

# LEEDS BECKETT UNIVERSITY STUDENT PRIVACY NOTICE

## INTRODUCTION

This Notice is relevant to Leeds Beckett University Students. Students' will include intending, registered, absent/temporarily withdrawn and former students of our University. "You" and "your" refers to those expressing an interest in becoming a student at Leeds Beckett University (both prior to and at formal application stage), together with those who later become a registered and enrolled student at the University.

Throughout this Notice, "the University", "we", "our", and "us" refers to Leeds Beckett University. As we hold information in a form that identifies individuals, it is "personal data" and this Notice sets out the rights and freedoms of students as "data subjects" under data protection requirements and explains how Leeds Beckett University will collect and use student personal data as a Data Controller. This means the University is able to determine the purposes and means of the processing of personal data, as outlined in this Notice.

Data protection laws require us to be transparent about how we process your personal data, and they set out legal requirements to give you specific information as data subjects. The purpose of this Notice is to enable you to understand the scope of the personal data which the University collects, holds and uses that relates to you personally as a student, and how this personal data will be handled by us. It covers use of your personal data within the University and the circumstances in which we will share your personal data with other organisations.

## QUESTIONS

We have tried to make this Notice as clear as possible to ensure you are fully informed of the use of your personal data and provide useful signposting so that you can find the information most relevant to you. For further information please visit the [Data Protection](#) page on our website and if you have any specific queries in relation to how your data is handled or the content of this Notice, please contact the Information Compliance Team email: [infocompliance@leedsbeckett.ac.uk](mailto:infocompliance@leedsbeckett.ac.uk) . Leeds Beckett University's Data Protection Officer ('DPO') has oversight of data protection matters within the University and you can contact the DPO email: [dpo@leedsbeckett.ac.uk](mailto:dpo@leedsbeckett.ac.uk) Telephone: 0113 812 7542  
Address: Leeds Beckett University, 107 Old Broadcasting House, City Campus, Leeds LS2 9EN

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## 1. What is Data Protection?

**1.1** Personal data is information relating to identifiable living individuals (known as “data subjects”). Use of personal data (including collecting data, sharing data or just holding it in files) is referred to as “data processing”.

In order to protect your privacy, organisations do not have complete freedom in how they use your personal data. They have to comply with privacy and data protection laws, which apply restrictions on when and how personal data can be processed.

The key pieces of privacy legislation are the General Data Protection Regulation 2016 (‘GDPR’) and the Data Protection Act 2018 (‘DPA’) that sets out a key principle of ‘accountability’ over the following data protection principles:

- lawfulness, fairness and transparency
- purpose limitation
- data minimisation
- accuracy
- storage limitation
- integrity and confidentiality

**1.2** Under these laws Leeds Beckett University is a Data Controller in relation to the personal data that we collect from you which we process so that we’re able to provide courses and services to you. This means that the University has the legal responsibility to safeguard your personal data and ensure it is processed lawfully. The purpose of these data protection requirements is to ensure that we have adequate safeguards in place to protect your personal data and that we use it appropriately.

Our University will make sure that the personal data we hold about you is:

- collected only for the specific purposes that we tell you about;
- adequate, relevant and limited to the purposes intended;
- kept secure at all times;
- is accurate and, where necessary, kept up to date (to the extent that you help us achieve this please see [Leeds Beckett University Student Contract](#) for details of what is required of you);
- used only for the purposes allowed by law;
- kept only for as long as is necessary;
- not transferred outside the European Economic Area (EEA) unless a legally recognised safeguard providing an adequate level of protection of your rights and freedoms is in place.

**1.3** The University is committed to protecting your personal data and your privacy rights when you entrust us with your personal data. The University’s Information Governance Framework and supporting policies, such as its Data Protection Policy, outlines this commitment. The framework sets out how it aims to meet the key accountability principle to how to ensure information governance and compliance safeguards are put in place.

## 2. What are your rights as a data subject?

**2.1** Under the data protection laws, you have a number of data subject rights and freedoms in relation to our processing of your personal data. These are the right to:

- request information about how your personal data are processed, and to request a copy of that personal data;
- receive your personal information in your preferred format;
- request that any inaccuracies in your personal data are rectified without delay;
- request that any incomplete personal data are completed, including by means of a supplementary statement;
- that your personal data is erased if there is no longer a justification for it to be processed;
- object to the processing of your personal data where it is processed for direct marketing purposes;
- object to automated decision making, including profiling
- object to processing where we believe we have a legitimate interest or are required to perform a public task
- request that the processing of your personal data is restricted (in certain circumstances for example where accuracy is contested)

**2.2** If you would like to exercise any of your rights as outlined above, you can contact the Information Compliance Team Email: [infocompliance@leedsbeckett.ac.uk](mailto:infocompliance@leedsbeckett.ac.uk) or DPO Email: [dpo@leedsbeckett.ac.uk](mailto:dpo@leedsbeckett.ac.uk) or visit the [Data Protection](#) page on our website.

Once you contact us, we will aim to respond clearly and fully to any concerns you have raised with us about our processing and any requests you have made to exercise your rights as set out above. However, as a data subject, if you still have concerns about our data processing or consider that we have failed to comply with your request and the data protection legislation, then you have the right to lodge a complaint with the data protection regulator, the Information Commissioner:

Online reporting: <https://ico.org.uk/concerns/>

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Tel: 0303 123 1113

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

### **3. When and how do we collect your personal data?**

**3.1** The University needs to collect your personal data to operate as a provider of higher education and/or to fulfil our [Leeds Beckett University Student Contract](#) with you and/or because we have a legal obligation to meet. The information you provide will be used by the University for its provision of its educational services to you and the administration of your position as a student with us, including the use of services such as residential services, lecture capture, attendance and engagement monitoring, pastoral support, library and sports facilities.

#### **3.2 We obtain personal data about you from the following sources:**

- from you, when you express an interest in becoming a student, provide your contact details for open day activities, both prior to and at formal application stage, when registering or enrolling as a student with us or during your studies and subsequently through the work you undertake on your course and all your contacts and engagements with university staff and service providers.
- collected from or via the Universities and Colleges Admissions Service ('UCAS'): the information which you provided in your UCAS application and other information generated through the UCAS admissions cycle.
- from other third party sources such as institutions involved in collaborative programmes with the University, organisations providing financing or funding such as the Student Loans Company or any organisations or companies providing you with individual sponsorship or other financial support, agents representing you in the admissions process and organisations which provide work placements and (where relevant) UK Visa and Immigration.
- generated by University academic and professional services staff or service providers in the course of delivering and administering your course and your contract with the University or providing additional services to you in connection with your status as a University student.

### **4. What are the types of personal data we may hold about you?**

#### **4.1 Contact, identification and personal characteristics**

- Your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number), your passport number or national identity card details (where relevant), country of domicile, your nationality and details regarding your emergency contact/next of kin. We will also allocate you a unique student number;
- Data about your personal characteristics (known as special category data including gender, ethnicity, disability (this information is also kept for reasonable adjustments and other services to enhance your student experience), sexual orientation, religion) for the purposes of statistical analysis for equal opportunity monitoring and regulatory reporting.

## **4.2 Education history and employment**

- Data relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results.
- Data about any employment placements or work you undertake as part of your course at the University, including your attendance and performance on the placement and any work undertaken as a student ambassador.

## **4.3 Academic interests, progression and performance**

- Throughout your course we will be creating and retaining records relating to your academic attendance, progression and performance. This will include your submitted assignments and examination papers, assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- We will keep data you provide to us or received from third parties about your family or personal circumstances (including health conditions or disabilities), and both academic and extracurricular interests, for example where this is relevant to any consideration of mitigating circumstances in connection with your academic performance, additional learning support, pastoral care or other wellbeing support;
- We need to process information about you when carrying out the administration of University policies, regulations, procedures and codes of practice that apply to students such as an academic appeal, fitness to study, plagiarism detection and activities related to academic integrity, grievances, complaint or disciplinary process;
- We will keep financial information you provide for the purposes of assessment for financial support, managing payment of fees and recovery of debt.
- Where you need a visa to study in the UK, we will need to process information about your immigration status in order to fulfil our responsibilities as a visa sponsor under immigration legislation;
- We need to process information about you to provide you with a University card as a method of identifying you and so that we can provide you with access to our services and facilities, to support your studies and engagement, to compile statistics and help maintain our information systems;
- We need to process information about you to enable the use of on-line tools in Virtual Learning Environments (VLEs) that allow you to access on-line materials and tools for your course or the use of video conferencing applications such as Microsoft Teams.

## 5. What are the legal bases for processing your personal data?

**5.1** In order to process your personal data, the University will need a legal basis to do so, these are explained below with the relevant GDPR articles in brackets. In order to process special category data, as this is considered as more sensitive data the University requires two legal bases to process this special category data.

### **5.2 Personal Data**

Personal data relates to information that identifies you such as your name, address, date of birth, and other contact details such as your email address and telephone number.

#### **Conditions of processing any personal data**

- On specific occasions the University will only process certain personal data if you **consent**, e.g. on registration there are certain special categories of data that you only need to provide if you agree to their collection. You are able to withdraw your consent at any time. When you are asked for consent, you will also be given details of who to contact to withdraw your consent. [Art 6.1(a)]
- Necessary for the **performance of your student contract** – on many occasions the University will process your personal data to enable it to meet its commitments to you for the delivery of your course, e.g. those relating to teaching and assessment which may include some automated decision making necessary for the performance of the contract. [Art 6.1(b)]
- Necessary to comply with a **legal obligation** – the University has legal obligations to provide your personal data to others and we will identify the relevant obligation, e.g. the Higher Education Statistics Agency (HESA) or UK Visas and Immigration. [Art 6.1(c)]
- 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. [Art 6.1(d)]
- Processing necessary for the **performance of a task carried in the public interest** – the University is an educational establishment and in particular its higher educational and research activity is conducted in a public interest (including your interest and the interest of others). This may also refer to a public interest task pursued by another organisation. [Art 6.1(e)]
- Processing is necessary for the purposes of the **legitimate interest** of the University or a third-party, subject to the overriding interests of the data subject – the University (and sometimes third parties) has a broad legitimate interest in activities that connect to the education of students. Subject to those legitimate interests not being overridden by the interests of students' fundamental rights and freedoms, it will pursue those interests. A good example of this legitimate interest would be the University's Alumni activities. Where "legitimate interest" is used it is generally in the interest of the University (or third party) in providing or supporting the provision of higher education to its students. [Art 6.1(f)]

### 5.3 Special category personal data

Special category data is personal data, which is more sensitive and this data would include anything that reveals your racial or ethnic origin, political opinions, religious or similar beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning disabilities or health or data concerning a natural person's sex life or sexual orientation and information about criminal convictions.

We may use information concerning your health and medical conditions (e.g. disability or dietary needs) or information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation, which is used for equal opportunities monitoring and other statistical purposes.

#### Conditions of processing any special category personal data

- **Explicit consent:** this means that you have explicitly agreed that we can use your personal data for this specific purpose. You are able to withdraw your consent at any time. When you are asked for consent, you will also be given details of who to contact to withdraw your consent. [Art 9.2(a)]
- Necessary for **purposes of carrying out obligations** and exercising rights in relation to employment, social security and social protection law [Art 9.2(b)]
- Necessary to **protect the vital interests** of you as the data subject or another person, where you are physically or legally incapable of giving consent [Art 9.2(c)]
- Necessary for **establishment, exercise or defence of legal claims** [Art 9.2(f)]
- Necessary for the purposes of **substantial public interest**. Where this applies, we will identify the relevant public interest. [Art 9.2(g)]
- Necessary for **healthcare purposes**, including assessment of working capacity, medical diagnosis, provision of treatment or the management of healthcare arrangements. This only applies where the processing is the responsibility of a healthcare professional who is subject to professional obligations of confidentiality [Art 9.2(h)]
- Necessary for **research or statistical purposes**, where it is considered that that the use of your data will be proportionate to the aims of the research and that your interests as a data subject will be appropriately safeguarded [Art 9.2(j)]

### 5.4 Criminal Convictions Data

We may hold and process data about certain criminal offences and convictions if you have disclosed this as part of the admissions process, or by completing the yearly online registration or where a Disclosure & Barring Service (DBS) check is needed for your programme, where this is relevant to admissions decisions or risk management arrangements. We will use this information to:

- consider your suitability to become a member of the University or to continue to be a member of the University or to decide if any support or measures need to be put in place;
- comply with regulatory requirements to decide your suitability to study on a regulated programme or to practise in a regulated profession;
- ensure that we adequately assess any risk posed to the wider University community.

#### **Conditions of processing any criminal conviction data**

- We can only process information about any criminal convictions you may have where this is in the substantial public interest and falls within a relevant description of processing set out in Schedule 1 of DPA [6.1(e), Section 10 and 18 of GDPR].

Personal data relating to criminal offences and convictions will be retained confidentially and securely and access to that data will be strictly controlled.

## **6. How do we hold your personal data?**

**6.1** The University uses an electronic student record system (currently a system called Banner) to host core student records. There is an individual Banner account for each student in relation to a university course which they are undertaking. The information held within Banner includes contact and registration information; location data; information you provided when applying to the University; information about your course of study and your academic performance and progress and other aspects of your contract with the University.

**6.2** The same types of information which are held within Banner may also be separately held, to some extent, in electronic and/or hard copy by the School in which you are studying. Information about complaints and academic appeals may be held centrally as well as in School records.

**6.3** We use a number of other electronic record-keeping and communications systems for management and delivery of specific University services such as Student Services, Wellbeing, Disability Advice, Student Money Advice, Student and Graduate Futures Service and Library and Learning. These will include the use of systems such as: Student Welcome System, MyHub, MyBeckett, Tableau, Simitive, Symphony, Blackboard, Pebblepad, Turnitin, Student Engagement and Monitoring System ('SEMS'), MyProgress, Maximiser and Eventbrite. The University also uses a closed-circuit television (CCTV) system to protect students, employees and university premises.

**6.4** Your personal data will also be held in electronic and/or hard copies within files and email folders in individual University administration departments. This includes information held by our Financial Services on a system called Agresso and Academic Quality departments in relation to their administration of your course and the associated financial arrangements. It will also include any information generated through your decision to access additional services provided by or through the University, such as accommodation services on a system called StarRez and additional learning support.



**6.5** The University is made up of many services who collect, process and store your personal data in a variety of systems and sub-systems to deliver their services and to support you as a student. These local systems are part of the corporately supported IT architecture which maintains a live service as well as copies of the live systems used for software development and testing. These development and testing systems will also contain your personal data and respect the University's data retention periods.

**6.6** Your usage of IT services will be recorded in usage logs and audit trails as part of the normal operation of the services. This information may be used to support your usage of systems, investigate information security or data integrity incidents, or provide evidence in disciplinary procedures and compliance with University policies. The data may also be used to understand usage and performance of IT systems. It is in the legitimate interest of the University to use your data in this way to ensure that the services you interact with are secure and provide the best student experience possible.

**6.7** University staff will only access information in these systems where this is required for the purposes of their role within the University, to fulfil our contract with you or to comply with other legitimate bases.

**6.8** The University uses third parties which undertake on our University's behalf the provision of learning and information services and IT support (such as Microsoft 365, Microsoft Teams and email via Microsoft, Google for the provision of the Google Apps service and Blackboard for the hosting of the MyBeckett platform). While your personal data needs to be used by third parties to deliver these services the University retains control of your personal data as part of these arrangements, and the third parties will not be allowed to use your personal data for any other purpose.

## **7. Who do we share your personal data with?**

**7.1** Our University will share your information for service activities in order to fulfil our obligations to you under the student contract, and with third parties where we have a legal obligation to do so as a University such as:

- Organisations and institutions that enable the delivery of your course or programme of study such as external examiners for the purposes of your assessment, professional bodies (such as General Medical Council or the Law Society) where registration with them is related to, or a requirement of, your studies;
- Home Office, government, regulatory bodies and their respective agents and other institutions including the assessment of your fees payable, the assessment of your student status, whether you have been reported on earlier [Higher Education Statistics Agency](#) (HESA) or individualised learner (ILR) returns of other institutions, for confirmation and verification of your qualifications, with the police or other agencies (where required) in connection with particular programmes of study or before certain placements;
- Medical practitioners or other individuals cited by you in support of extenuating circumstances claims as part of the academic assessment process;

- [HESA](#) , funding bodies such as, [Education & Skills Funding Agency \(ESFA\)](#), [Quality Assurance Agency](#), [Health Education England](#) (HEE), government departments or their agencies such as [Office for Students](#) (OfS) and other authorised users (including academic researchers, commercial organisations and survey contractors) for the analysis and publication of student statistics and/or to enable them to carry out their statutory or contractual functions as applicable, including those connected with funding higher education;
- [Office of the Independent Adjudicator for Higher Education](#) (OIA) in cases of a complaint against our University;
- Department for Education [Disabled Students Allowances](#) Quality Assurance Group (DSA QAG) for audit purposes;
- Local authorities for the purpose of electoral registration in accordance with the requirements of the Higher Education & Research Act 2017 including the use of the JISC Voter Registration Service and assessment of eligibility for Council Tax exemption;
- Occupational Health services for the assessment of fitness to study and/or attend placement and approved suppliers for the assessment and/or support of disabilities;
- Emergency contact provided by you and the emergency services where there is an emergency situation such as illness, serious injury to the student or bereavement;
- Police or other regulatory bodies (such as Disclosure & Barring Service, Benefits or Tax Inspectors) in connection with national security, the disclosure or investigation of a suspected/ reported crime or the verification of identity;
- University legal advisers and insurers for handling legal, regulatory and insurance cases, if and when they arise;
- Third parties that will undertake services on behalf of the University such as plagiarism detection, debt collection and technical support in the provision of our University's student card services;
- Affiliated organisations for the purpose of gathering census or other information, statistical analysis, assessment, administration and award;
- Market research organisations for the purpose of conducting the National Student Survey.

Where we share your personal data with these third parties whom will have their own Privacy Notices, it will be limited only to that information which is necessary for the identified purpose and set out in government validation guidance.

## **7.2 Leeds Beckett Student Union**

Our University considers that the [Leeds Beckett Student Union](#) plays an important role in your student life. Your enrolment with our University will automatically enrol you with the Leeds Beckett University Students' Union so that they can administer union membership and membership rights and they will contact you to:

- give you important information about eligibility for membership and voting rights regarding Leeds Beckett University Students' Union elections, societies and events, wellbeing and advisory services and information relating to study or career opportunities;  
and/or
- ask for your preferences regarding their direct marketing activities and obtain your agreement to this (it is entirely optional as to whether you agree to such direct marketing).

Please email: [su-reception@leedsbeckett.ac.uk](mailto:su-reception@leedsbeckett.ac.uk) for details of what to do if you do not wish to remain a member of the Leeds Beckett University Students' Union.

### **7.3 Development**

Our University has a broad legitimate interest in activities that connect to the education of students and will send non-marketing communications to students about benefits, services and activities within the University community to Leeds Beckett student email addresses.

This may include information to support you in developing your employability, academic and transferable skills and to enable you to access careers and skills services whilst a student and a graduate and consider this information to also be in your legitimate interests.

### **7.4 Loyalty Card Reward Schemes**

The University uses third parties in connection with the operation of various loyalty card reward schemes that you may wish to become members of. You can choose to opt out of these however, if you opt out, our University will be unable to provide you with these services.

### **7.6 Leeds Beckett Alumni**

We will consider you a lifelong member of Leeds Beckett University's Alumni and keep in touch with you from time to time about our work and areas you may be interested in as a key stakeholder in our University community. As well as keeping you up to date with university news, we'll also use your personal data to contact you with details of services and benefits that are available to you and to let you know about alumni events and fundraising activities.

For more details about how we use your personal data for our alumni relations activities, please see the [Alumni Privacy Notice](#) and if you do not wish your personal data to be used in any of these ways, or you have questions let us know by contacting [alumni@leedsbeckett.ac.uk](mailto:alumni@leedsbeckett.ac.uk)

If you want to exercise your opt-out rights in connection with any of the above please notify the Information Compliance Team Email: [infocompliance@leedsbeckett.ac.uk](mailto:infocompliance@leedsbeckett.ac.uk)

## **8. How long do we keep your personal data for?**

**8.1** Your personal data will be retained in accordance with the retention periods set out in the University's [Records Retention Schedule](#) .

**Updated July 2020**