. Information about a student’s health may also be necessary when a student undertakes fieldwork e.g. for health and safety or insurance purposes. The University may, in exceptional circumstances, contact third parties such as medical professionals or next of kin regarding the health of a student when it believes this to be reasonable and/or in the best interests of the student concerned. In these circumstances the University will attempt to gain the prior consent of the student but where consent cannot or will not be given it may act without consent.

1. DATA RETENTION

The University maintains a Records Retention schedule that describes the retention periods for our different processing activities. This is accessible here: <https://www.chi.ac.uk/about-us/policies-and-statements/data-protection/>.

The University will retain sufficient student information in perpetuity in order to confirm details of awards and to be able to provide details of your education and references when asked to do so.

1. YOUR RIGHTS

The University’s Commitment Charter sets out our pledge to safeguard information you supply to us in compliance with the requirements of data protection legislation, the Freedom of Information Act or any other statutory obligations of the University; and your right to know why we need to collect information.

You are able to see most of the data we hold about you, and update key information such as change of address, via the student portal, ChiView.

You are entitled to request a copy of the data you provide to us in an electronic format so that you may pass that data to another body (the right to data portability), as well as to request a copy of the data we hold about you (a Subject Access Request). The DPO may defer dealing with a subject access request while they validate the identity of the individual making the request. For further information about making a subject access request click here: <https://www.chi.ac.uk/about-us/policies-and-statements/data-protection>

Where we process your personal data under the Public Task or Legitimate Interests lawful bases, you are also entitled to raise an objection to the processing where the processing of data we hold about you is likely to cause you damage or distress. You also have the right of rectification of any incorrect or incomplete data, the restriction of any further processing (in certain circumstances), and the erasure of your data (right to be forgotten) when it is no longer necessary for the purposes it was collected and processed. Where the lawful basis for processing your data is consent you have the right to withdraw your consent at any time. More information about these rights is included in the University’s Privacy Standard accessible here: <https://www.chi.ac.uk/about-us/policies-and-statements/data-protection>.

Your responsibilities are that you must:

* ensure that all personal information which you provide to the University is accurate and up-to-date;
* inform the University of any changes to that information, for example, changes of address;
* check the information held by the University from time to time, in written or electronic form, and inform the University of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. The University shall not be held responsible for errors about which it has not been informed.

If you require further information about how we process your personal data, or about your rights as a data subject, including your right to object, you should contact the University’s Data Protection Officer using the details provided below.

Finally, you have the right to complain about the processing of your data to the UK regulator, the Information Commissioner’s Office. For more information about this body and how to make a complaint, please visit: [www.ico.org.uk](http://www.ico.org.uk).

1. STUDENT PROCESSING

Students may, from time to time, process personal information (for example, in course work or research). In all such circumstances the processing of personal data must comply with the requirements of data protection legislation and the University of Chichester Privacy Standard. Students must seek guidance from their Academic Department accordingly. The academic area may also wish to refer the student to the Data Protection Office.

1. FURTHER INFORMATION

Further information and advice is available from University’s Data Protection Officer:

Su Longden

DPOfficer@chi.ac.uk

Direct telephone: 01243 816020

Main switchboard: 01243 816000