

## Data Protection Guidance for Students

### Policy and Procedures

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#### Quality Assurance Benchmarking

#### Document History

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## **I. PROCESSING YOUR PERSONAL DATA**

The College is registered to hold data about you under the General Data Protection Regulation. Processing personal information is necessary for the operation of the College as an educational institution.

Examples of how your information will be used are as follows:

- To administer your studies, record academic achievements, to determine and record your overall award outcome. The precise way in which your assessments are calculated is published in the Course Handbook and programme documentation. We retain a permanent record of all awards of the College (see 'Disclosing Your Personal Data to Third Parties', below).
- To assist in pastoral and welfare needs.
- To administer the financial aspects of your registration as a student (e.g. payment of fees, debt collection).
- To administer your Licence Agreement, if you become a residential student in bedroom accommodation owned or managed by the College (e.g. accommodation fees, debt collection).
- To administer your Tenancy Agreement, if you become a tenant of a property owned or managed by The Edward James Foundation Limited (e.g. rents, debt collection).
- To manage College facilities (e.g. Computing, Library and sports facilities).
- To produce management statistics.
- To monitor equal opportunities policies (e.g. in relation to the Race Relations Act, disability discrimination, etc.).
- To administer employment processes, should you choose to work at the College.
- For security and disciplinary purposes (e.g. through the use of security cameras and reports of incidents compiled by security staff and others).
- To enable our continued contact with you after you complete your studies (e.g. surveys of graduate work destinations and the work of the Alumni programme).

Additional processing may be required for students registered on specific programmes (or with certain funding arrangements). Under the General Data Protection Regulation an individual can request that such processing should not occur. In practice this would mean that the individual could not continue as a student of the College, since the College would be unable to carry out its basic operations, for instance processing assessment results and determining final degree results.

However, the College is able to offer some choices about the way your data will be used:

- Whether your photograph, is made available to staff within the College and for limited use on departmental noticeboards.
- Whether you are happy for the College to release your contact details to a limited number of organisations which work with the College, sometimes on a commercial basis.

- Whether you are happy for us to pass your contact details to the Students' Association.

In addition, under certain circumstances, we can exclude your details from internal directories. For further details of this, please contact the Academic Registrar at 01243 818270.

## **2. SENSITIVE PERSONAL DATA**

Some of the information about you that the College holds, such as your ethnic origin, is classified as sensitive personal data. This is collected to meet Government requirements, to monitor whether our equal opportunities policies are working and to ensure that disabled students and other under-represented groups receive appropriate support. In addition to the normal standards of confidentiality set out below on the release of your data to third parties (outside the College), we also carefully control access to sensitive data within the College, so that it is only available to people who 'need to know'. It should be noted that the College has a special protocol on the disclosure of sensitive information (which may have been given in confidence) when there are exceptional circumstances, e.g. there is a risk to a student's health or safety, a student is at risk of serious abuse or exploitation, a student's behaviour is seriously affecting others, there is a possibility that a criminal or serious disciplinary offence has been committed, or where a student's health or behaviour may compromise the College's responsibilities to outside agencies, such as partner institutions or practice placements. The general principle is that student data should be shared amongst staff only for the purposes of carrying out their normal duties. In interpreting this principle we try to be sensitive to the differing situations of groups of students. For instance, home/local contact details for *full-time* students are not normally available to members of academic staff, but tutors on *part-time* programmes are given access to students' contact details, else essential communications could be compromised. These variations to the principle of restricted access are allowed only where there is a clear balance of benefit to students themselves.

## **3. DISCLOSING YOUR PERSONAL DATA TO THIRD PARTIES**

We are required by law to collect and provide information on students to certain external agencies. These bodies include the Higher Education Statistics Agency (see 'National Data Collection: HESA', below), Student Loan Company, local education authorities and other grant-awarding bodies and local taxation authorities. We are also obliged to release information to the Benefits Agency, police and similar law officers undertaking criminal investigations, and in certain circumstances to officers of the Court in relation to civil proceedings. From time to time, institutions are asked to provide data they have collected to the Higher Education Funding Council or to other bodies acting on the Council's behalf, which may include personal details of students. As an example, the College may be required to provide student contact details for National Student Surveys.

Unless you have given permission for additional information to be provided, the only information which will normally be released to an appropriate third party (other than the special agencies referred to above) while you are a student here is:

- The fact that you are a student here.
- The mode of attendance of your programme (e.g. full-time or part-time).
- The date you started and the date you are expected to complete the programme.

Please also note that if regular progress reports are required by your funding organisation we will normally provide this information. If you have any queries about such reports, please contact your funding organisation.

Once you have completed your studies here, the details of your academic award from the College, including dates of attendance, are regarded as 'public' information (but not the fact that you have failed an award). Names of successful candidates will be published on open pass lists on campus noticeboards and in the graduation programme where applicable. This information will also be released to third party enquirers (for example, prospective employers).

You will be asked to nominate a referee when you leave the College. Your personal tutor/supervisor (or nominated referee if different) will also disclose relevant additional information about you if asked by a third party to provide a personal or academic reference for the purpose of employment or further study.

#### **4. NATIONAL DATA COLLECTION: HESA**

The College's HESA (the Higher Education Statistics Agency) collection notice for students is available in full from the [HESA website](#).

#### **5. ARCHIVING YOUR PERSONAL DATA**

In due course, your records will form part of the student records archive which is kept on computer and for a certain period in paper format. Part of your computer record will also be made available to the College's Alumni programme for approved purposes such as the construction of mailing lists.

#### **6. ACCESS TO PERSONAL INFORMATION**

The General Data Protection Regulation allows individuals to have access to certain information held about them and, where appropriate, to have it corrected or deleted. Such requests, known as Subject Access Requests, should be referred to the Academic Registry.

If you wish to make a request for information under the General Data Protection Regulation you should make your request in writing to:

The Academic Registrar  
 West Dean College  
 West Dean  
 Chichester  
 West Sussex PO18 0QZ

Please enclose the following:

- Verification of your identity such as a copy of formal photo ID (e.g. passport or driving licence)
- Confirmation of the address for correspondence
- A written request containing as much information as possible to help to locate the information you require

The College will respond to your request within 30 days from receipt. We may also contact you to discuss the data that you require and the format it will be provided in.

**The above procedure applies to current and past students, and to all other individuals who wish to make a Subject Access Request to the College.**