



Data Protection Privacy Notice for Students (Registered or Accepted an Offer to Study)

Privacy Notice

This privacy notice explains how the University of Strathclyde will use your personal information and your rights under data protection legislation.

It is important that you read this notice prior to providing your information.

Who will process my personal information?

The University of Strathclyde is the organisation responsible for your personal data in terms of data protection legislation (the data controller).

If you have any questions regarding the handling of your personal data, or your rights, please contact the University's Data Protection Officer at dataprotection@strath.ac.uk.

How we use your information

We have set out below how we will use your information. We have tried to explain in each section where we obtain your data, how we will use your information, who it is shared with etc.

For each type of processing we are required to identify our 'lawful basis for processing'. This is set out in Appendix 1. The different lawful bases available are available via our website www.strath.ac.uk/dataprotection for both personal and special categories of personal data.

Please note, that in some cases you may be provided with a more detailed privacy notice in relation to the particular purpose for which data is collected. This is to increase transparency where required and any additional privacy notices supplement this central notice.

Your Rights

You have the right to:

- Find out what personal data we process about you and obtain a copy of the data, free of charge within one month of your request. We may make a charge for additional copies of the same information;
- Ask us to correct inaccurate or incomplete data.
- Withdraw consent to process your personal data at any time, if you were asked for and provided consent (and where no other lawful basis for processing applies).

If you think we are acting unfairly or unlawfully you can:

- Object to the way we are using your data;
- Complain to the [UK Information Commissioner's Office](http://www.ico.org.uk).

Under certain conditions you also have the right to ask us to:

- Restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns;
- Erase your information or tell us to stop using it to make decisions about you;

- Comply with your wishes where you have previously agreed to us processing your data for a particular purpose and have withdrawn your consent to further processing;
- Provide you with a portable electronic copy of data you've given us.

Please contact us if you wish to exercise/enquire about any of these rights.

Status of this document

This document has been reviewed and approved by Veena O'Halloran, University Secretary and Compliance Officer. It will be reviewed annually.

Contact Details

Data Protection Officer
 University of Strathclyde
 Information Governance Unit
 16 Richmond Street
 Glasgow, G1 1XQ
 Email: dataprotection@strath.ac.uk
 Phone: 0141 548 3217

More information

To find out more about data protection and your rights please see:

- The Information Commissioner's Office website: <http://www.ico.org.uk>.
- The University's Data Protection webpages <http://www.strath.ac.uk/dataprotection/>

Where do we obtain information from?

We obtain personal data about you from a variety of sources:

- directly from you in your application;
- throughout your life as a student, e.g. when you use services such as counselling/careers;
- from third parties, e.g. UCAS, organisations involved in the provision of joint programmes, funding bodies (SAAS etc), Government departments etc.

What information about you do we collect and use?

When you register as a student at the University we will create a central 'student record' for you. This consists of the information provided in your application and other additional information we may ask you to provide during the registration process. Other information will be added to this central record, or held in different locations across the University, during the course of your time at the University. Personal information may be held in electronic or hard copy format on various University systems relating (but not limited) to:

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| - personal and contact information (including emergency contacts); | - financial information; | - visual images (for identification purposes) |
| - social circumstances; | - education and student records; | - other University procedures or services that you have accessed (including access to buildings/facilities) |
| - employment information (if appropriate); | - disciplinary and attendance records; | |
| | - paid-for goods or services; | |

‘Special category’ personal data may also be processed, where it is appropriate and lawful for us to do so. In most cases you have the option whether or not to provide this information. This data is subject to additional protections and includes the data below:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data or biometric data (for the purpose of uniquely identifying a natural person);
- health data (mental or physical);
- sex life or sexual orientation.

NB data relating to criminal convictions and offences is subject to very strict processing requirements and is only processed when appropriate in accordance with the law.

Why do we collect and use your personal data?

The University collects, holds and uses a wide range of information about you for various reasons including:

- academic purposes: to provide you with teaching, learning and support services (including academic support and supervision and other optional services, e.g. Library, Careers, etc.); to assess your work, record your progress and confer awards;
- administration purposes: to contact students; to administer fees, funding (including ‘hardship’ funds, bursaries and scholarships) and paid-for services; campus and facilities administration; timetabling; to conduct surveys etc.;
- duty of care/pastoral care obligations and associated legal obligations;
- security, public safety and the prevention and detection of crime;
- legal obligations and statutory reporting;
- archiving and research.

Detailed information regarding the purposes for which we process your personal data and our lawful basis for processing can be found in Appendix 1.

Who do we share your data with?

Below is a summary of the most common situations in which we share your data. For full information see Appendix 1. We will share your data when:

- we work with partner institutions: student exchanges; joint/collaborative provision agreements; preparation courses for international students.
- you are funded/sponsored/supported by an external organisation, e.g. employer, embassy, research council, EU funding body, SAAS, scholarship/bursary providers (this can include non-financial support e.g. Graduate Apprentice programmes where employers support employees by providing ‘protected’ time for study);
- it’s necessary for academic administration purposes: external examiners;
- it’s necessary to arrange study/work placements or student exchange/study abroad opportunities with private or public sector organisations;
- we have a legal obligation to do so: statutory reporting to HESA, UK Visas and Immigration; electoral registration officers, government departments;



The place of useful learning

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- it relates to graduation information and ceremonies: publication in the press if you have consented to this; audio and visual images of ceremonies are considered public events and made available online;
- it's necessary for membership purposes of University of Strathclyde Students' Association (USSA);
- we have to verify your attendance/award;
- it's an emergency situation;
- third party providers of personalised, branded goods;
- where it's necessary in relation to Higher Education bodies, e.g. HEFCE, UK Research and Innovation, Universities and Colleges Admissions Service, organisations running the National Student Survey and/or other leaver surveys etc.;
- where you have complained to an external regulator regarding your interaction with the University, e.g. the Scottish Public Services Ombudsman (SPSO), Information Commissioner's Office (ICO) etc.
- we receive third party requests from law enforcement agencies or other bodies with regulatory powers.

Is my data transferred internationally?

Some personal data including attendance and progress information will be shared outside the UK if you participate/apply to participate in an international student exchange abroad, or you are studying at Strathclyde as part of a joint/collaborative provision agreement with an international organisation.

If you are an international student sponsored or in receipt of a bursary/scholarship from an organisation in your home country it is likely that the University will be required to provide information on your attendance/progress. If necessary, we may also send correspondence to you in your home country if you have provided this contact information. In emergency situations it may be necessary to transfer data internationally to emergency contacts based abroad if it is in the vital interests of the individual to do so.

If you apply via an international agent then some data will be shared with the agent during the application stage and then to confirm registration. No further data will be shared.

In some cases, the University may engage third party organisations to hold/process data on its behalf. Whenever we transfer data internationally we will make sure that appropriate safeguards are in place to protect your information and your rights to privacy.

Is my data secure?

Your personal data will be managed securely. Access will be restricted to only those staff or authorised agents who require it and on a 'need to know' basis. The University will employ any technical and organisational measures necessary to ensure the security of your data. You can find more information about our [Information Security policies](#) on our website.

Retention of Personal Data

The University will retain your personal data as long as necessary for the purposes described above. Please note that after completion of your studies the University may still require to hold your personal data for a period of time to satisfy statutory/legal obligations and/or to meet administrative requirements. Minimal data will be retained permanently to ensure a record of your educational achievements is retained. The [Student Record Retention Schedule](#) can be found on our website.

What happens after I graduate/leave the University?

Once you cease to be a registered student the University will retain your student record in accordance with the student record retention schedule. After the initial retention period a permanent archival record of your dates of attendance at the University, details of course studied, the attainment of an award (if applicable) will be retained by the University. The minimal information necessary to confirm your identity, attendance and award (if applicable) will be retained.

Minimal information including contact details, department and award are held by the University's Alumni and Development Office to fulfil our public task in maintaining alumni relations. You will be asked to consent to email marketing at the point of registering online to graduate. Please note that the University has a separate [Alumni and Development Privacy Notice](#) setting out in more detail how it uses your personal data and your rights.

Appendix 1

Category of processing	Lawful basis for personal data	Lawful basis for special category data (if applicable)
Academic purposes		
Enrolling you as a student	Public task, contract	
Administering programmes of study and research, including student exchanges, at the University	Public task, contract	
Monitoring and assessing performance, attendance/absence and engagement (use of online learning platform Myplace)	Public task, contract Legal obligation (attendance/engagement for visa purposes)	Substantial public task (attendance/engagement for visa purposes)
Managing the academic process and providing academic support, supervision and feedback	Public task, contract	
Managing the research process, including: applications; administrative and financial reporting requirements of funders; open access and data preservation requirements of funders	Public task, contract	
Retain research information outputs e.g. articles and theses in publicly and privately accessible systems	Public task, contract	
Conducting assessment and examinations	Public task, contract	
Communications with students (including by electronic means) relating to administrative matters e.g.: timetable changes; exam results; health and safety; security incidents; campus management; evacuations etc.	Public task, contract	
Conferring, confirming and verifying awards (including administration around graduation ceremonies)	Public task, contract	

Category of processing	Lawful basis for personal data	Lawful basis for special category data (if applicable)
Providing you with access to essential University services, including: IT access and support; Library; Careers; Security Services; access to buildings/facilities	Public task, contract	
Managing University policies and procedures internally including: complaints, appeals and disciplinary matters; fitness to practise; IT-related policies; assessment and feedback. Student-related policies can be found on the website www.strath.ac.uk	Public task, contract Legal obligation	Consent (appeals/personal circumstances) Defence of legal claims Substantial public interest
Seeking feedback on our programmes, facilities, student experiences etc.	Legitimate interests to benchmark, monitor and improve services, teaching and facilities	Consent
For research and statistical analysis into learning analytics	Public task, contract	
Use of anti-plagiarism service providers for the purpose of plagiarism detection, e.g. Turnitin	Public task, contract	
Administrative purposes: administering communications, applications, facilities, fees and paid-for services, campus and facilities management		
Managing financial transactions, fee/funding arrangements and payment of fees	Public task, contract	
Assessment and payment of bursaries, student financial support and other funding	Public task, contract	Consent
Where you have entered into a contract for services like accommodation or sports/exercise services	Contract or steps necessary to enter into a contract	Consent Substantial public interest
Other payments for students, e.g. graphics/print services, disciplinary fines, clubs or facilities	Contract or steps necessary to enter into a contract	

Category of processing	Lawful basis for personal data	Lawful basis for special category data (if applicable)
Surveys undertaken by the University and also by third parties (where the University has to provide data to third parties, e.g. HESA Data Futures)	Legitimate interests to benchmark, assess and improve University's performance, facilities and student satisfaction. Legal obligation	
Timetabling and room management (including requirements for disabled students e.g. requirements in Personal Emergency Evacuation Plans)	Public task, contract, legal obligation	Substantial public interest (health & safety, equality legislation)
Access to rooms, buildings and facilities	Public task, contract, legal obligation	
Testing IT systems	Public task, contract	
Registration as a member of University Alumni upon graduation. Your data as an Alumni member will be processed in accordance with the University's Alumni Privacy Notice.	Public task	
Criminal conviction declaration/PVG checks	Public interest, contract	Prevention or detection of an unlawful act) Safeguarding, i.e. protecting under 18s and "at risk" adults from neglect or physical, mental or emotional harm
Duty of care/pastoral care obligations, legal obligations and statutory reporting		
Disclosing information to third parties in emergency situations to protect your/someone else's best vital interests, e.g. a medical emergency	Vital interests of the data subject or another person.	Vital interests

Category of processing	Lawful basis for personal data	Lawful basis for special category data (if applicable)
Where we must comply with a legal obligation, e.g. providing information to electoral registration officers	Legal obligation	
To meet our legal duty of care under safeguarding laws	Legal obligation	Substantial public interest (Children and Young People (Scotland) Act, related safeguarding legislation)
To provide counselling and health services	Public interest, contract Legal obligation Vital interests Consent	Consent Provision of health treatment by health professional Vital interests Substantial public interest
To comply with obligations relating to equality of opportunity and treatment NB if you choose to disclose a disability to access support we have a legal obligation to disclose this information on a need-to-know basis to staff to ensure that reasonable adjustments are made and that you do not have to disclose the same information again.	Public Task (widening access) Legal obligation (Equality Act 2010) Consent	Substantial public interest (Equality Act 2010) Consent
To exercise or defend legal claims or comply with court judgement/order	Legitimate interests/legal obligation	Establishment, exercise or defence of legal claims
Health and safety compliance (including monitoring)	Legal obligation (various H&S legislation)	Substantial public interest (various H&S legislation)
Obligations in relation to Tier 2, 4 & 5 licence obligations (including provision of advice and services as outlined in Office of the Immigration Services Commissioner Code of Standards)	Legal obligation	Substantial public interest

Category of processing	Lawful basis for personal data	Lawful basis for special category data (if applicable)
Fulfilling statutory reporting requirements, e.g. Higher Education Statistics Agency (HESA). See HESA's Collection Notices	Legal obligation	Substantial public interest
Responding to external regulators, e.g. SPSO, ICO etc.	Legal obligation	Consent Substantial public interest (statutory powers of regulators)
Public safety and prevention and detection of crime		
Use of CCTV systems to monitor and collect images	Legitimate interests	
Monitoring use of IT facilities	Public task, contract Legal obligation	
Archiving and research		
Permanent archival record of your attendance at the university and the attainment of an award (if applicable)	Public task, contract	
Retention of promotional materials and other records of University life, including images	Legitimate interests	
Research purposes (only where ethical approval has been obtained)	Public task	Scientific or historical research purposes or statistical purposes
Management and statistical reporting to monitor and improve services/performance and for strategic planning purposes	Legitimate interests	
Publicity/promotion of the University		
Graduation ceremonies are filmed and made publicly available via the University website	Legitimate interests	
Use of still/moving images, video etc. used in marketing/publicity materials	Consent Legitimate interests	

Category of processing	Lawful basis for personal data	Lawful basis for special category data (if applicable)
Disclosure of personal data to third parties		
Student sponsors, e.g. Student Loans Company, local authorities, funding bodies, embassies, research councils, EU funding bodies, SAAS, scholarship/bursary providers, employers (where a contract/financial arrangement is in place), Skills Development Scotland (Graduate Apprentices)	Public task, contract	Consent Substantial public interest (equality of opportunity)
Employers (for GA or equivalent programmes where no financial/contractual agreement is in place between the employee and the employer in relation to the programme of study)	Legitimate interests	
To the police, law enforcement agencies or other regulatory bodies where pursuant to the investigation or disclosure of a potential crime or national security matters such as Benefits or Tax Inspectors, UK Visas & Immigrations and the Foreign and Commonwealth Office.	Legal obligation; legitimate interests: prevention/detection of crime	Necessary for substantial public interest
To professional and industrial bodies (such as the Law Society of Scotland or the NHS), including where necessary to confirm your qualifications and accredit your course	Public task, contract Consent	
Potential and current employers or providers of education approached by the student/former student	Consent Legitimate interests	
Educational institutions/companies or work placement sites involved in: <ul style="list-style-type: none"> - joint/collaborative course provision/student exchanges, e.g. Erasmus (may include progression information, results, disciplinary matters while with the other institution); - preparation courses for international students. 	Public task, contract	Consent
Third party providers of branded, personalised goods	Consent	

Category of processing	Lawful basis for personal data	Lawful basis for special category data (if applicable)
Relevant authorities dealing with emergency situations at the University	Legitimate interests: ensuring the safety and wellbeing of all on campus. Vital interests Legal obligation	Vital interests Public health or substantial public interest
Authorised agents working internationally representing and promoting the University	Legitimate interests: encouraging and supporting international applicants Contract	
Publication of award information in graduation programme and local press	Consent	
Live web-feed of graduations, audio and visual images of ceremonies available via website (including downloading)	Legitimate interests: promoting the University	
University of Strathclyde Students' Association (USSA)– data shared for membership purposes (students can choose to cease being a member)	Legitimate interests: ensure students can participate in USSA elections, activities and benefit from services	
External examiners for the purpose of assessment	Public task	