



# HARTPURY

## Hartpury General Privacy Notice

### About this document

This privacy notice explains how Hartpury University and Hartpury College ("Hartpury", "we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective students of or users of services provided by Hartpury ("you", "your").

Hartpury University and Hartpury College is the data controller of your personal data ICO Registration number: Z1591909 and is subject to the Data Protection Act 2018 ("DPA") and, the General Data Protection Regulation (the "GDPR").

### How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your interest in studying at Hartpury
- when you apply to study at Hartpury directly or via the Universities and Colleges Admissions Service (UCAS), when you complete the enrolment process and when you complete other admissions processes and procedures
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns
- in various other ways as you interact with us during your time as a student of Hartpury, for the various purposes set out below
- from third parties, for example from your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies
- from interactions you have with us or third parties with whom we work to deliver commercial and other activities, such as sporting events

## **The types of information we collect**

We only collect personal data about you that is relevant and consistent with the interaction you have with Hartpury. Depending on your relationship with us, we may collect some of the following types of personal data about you:

- 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) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number.
- information relating to your education and employment history, the school(s), FE and sixth form college(s), universities or other education providers you have attended and places where you have worked, the courses you have completed, dates of study and examination results. We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record.
- information about your family or personal circumstances, for example where this is relevant to the assessment of your suitability to receive a bursary or in order to provide you with appropriate pastoral care.
- Information about academic and extracurricular achievements and interests, for example a personal statement to assess your suitability to study on a course.
- Information about your study and/or living support needs in order to provide you with the appropriate learning and/or living environment.
- sensitive personal data and information about criminal convictions and offences, including:
  - information concerning your health and medical conditions (e.g. disability and dietary needs).
  - certain criminal convictions; and
  - information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.
- CCTV whilst on campus, photographs and video footage during teaching, events or other activities.

## **How we use information about our students**

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

- recruitment and admissions.
- academic matters, including:
  - the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification, prize day, graduation).
  - maintaining student records.

- assessing your eligibility for bursaries and scholarships, etc.
- providing library, IT and information services.
- non-academic matters in support of our core services, including:
  - providing student support services (e.g. through Disability and Additional Learning Support, Innovation Careers and Employability Service, Health and Wellbeing Service, Student Medical Centre, sports injury, personal supervisors and academic departments).
  - monitoring equal opportunities.
  - safeguarding and promoting the welfare of students.
  - ensuring students' safety and security.
  - managing student accommodation.
  - managing the use of social media.
  - managing car parking on campus.
- administering finance (e.g. fees, scholarships and bursaries).
- other administrative purposes, including:
  - carrying out research and statistical analysis.
  - carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations).
  - providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice).
  - promoting our services (e.g. providing information about summer schools, student exchanges, or other events, including commercial events happening on and off campus).
  - preventing and detecting crime.
  - dealing with grievances and disciplinary actions.
  - dealing with complaints and enquiries.

### **Prize Day, Graduation and degree information**

Personal data (including award and classification) will be published in the awards ceremony booklet. This information will also be passed to third parties involved in the ceremonies (which may include our local paper and any commemorative clothing suppliers). You may withhold your consent to your name being used for these purposes when you register online to attend the award ceremony or graduate in absentia. All award ceremonies are broadcast online and will be available to view online afterwards.

## **The basis for processing your information and how we use it**

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you are enrolled as a student, as part of the admissions process (e.g. to send you a prospectus, answer enquiries about our courses or assess your suitability for course).
- once you have enrolled, to provide you with the services as set out in our Terms and Conditions.
- to deal with any concerns or feedback you may have.
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

- to provide you with educational services which may not be set out in our Student Agreement, but which are nevertheless a part of our academic and educational mission.
- to monitor and evaluate the performance and effectiveness of the university or college, including by training our staff or monitoring their performance.
- to maintain and improve the academic, corporate, financial, estate and human resource management of the university.
- to promote equality and diversity throughout the university and college.
- to seek advice on our rights and obligations, such as where we require our own legal advice.
- recovering money you owe to us;
- for fundraising purposes.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements.
- for the prevention and detection of crime.
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional).
- it is necessary to protect your or another person's vital interests; or

- we have your specific or, where necessary, explicit consent to do so.

## Sharing information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited personal data to a variety of recipients including:

- our employees, agents and contractors where there is a legitimate reason for their receiving the information, including:
  - third parties who work with us to provide student accommodation.
  - third parties who work with us to provide student support services (e.g. counselling).
  - third parties who are contracted to provide out-of-hours IT services for us.
  - third parties who run or provide event services, including but not limited to sporting bodies.
  - organisations operating anti-plagiarism software on our behalf (such as Turnitin®) please see our Academic Regulations for further information.
  - internal and external auditors.
- those with an interest in tracking student progress and attendance, including:
  - student sponsors (e.g. the Student Loan Company, research sponsors, Research Councils, NHS).
  - current or potential education providers (for example, where you take part in an exchange programme as part of your course).
  - current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance).
- professional and regulatory bodies (e.g. Royal College of Veterinary Surgeons for the purpose of assessing fitness for practice) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses.
- government departments and agencies where we have a statutory obligation to provide information (e.g. the Office for Students ([OfS](#)), the Higher Education Statistics Agency ([HESA](#)), the Home Office (in connection with UK visas and immigration)).
- crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards).
- parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure).
- third parties conducting surveys, for example the National Student Survey.

## **International data transfers**

Some of the personal data we process about you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission).
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

## **Hartpury Alumni Association**

We pass certain of your personal data to our Hartpury Alumni Association when you graduate or finish your course.

Hartpury Alumni Association processes your personal information for carefully considered purposes, which we believe will be of benefit to you. Processing enables us to improve our relationship with you and includes some or all of the following purposes:

- to enhance and personalise services and communications for the benefit of Alumni Association members.
- to accurately monitor and report our graduate and leaver outcomes.
- to identify and prevent fraud.
- to better understand how people interact with our websites;
- to provide postal and/or telephone communications which we think will be of interest to you.
- to determine the effectiveness of alumni events and campaigns.
- Your personal data may also be used in fundraising programmes. We may also disclose limited personal data to our contractors for analysis in connection with fundraising activities.

We promise that we will always hold your Personal Data rights in high regard. You have a right to object to this processing and, if you wish, can opt-out at any time. An unsubscribe link is included in all our communications. Please bear in mind that this will affect our ability to keep you informed about alumni activities and carry out tasks for your benefit.

## **Student Surveys**

We conduct a range of surveys and sometimes this involves passing student and graduate contact details to survey contractors to carry out the compulsory surveys that

all institutions are required to be involved in. The surveying organisation will use your details only for that purpose and will then delete them.

### **Changes to your personal data**

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. Applicants can do this by contacting [admissions@hartpury.ac.uk](mailto:admissions@hartpury.ac.uk), current Higher Education students should contact [student.advisors@hartpury.ac.uk](mailto:student.advisors@hartpury.ac.uk) and Further Education students should email [mis@hartpuryac.uk](mailto:mis@hartpuryac.uk)

### **How long your information is kept**

Subject to any other notices that we may provide to you, we may retain your personal data for up to a period of six years after your association with us has come to an end. However, some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes (or by the Alumni Association for the purposes of supporting your lifelong relationship with us).

### **Your rights**

Under the GDPR and DPA 2018 you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you.
- to require that we cease processing your personal data if the processing is causing you damage or distress.
- to require us not to send you marketing communications.
- to require us to correct the personal data we hold about you if it is incorrect.
- to require us to erase your personal data.
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal).
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Data Protection Officer using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

## Contact us

If you have any queries about this privacy notice, how we process your personal data or to request access to the personal data that we hold about you can contact our Data Protection Officer by email: [dpo@hartpury.ac.uk](mailto:dpo@hartpury.ac.uk), this [form](#) or by post: Data Protection Officer, Hartpury University and Hartpury College, Hartpury House, Gloucester, GL19 3BE.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

## Approval and Review Cycle

Date Last Approved	September 2020
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Approving Committee	Strategy, Finance & Resources Committee
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