

STUDENT PRIVACY NOTICE

Purpose of this Notice

This Notice explains how we will collect and use your personal data.

We are the data controller for personal data that we process about you.

Throughout this Notice, “University” “we”, “our” and “us” refers to the University of Leeds. “you” and “your” refers to those expressing an interest in becoming a student at the University (both prior to and at formal application stage), together with those who later become a registered student at the University.

Change in the law

Until 24 May 2018 we shall process your personal data in accordance with the Data Protection Act 1998 (or DPA for short). From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulations (or GDPR for short).

This Notice complies with requirements under both DPA and GDPR.

Changes to this Notice

Prior to the implementation of GDPR, we are likely to make changes to this Notice. We shall inform you of any changes to this Notice. Notification will be through the appropriate medium of communication e.g. where our main contact with you is by email we will email you.

You can obtain the current version of this Notice from www.leeds.ac.uk/privacynotice.

Anything you are not clear about

If there is anything you are unclear about, please contact our Data Protection Officer, who shall be happy to answer any queries you may have concerning this Notice or the way in which we processes your personal data.

The Data Protection Officer's contact details are provided at the end of this Notice.

Where does the University get your personal data from?

We obtain personal data about you from the following sources:

- from you when you provide your contact details for open day activities or register as a student with us;
- from third party sources (e.g. UCAS, other institutions involved in joint programmes or the Student Loans Company). When we obtain personal data about you from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data.

Categories of personal data being processed

We will collect and process personal data about you for the purposes described below.

Personal data may contain “sensitive personal data” as described under the DPA and “special categories of data” as described under the GDPR. Such “sensitive personal data” or “special categories of data” will include information about your racial or ethnic origin, religious beliefs or other beliefs, physical or mental health or, in relation to DPA only, other conditions and information concerning any criminal offences or criminal proceedings.

When you register with us as a student you can decide if you wish to share with the University certain types of "sensitive personal data" or "special categories of data". The online registration process will provide you with more information.

The purposes for which we process your personal data and the legal basis for that processing

In general terms, we process your personal data for the administration of your position as a student with us, including the use of our services such as, residential services, lecture capture, attendance monitoring, the Library and sports facilities.

We set out in table 1 of this Notice the purposes for which we will process your personal data.

Who might we share your data with?

The University will occasionally share your personal data with third parties. For example it may share some of your data with HESA and other government bodies, or other third parties

involved in the delivery of your course. It also might share your data with accrediting and professional bodies. Please see table 1 for further information on what information we may share with other third parties.

Additional notices and guidance/policies

We also have some additional notices, guidelines and policies with further useful information about the way in which we process your personal data:

- **The University's Data Protection Code of Practice** – this is presently being reviewed and updated ready for compliance with GDPR. It contains a lot of useful general information on data protection and University practices see http://www.leeds.ac.uk/secretariat/data_protection_code_of_practice.html.
- **Attendance monitoring** – we conduct attendance monitoring for a number of reasons including to assist with student visas for international students and ensure the proper engagement of our students. If you are a student, we may require you to participate in electronic recording of attendance for example using our UniLeeds app that you have downloaded on to your mobile phone or other portable device. Please see http://ses.leeds.ac.uk/info/22108/registration_enrolment_and_attendance/789/attendance for further guidance.
- **Lecture capture service** – we regularly record educational activities in which you may be involved. These recordings will be made in accordance with our policy on Audio or Video Recording for Educational Purposes. Please note that under this policy we assume that you generally consent to being recorded, however, there is a right to opt out and request an edit of recordings. Save in agreed exceptional circumstances, we do not permit students to record education activities. Please see http://www.leeds.ac.uk/secretariat/documents/audio_visual_policy.pdf. Please read the Policy to understand your rights and obligations.
- **Our Alumni** – as an integral part of the University's services to its students it provides alumni activities. For more information see <https://alumni.leeds.ac.uk/privacynotice>.
- **Our website** – we use Cookies (that will collect your personal data) on our web pages. Please see our policy on the use of Cookies at http://www.leeds.ac.uk/info/5000/about/237/privacy_notice.
- **HESA returns** – we are required to return important information (that will include your personal data) to HESA. Please see HESA's collection notice together with other

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

Automated individual decision making, including profiling

This is where we may make decisions automatically about you without human intervention. With regard to University Alumni activity please see <https://alumni.leeds.ac.uk/privacynotice>. We use your personal data to conduct other automated individual decision making and profiling as described in table 1. Table 1 also provides where you can go to find out further information on the logic behind our decisions as well as the significance and consequences of our decisions. If you are still finding it difficult to locate or understand this information please contact the Data Protection Officer who will help you further.

Unwanted communication

We will from time to time communicate with you by email, post and telephone.

If, at any stage, you are concerned about the content of these communications, e.g. unwanted marketing information, or wish to change the method of communication that we use please unsubscribe to general email communications.

If you are unsuccessful in unsubscribing from our communications and/or remain concerned, please contact our Data Protection Officer.

Transfers to third party countries

Sometimes to achieve the purposes for which we are processing your personal data we may need to share your personal data with other organisations based within the European Union or if outside the European Union based in countries that have comparable levels of protection.

When it is necessary to share your data with organisations outside of the European Union, we will ensure that there are appropriate safeguards in place.

Retention periods

Table 2 describes the University's published guidelines for retention of student data.

Your rights as a data subject

We thought it would be helpful to set out your rights under GDPR. You have the right to:

- withdraw consent where that is the legal basis of our processing;
- access your personal data that we process;
- rectify inaccuracies in personal data that we hold about you;
- be forgotten, that is your details to be removed from systems that we use to process your personal data;
- restrict the processing in certain ways;
- obtain a copy of your data in a commonly used electronic form; and
- object certain processing of your personal data by us.

Please see <https://ico.org.uk/> for further information on the above rights. You may also contact the Data Protection Officer for further information.

You have a right to complain to the Information Commissioner's Office about the way in which we process your personal data. Please see <https://ico.org.uk/>.

Legal basis for processing your data under GDPR

GDPR is new law and it has not yet been applied to circumstances similar in context to our relationship with students. The extent of lawful grounds for processing data has yet to be fully understood. Table 1 gives the University's present view on the grounds for processing against each specified purpose. As legal views mature the University may change its views on its legal basis for processing.

Here is a brief explanation of the grounds referred to under table 1.

(Article 6(1)(a)), Consent – on specific occasions the University will only process certain data if you consent e.g. on registration you only need to provide certain “special categories” of data if you agree that that.

(Article 6 (1)(b)), necessary for the performance of your student contract – on many occasions the University will process your data to enable it to meet its commitments to you e.g. those relating to teaching and assessment.

(Article 6 (1)(c)), necessary to comply with a legal obligation – the University does have legal obligations to provide your personal data to others e.g. HESA.

(Article 6 (1)(d)), for the purpose of protecting the vital interest of yourself or another – sometimes in extreme circumstances the University will have to release information to protect your interests or the interests of others e.g. in medical emergencies.

(Article 6 (1)(e)), processing necessary for the performance of a task carried in the public interest – the University is an educational establishment and in particular its educational activity is conducted in a public interest (including your interest and the interest of others).

(Article 6 (1)(f)), processing is necessary for the purposes of the legitimate interest of the University or a third party subject to overridden interests of the data subject – the University (and sometimes third parties) has a broad legitimate interest in activities that connect to the activities and education of students. Subject to those interests not being overridden by the interests of fundamental rights and freedoms of students, it will pursue those interests. A good example of this legitimate interest would be its Alumni activities. Where Article 6(1)(f) is used the “legitimate interest” is generally the interest of the University (or third party) in providing or supporting the provision of higher education to its students.

(Article 22(2)(a)), automated decision making necessary for performance of a contract – the University will sometimes automate decisions relating to its services it is providing to you.

(Article 9(1)(a)), processing “special categories” of data where you have given consent – the University will process certain sensitive information about you with your consent.

(Article 9(1)(g)), processing “special categories” of data where necessary for reasons of substantial public interest.

(Article 9(1)(f)), processing “special categories” of data in connection with legal claims.

It is recognised that some of the above grounds will overlap and that the University could rely on multiple grounds justifying its lawful processing. The University also reserves the right to rely upon other grounds that are not referred to under table 1.

Concerns and contact details

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to this Notice, please contact our Data Protection Officer, Adrian Slater at a.j.slater@adm.leeds.ac.uk.

Our general postal address is University of Leeds, Leeds LS2 9JT, UK.

Our postal address for data protection issues is University of Leeds, Room 11.72 EC Stoner Building, Leeds, LS2 9JT.

Our telephone number is +44 (0)113 2431751.

Our data controller registration number provided by the Information Commissioner's Office is Z553814X.

TABLE 1		
No.	Specific Purposes	Legal Basis – reference to Article 6 GDPR unless indicated to the contrary
1.	Admission, registration and administration of their studies.	(1)(b) or (1)(f)
2.	Academic assessment and progression.	(1)(b) or (1)(f)
3.	Administration of student related policies and procedures including appeals, complaints, grievances, disciplinary matters, and matters relating to health and conduct and to cheating and plagiarism	(1)(b) or (1)(f)
4.	Pursuit of social and sporting activities e.g. relating to use of the University's sports facilities.	(1)(b) or (1)(f)
5.	The provision of University accommodation and other support services such as those of the Library, ISS and the Careers Centre.	(1)(b) or (1)(f)
6.	The granting of awards (including the publication of awards and marks and inclusion in pass lists made available via the University's web site).	(1)(b) or (1)(f)
7.	Processing and recovery of accounts and fees.	(1)(b) or (1)(f)
8.	Research and statistical analysis.	(1)(b) or (1)(f)
9.	Production of statistical returns required for third party government bodies e.g. the Higher Education Statistics Agency, for completion of government supported surveys e.g. the National Student Survey, the Destination of Leavers in Education Survey and the Teaching Excellence Framework.	(1)(c) or (1)(e) or (1)(f)
10.	Creation of e-mail addresses, available to those within and outside of the University. (Please note that it is possible for those accessing such addresses to obtain such information as a	(1)(b) or (1)(f)

	student's home department/resource centre and indeed whether an individual is or has been enrolled at the University).	
11.	Direct mailing of or about (i) student benefits and opportunities offered by or through the University and (ii) University activities and events organised for students.	(1)(b) or (1)(f)
12.	Host mailing of services or career opportunities of direct relevance to student interests.	(1)(b) or (1)(f)
13.	Administration of employment contracts where the student is employed by the University.	(1)(b) or (1)(f)
14.	Administration of Alumni membership.	(1)(b) or (1)(f)
15.	Consideration and granting of prizes, scholarships and bursaries: of discretionary funding available to students; and of other such awards.	(1)(b) or (1)(f)
16.	In relation to the safety of individuals and their property and the protection of University assets, including the use of CCTV.	(1)(b) or (1)(f)
17.	The production of student identification cards; and the inclusion of photographic images on the University's computerised student record system.	(1)(b) or (1)(f)
18.	The operation of a lecture capture facility relating to the recording of educational activities e.g. lectures, by the University.	(1)(b) or (1)(e) or (1)(f)
19.	Automated individual decision making with regard to assessment of fees status and suitability for further financial assistance to be provided to students such as bursaries. For further information regarding decision making in those areas please see http://students.leeds.ac.uk/#Finance	Article 22(2)(a)
	Personal data released to third parties for the following purposes.	
20.	To the Higher Education Statistics Agency, HEFCE, government departments, the West Yorkshire Workforce Development Confederation and other authorised users for the completion of student surveys and analysis of student statistics and/or to enable them to carry out their	(1)(e) or (1)(f)

	statutory functions as applicable. ¹	
21.	To local authorities for the purpose of enrolment on the electoral register and automatically exempting student from payment of council taxes.	(1)(b) or (1)(f)
22.	To the British Council for the administration of pre-arrival events.	(1)(b) or (1)(f)
23.	To The Leeds University Students' Union – in accordance with options given on registration.	(1)(a) or (1)(f)
24.	To professional and industrial bodies wishing to communicate with students about career opportunities and membership of their body	(1)(b) or (1)(f)
25.	To Junior Common Rooms and other student societies for the pursuance of student activities with those bodies.	(1)(b) or (1)(f)
26.	To the police or other regulatory body where pursuant to the investigation or disclosure of a potential crime.	(1)(f)
27.	To close family and the emergency services where there is an emergency situation e.g. illness, serious injury or bereavement.	(1)(f)
28.	To external examiners for the purposes of assessment.	(1)(b) or (1)(f)
29.	To governmental and regulatory bodies for the purpose of gathering census or other information including the assessment of fees, including electoral registration officers.	(1)(b) or (1)(c)
30.	To the Home Office and other international and national governmental and regulatory bodies in connection with the assessment of students status.	(1)(b) or (1)(c)
31.	To third parties accessing information about student awards - ranged by department - which is available in the public domain; and for the verification of awards to employers and other educational institutions.	(1)(b) or (1)(e)

¹ In the case of HESA, this may include releasing telephone numbers so that HESA or its agents can make telephone calls in relation to the auditing of First Destination Surveys of graduates.

32.	To other educational institutions involved in the delivery of a student's course or programme, e.g. affiliated colleges, exchange institutions, including those outside of the UK and sometimes the EEA; and to other organisations in relation to work placements.	(1)(b) or (1)(f)
33.	To professional bodies where registration with that body is related to or a requirement of the student's studies e.g. the GMC for medical students.	(1)(b) or (1)(e) or (1)(f)
34.	To the University's Alumni branch offices/representatives within and outside of the UK for dissemination of information in connection with activities and events for former students.	(1)(b) or (1)(f)
35.	To any third party accessing the University's e-mail directory of student e-mail addresses.	(1)(b) or (1)(f)
36.	To any third party wishing to access a catalogue within the University's library containing reference to student work.	(1)(e) or (1)(f)
37.	To banks (and other payment agencies you may use), family, sponsors or other third parties to enable them to pay student debts.	(1)(b) or (1)(f)
38.	To external agents of the University in relation to the repayment of student debts.	(1)(f)
39.	To external agencies - which may be based outside the European Economic Area - in connection with procedures for guarding against plagiarism.	(1)(e) or (1)(f)
40.	To Data Processors in order for them to process data on behalf of the University for any of the purposes for which the University is permitted to process the data, including the provision of academic and other services by the University.	(1)(b) or (1)(f)
41.	In relation to the provision of references for students or former students.	(1)(f)
42.	To sponsors, including the UK research councils, the Student Loan Company and sponsors located overseas.	(1)(b) or (1)(f)
43.	To external bodies and individuals who have funded student prizes and awards.	(1)(b) or (1)(f)
	All students agree to the University processing their "sensitive personal data"/"special categories	

	of data” for the following purposes and for release to the following third parties:	
44.	To the Higher Education Statistics Agency, HEFCE, government departments and other authorised users for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable.	Article 9(1)(a)
45.	To professional bodies where registration with that body is related to or a requirement of the student’s studies e.g. the GMC for medical students.	Article 9(1)(g)
46.	To other bodies involved in the delivery of the course or programme e.g. affiliated colleges, for the purpose of statistical analysis and programme administration.	Article 9(1)(a)
47.	For the assessment and provision of services to disabled students.	Article 9(1)(a)
48.	For admission to and the administration of student programmes.	Article 9(1)(a)
49.	Where required, to the police or other agencies in connection with particular programmes of study or prior to certain placements.	Article 9(1)(a) or (g)
50.	To the University’s external lawyers, insurers in respect of accidents occurring within the institution and external auditors.	Article 9(1)(f)

Table 2

CATEGORY	SHORT DESCRIPTION	MINIMUM PERIOD	MAXIMUM PERIOD
Recruitment data	Expressions of interest in courses and open day information		6 months after cessation of relationship
Application data	Application forms, interview information		6 months after cessation of relationship (unsuccessful applicants only) 6 years after student leaves (successful applicants))
DBS disclosure	Information relating to criminal records		6 months after checking
Core academic data	Transcript like information and basic verification information relating to the individual	Perpetuity	Perpetuity
Financial data	Information relating to student debt and student payments	6 years after student leaves	6 years after student leaves
Reference data in addition to core academic data.	Contents of student file e.g. attendance date, e-mails etc	1 year after student leaves	6 years after student leaves
Audit/professional/statutory data	Health and safety records, verification data required by professional body or HEFCE audit	As required	As required
Appeals and complaints/anticipated or ongoing legal action	Academic and disciplinary appeals, student complaints and litigation	1 year after student leaves for all students	For Cases: 6 years after exhaustion of internal process or after the student leaves.

Course information	Programme and Module specifications	Perpetuity	Perpetuity
Quality Assurance	Student surveys, module reviews, programme reviews, minutes of meetings, Exam papers etc	Current academic year plus 1	None unless individuals are identified
Student assessments and evidence submitted for mitigation, disability notification.	Assessments, exam scripts, and any item that identifies the student e.g. mitigating circumstances minutes, exam board minutes	1 year after student leaves	6 years after student leaves
Learning resources that identify students		Current academic year plus 1	
Learning resources that don't identify students	Lecture slides, recordings and hand-outs	In accordance with systems policy, based on available space and system performance	In accordance with systems policy, based on available space and system performance

