

Student Fair Processing Notice

The University of South Wales is the data controller and the University's Data Protection Officer can be contacted through dataprotection@southwales.ac.uk. The University is committed to protecting the rights of students in line with the Data Protection Act 1998 and the General Data Protection Regulation (GDPR).

The processing of your data is necessary for the performance of a contract as the University needs to process your personal data for purposes relating to teaching, support, research and administration during your time as a student and after you graduate. Failure to provide certain personal information could mean that the University would not be able to enrol you on your chosen course.

Sensitive/special category personal data processed (such as information relating to ethnicity, health and disability) is necessary for reasons of substantial public interest or where there is a legal requirement upon the University to process the data including HESA reporting purposes or where it is necessary for Equal Opportunity Monitoring.

Personal information will be collected by other parts of the University such as by the Sport Centre, Accommodation, Student Support Services and fair processing notices will be provided at the point of collection as required.

Alumni Relations Development Team

Following graduation, personal data is processed by the Alumni Relations Development Team within the University as all individuals graduating automatically become members of the University's Alumni Community.

For alumni at the University of South Wales there are a number of benefits including access to - publications, careers advice, details of further education opportunities, organised reunions, networking events and opportunities to support the University. Additionally, the Alumni Development Team hold the most up to date information on former students including details of communication preferences. At graduation and periodically in the future individuals will be asked by alumni to state their communication preferences.

Having contemplated these factors, it is considered that this processing is necessary for the purposes of the legitimate interests pursued by the controller and that this does not override the rights and freedoms of the individual.

Full details on the use of personal data can find information on the use of data through the Alumni [webpages](#).

Students' Union

The University will share personal data with the Students' Union in order to allow students to participate in the election of its officers and to become a member of the Students' Union. Having contemplated the work of the Students' Union, it is considered that this processing is necessary for the purposes of the legitimate interests pursued by the Students' Union and that this does not override the rights and freedoms of the individual.

What information do we collect about you?

The University collects information about you at various points throughout your student journey. Personal data is collected at the application stage, at enrolment and throughout the period of study to form the student record. Type of personal data processed includes, though is not limited to, the following:

- Contact details and other information submitted during the application and enrolment processes.
- Details of courses, modules, timetables and room bookings, assessment marks and examinations.
- 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 your engagement with the University such as attendance data and use of electronic services such as UniLearn (Blackboard) and UniLife.
- Contact details for next of kin to be used in an emergency.
- Details of those with looked after status or those who have left the care system for the provision of support.
- 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 and the Advice Zones.

- For international students: Copies of passports, visas and any other documents required to ensure compliance with Home Office requirements as well as information collected in relation to attendance.

How will your data be used?

By commencing or enrolling as a student, the University will be required to collect, store, use and otherwise process data about you for any purposes connected with your studies, your health and safety and for other reasons deemed necessary for the performance of your contract with the University. We will also use your data for certain purposes after you cease to be student.

The University will only use your data fairly and lawfully in accordance with our obligations under the current Data Protection Act as well as under the new General Data Protection Regulation. This means that we will process your data in a way which respects the Data Protection Principles and your rights. Any use by the University of your data must also be covered by our current registration with the Information Commissioner. This is available on the [Information Commissioner's Office website](#) and describes in a general way how we process personal data about students and other individuals.

Although it is not possible to state every purpose for which your information will be used, the following are examples of how it is likely to be used while you are a student:

- In order to enrol you on your course and to record your academic achievement (for example – your course choices, examinations and assessments)
- To assist in pastoral and welfare needs (e.g. the counselling service and services to students with disabilities)
- To carry out investigations in accordance with academic and misconduct regulations.
- To operate security, disciplinary, complaint and quality assurance processes.
- To administer the financial aspects of your registration as a student (such as payment of fees and debt collection).
- To provide or offer facilities and services to students (e.g. library access, printing, computing, sports facilities, accommodation and careers support).
- To ensure your health, safety and security on campus.
- To produce management statistics and to conduct research into the effectiveness of our programmes of study as well as produce statistics for statutory purposes.

- In order to provide overseas students with support and advice on a range of issues such as immigration, cultural issues and welfare.
- To monitor engagement of students on Tier 4 Visas to ensure compliance with the terms of their sponsorship.
- To monitor our responsibilities under equal opportunity policies.
- To maximise an individual's opportunities to succeed through the use of learning analytics. The University records behaviour and interactions with the University's systems which are used as an indicator of engagement and progress. This information is then analysed and used to identify a projected outcome and where a student is at risk of withdrawing from their study.

Data provided at enrolment (such as educational attainment prior to study at USW, address, age), information on course progression and information on behaviour and interaction is kept for future analysis and research to aid our understanding of the student population and in learning analytics. Further information is available within the ['Learning Analytics Student Guide'](#).

This processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The University would also like to use information around ethnicity of the student population which would further enrich its datasets and enable the University to improve analysis based on a more individual level in the future. The University will only process this information with the individual's consent.

- The University provides students with a 'smart' photographic identification card. The card can be used to access certain rooms, for security as a means to identify who is permitted on campus, to access the library and to allow access to print services.
- To produce statistics and management information to enable the University to understand its business and for strategic and management decision making.
- For electoral roll purposes. When students have agreed for their data to be shared with Local Authorities for automatic inclusion on the electoral register.
- Upon graduation the names of those graduating are published in the award brochure. Where students do not wish for their names to be included they may inform the Exams, Certification & Graduation Unit of this when they receive their invitation.
- To provide those with identified needs with access to support and University services.

Who receives your data?

Where necessary personal information will be shared internally within the faculties and departments across the University. Personal data is protected by the University and

information will not be disclosed to third parties without consent, or, is permitted by law. This section outlines the major organisations and the most common circumstances in which we disclose data about students. Where this involves international transfer of your data, data will only be transferred if it meets the conditions set down under current data protection legislation.

- **After graduation** the University will need to maintain some records in order that it can verify awards, provide transcripts of marks, to provide academic references and for career support.
- Following graduation, personal data is processed by the **Alumni Relations Development Team** within the University as all individuals graduating automatically become members of the University's Alumni Community.
- The University is an Approved Education Provider for the purposes of the **Points-Based Immigration System**. The University will provide data about students on the Tier 4 Student Visa and other categories of visa to the Home Office and its departments in order to fulfil its duties as a Tier 4 Sponsor Licence holder.
- To sponsors and parents where consent has been provided.
- **HE/FE institutions & placement providers:** Where students are involved in study arrangements with other organisations, eg: exchanges, placements, joint/double programmes, we may disclose some data to the relevant institution, including those outside the European Economic Area (EEA).
- **The Student Loan Company:** Personal data will be shared to confirm enrolment, attendance and identity in order that students can access financial support.
- **Debt recovery / credit control:** Personal data may be shared with third parties, attempting to recover debt on behalf of the University, where internal debt recovery procedures have been unsuccessful.
- **Potential employers** or providers of education whom you have approached.
- **UK agencies** with duties relating to the prevention and detection of crime, collection of a tax or duty or safeguarding national security
- The University has a statutory obligation to release information to the **Higher Education Statistics Agency (HESA)** for statistical analysis. Full details on the uses of student data by HESA can be found at <http://www.hesa.ac.uk/fpn>.
- The University is required to pass data about its students to **the Higher Education Funding Council for Wales (HEFCW)** for them to conduct the National Student Survey. This provides students with the opportunity to give their feedback on their

experiences at the University. Information will also be provided to HEFCW in line with our statutory responsibilities.

- Personal data relating to students on specific programmes will be passed to **professional bodies** which accredit those programmes at the University in connection with registration such as Law Society, General Chiropractic Council, Care Council for Wales. If there has been an incident of academic or professional misconduct and/or where the Head of School or equivalent believes there is a concern related to fitness to practise which may result in a risk to the public, this will also be reported to the appropriate professional body.
- Personal information may be shared with **work placement providers** including contact details, information around the individual's studies and other necessary information.
- Following graduation the University or **HESA** may contact individual students to ask them to complete one or more surveys into the outcomes of higher education and details of activities after graduation. These surveys may be undertaken by the University or by another specialist organisation contracted for that purpose. If a specialist organisation is used that organisation will receive the individual's contact details, but will only use these details to ask individuals to complete the survey, these details will then be deleted. Individuals may also be contacted as part of an audit to check that the University or any contracted organisation have undertaken these surveys properly (full details on the HESA collection notice are available [here](#))
- Coursework and assignments are submitted through **Turnitin® UK**, which supports academic staff in identifying any plagiarism, re-presentation and inappropriate citation. Where plagiarism is suspected, work and information may be shared internally and with other institutions as required.
- Data may be shared with **partner colleges** where the University has partnership arrangements in place. Information that would be shared for purposes relating to their studies and for administrative purposes.
- Personal information may be shared with organisations (including other education providers) with whom we work collaboratively and with other agencies (including the Welsh Government) where there is a requirement on the University to report on outcomes and progression.
- Any other disclosures that the University makes will be in accordance with data protection legislation and your interests will be considered.

How long will your data be held?

Information held on file will be kept in line with our [Records Retention Schedule](#).

Security of your personal information

Data Protection legislation requires the University to keep personal data secure. This means that 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 an individual's data will be authorised to do so. Information held in electronic form will be subject to password and other security restrictions, while paper files will be stored in secure areas with controlled access.

The processing of some data may be undertaken on the University's behalf by an organisation contracted for that purpose. Such organisations will be bound by an obligation to process data in accordance with the Act/Regulations.

Normally personal data that we collect from you will be stored within the European Economic Area ("the EEA"). However, in certain instances personal data will be collected by processors within a country or territory outside the EEA. Where this occurs the University will ensure that the country is recognised by the European Commission as guaranteeing an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data; or, by companies registered with the EU-US Privacy Shield.

Your rights

You have the right to access your personal information, to object to the processing of your personal data, to rectify, to erase, to restrict and to port your personal information if you so wish.

Any requests or objections should be made in writing to the Data Protection Officer – dataprotection@southwales.ac.uk

If you are not satisfied with the University's response, or believe that the University is not processing personal data in accordance with the law then you may complain to the Data Protection Officer.

If the matter is not resolved and 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:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

www.ico.org.uk