

GENERAL PRIVACY POLICY 2024



HARTPURY

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.

Hartpury collects and processes personal data in order to function effectively as an educational institution, to meet our statutory responsibilities and to provide students with the support they require whilst undertaking their studies and staff with the support they need for their roles. Personal data are processed for a variety of reasons (as set out below) and all such personal data will be collected and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

This privacy notice concerns our processing of personal data of past, present and prospective students and past, present and prospective staff, self-employed contractors and consultants, voluntary workers and honorary and associate staff or users ("you", "your") of services provided by Hartpury in relation to the processing of your personal data.

In this notice:

- **personal data** means any data which can identify an individual directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This does not include data that has been manipulated so that you can no longer be identified from it (anonymous data) but does include data that is pseudonymised (encoded data)
- **processing** means any activity relating to personal data including collection, use, alteration, storage, disclosure and destruction.

Unless Hartpury processes your personal data on behalf of another organisation for purposes that have been determined by that organisation, Hartpury University and Hartpury College is the data controller of your personal data (ICO Registration numbers Z1591909 & ZB165599).

CHANGES TO THIS NOTICE

Hartpury may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes, however where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

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 as a student or member of staff, for example when you express your interest in studying or working at Hartpury (for example by applying for a post or booking a place on an open day)
- 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 and register as a student with Hartpury
- when you apply to work at Hartpury
- when you communicate with us by telephone, email or via our website and social media, 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 or member of staff of Hartpury, including your use of Hartpury resources, services and systems and other interactions with Hartpury for the various purposes set out below
- from third parties, for example from UCAS, other institutions that deliver joint programmes with Hartpury, Government departments such as the Home Office, the Student Loans Company, organisations with whom you undertake placements or work experience and 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 PROCESS

We only process 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 (term time and holiday addresses), 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, your nationality and ID photo. For students we will also allocate you a unique student number and will also process other unique system IDs (e.g. UCAS personal ID). Staff will also be allocated a unique staff number.
 - Information provided as part of your application to study or work at Hartpury or created as part of the interview process (e.g. interview notes etc).
- 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 attendance, assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record/staff 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.
- Financial information
- Information about your work, study and/or living support needs in order to provide you with the appropriate working, learning and/or living environment.
- Visa and immigration information (including visa and passport details)
- Information provided in relation to extenuating circumstances, appeals and complaints
- Disciplinary information
- Caring responsibilities
- CCTV footage whilst on campus, photographs and video footage during teaching, events or other activities.
- Other legitimate personal data relating to academic and pastoral support and health and safety obligations.

We may also collect, or you may be required to provide us with, the following **special categories** of more sensitive personal data:

- information revealing your race or ethnicity, religious beliefs, sexual orientation (whether or not indicated by your gender or gender identity) and political opinions
- information about your health, including any disability or medical condition, and dietary requirements
- information about criminal convictions or offences

These types of personal data require us to take additional steps to ensure their security and confidentiality.

PERSONAL DATA PROVIDED BY YOU ABOUT OTHERS

You may provide us with personal data about other individuals, for example, emergency contact details and information about your family circumstances and dependents (for example to assess bursary and grant eligibility and provide pastoral care services). Students should notify the relevant person that they are providing their contact details to Hartpury as their listed emergency contact.

HOW WE USE INFORMATION ABOUT OUR STUDENTS AND OUR STAFF

The purposes for which we may process the personal data (including sensitive personal data) that we collect during a staff/student's association with us include:

- Recruitment, administration of applications and admissions (including compilation of statistics)
- 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/staff records in order to comply with statutory obligations and obligations to our students and staff
 - ❖ assessing your eligibility for bursaries and scholarships, etc.
- Providing library, IT and information services
- Provision of references
- Behaviour management
- Supporting provision of work placements or work experience
- Non-academic matters in support of our core services, including:
 - ❖ Administering student support services (eg. Disability and Additional Learning Support, Innovation, Careers & Employability, Health & Wellbeing (inc. counselling), Student medical, sports performance monitoring and injury, personal supervisors and tutors and academic departments)
 - ❖ monitoring equal opportunities.
 - ❖ safeguarding and promoting the welfare of students.
 - ❖ ensuring students' safety and security.
 - ❖ managing the use of social media.
- Provision and management of Hartpury owned and privately owned property for students.
 - ❖ managing car parking on campus.

- Administering finance (e.g. fees, scholarships and bursaries and the use of debtor information to make decisions about withholding bursary payments, preventing reregistration of returning students and inviting students to graduation ceremonies).
- Promotion of Hartpury (for example, providing information about programmes which may be of interest to you, summer schools etc)
- Other administrative purposes, including:
 - ❖ carrying out research and statistical analysis.
 - ❖ auditing compliance with our regulatory and legal obligations and policies.
 - ❖ 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 (for example CCTV, security incident reports)
 - ❖ dealing with grievances, appeals and disciplinary actions.
 - ❖ provision of student ID card
 - ❖ dealing with complaints and enquiries.

Hartpury will also use student/staff personal data to produce non-identifiable statistical data for analysis to fulfil its commitment to equality monitoring, to provide a more targeted response to improving the student experience, and to respond to freedom of information requests.

STUDENT RELATED – PRIZE DAY, GRADUATION AND DEGREE INFORMATION

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

LAWFUL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

We will only use your personal data when we are permitted to do so by law. Most commonly, we will use your personal data:

- **to perform a contract** Hartpury has entered into with you or take steps before entering into a contract with you at your request (for example, as part of the admissions process and once you have enrolled as a student, to provide you with the services set out in the Student Agreement and/or Terms and Conditions).
- **to comply with Hartpury's legal obligations** (for example, complying with immigration, anti-money laundering, health and safety and safeguarding laws, preventing and detecting crime, assisting the police and other authorities with their investigations).
- **to perform tasks carried out in the public interest** which are mainly set out in Acts, Statutes, Ordinances and Regulations.
- **where necessary for our legitimate interests** or those of a third party provided the individuals' interests and rights do not override those interests (for example, providing services that do not form part of the Student Agreement, monitoring the effectiveness and performance of the Hartpury's teaching, promoting equality and diversity, providing administrative and management services and recovering monies owed to us).
- **to protect your vital interests** or those of another person (for example where we know or have reason to believe that you or another person may suffer harm).

In circumstances, where you have a genuine choice as to whether we should process your personal data, we will ask you for your **consent**. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your **explicit consent** unless a condition applies which allows us to process such personal data without doing so.

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 Hartpury, including by training our staff or monitoring their performance.
- to maintain and improve the academic, corporate, financial, estate and human resource management of Hartpury.
- to promote equality and diversity throughout Hartpury.
- 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.
- 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).

SHARING INFORMATION WITH OTHERS

Where there are lawful grounds for doing so, Hartpury may share your personal data with certain third parties. Examples of this include, but are not limited to:

- Individuals employed or engaged by Hartpury, to the extent necessary to perform their duties
- 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 (eg. Research sponsors, research councils, NHS)
 - ❖ Current or potential education providers (eg. 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), Education and Skills Funding Agency (ESFA), the Higher Education Statistics Agency (HESA), the Home Office (in connection with UK visas and immigration).
- Student Loans Company and other bodies involved in student finance (for example, Student Awards Agency Scotland, Student Finance England, Student Finance Wales, Student Finance Northern Ireland, Student Finance European Union) - to allow students to receive their loans
- Department for Education and Local Education Authorities
- Local authorities in relation to Council Tax exemption, maintaining the electoral roll and administration of housing benefit
- External examiners
- 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.
- Agents assisting Hartpury with international admissions (limited to what is strictly necessary for the performance of the agent's role) - this may include the disclosure of personal data outside the European Economic Area
- Other education institutions, partners or research organisations where a student's programme is being run collaboratively, or where such parties host students for elements of their programme (for example, other universities, colleges, schools and industry bodies)
- Third parties performing administrative functions on behalf of Hartpury (acting as data processors)
- Work placement providers
- Debt collection agencies – when students have not paid fees that they owe
- The Government and local authorities during information gathering exercises when Hartpury is legally obliged to provide data
- Potential employers and other educational institutions requesting a reference for a current or past student (consent is implied by providing Hartpury's details as a referee). This includes confirmation of awards.
- Academic and research staff for the purposes of research (potentially involving disclosures to external organisations or regulators, under contract and properly assessed) – steps will be taken to protect your identity, which will not be published, and data will not be used to take decisions about you individually.
- Where Hartpury uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

If you have identified any next of kin through your application or registration, parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to such persons unless you have given consent.

Please note that we may need to share your personal information with a regular or to otherwise comply with the law.

INTERNAL DATA TRANSFERS

Some of the personal data we process about you may be transferred outside of the European Economic Area (EEA). The University will only transfer data to countries outside the EEA when satisfied that both the party which handles the data and the country it is processing it in provide adequate safeguards for personal privacy.

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

- where the transfer is subject to appropriate safeguards for international transfers;
- where we have your explicit consent;
- contractual obligation.

STUDENT RELATED – 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.

SURVEYS

We conduct a range of surveys and sometimes this involves passing staff, student and alumni 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 | admissions@hartpury.ac.uk |
| CURRENT COLLEGE STUDENTS | MIS@hartpury.ac.uk |
| CURRENT UNIVERSITY STUDENTS | student.advisors@hartpury.ac.uk |
| STAFF | HR@hartpury.ac.uk |

HOW HARTPURY KEEPS YOUR PERSONAL DATA SECURE

Hartpury has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, Hartpury limits access to your personal data to the persons and organisations described above who have a need to access it.

Hartpury has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

HOW LONG YOUR INFORMATION IS KEPT

Hartpury must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, Hartpury has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from Hartpury's continued retention of the personal data
- the purposes for which Hartpury may process your personal data
- whether Hartpury is required to retain any personal data by law or in accordance with its legitimate interests

Generally speaking, all relevant correspondence in relation to your application and studies will be held by Hartpury and retained for six years after your graduation or departure, after which time it will be securely disposed of. Core information about your studies and academic awards (e.g. dates of study, courses studied, main academic details etc.) will be retained indefinitely. In some cases, Hartpury may anonymise your personal data so that it can no longer be identified with you, in which case Hartpury may retain such data indefinitely.

If notice of a legal claim or other proceeding is received, then Hartpury may retain and process relevant personal data in order to defend the claim for the duration of the same.

Whilst Hartpury may dispose of any personal data after the conclusion of the claim, please be aware that all litigation documents disclosed, or evidence given, may be a matter of public record.

Unless you opt out, the Alumni Association will retain your personal data indefinitely for the purposes of supporting your lifelong relationship with us.

CONTACT DIRECTORIES

The name and Hartpury email address of all staff and students will be included in the Hartpury email address book, the contents of which are accessible to all Hartpury staff and students, but not to external audiences.

YOUR RESPONSIBILITIES

You must ensure that any personal data collected and processed by you in the course of your work or studies is held in accordance with the Hartpury's Data Protection Policy. Any research involving the use of personal data should only be conducted following an ethical review. You have a responsibility to ensure the personal details we hold about you are up to date.

CCTV

Hartpury operates CCTV around its properties for security and crime detection purposes. For further information, please see Hartpury's CCTV Policy.

YOUR RIGHTS

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

- to obtain copies of the personal data that we hold about you.
- to request 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 where there is no good reason for Hartpury to continue processing it, or where you have exercised your right to object to the processing of 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. To exercise any of these rights you will need to contact Hartpury's Data Protection Officer at dpo@hartpury.ac.uk. Hartpury may be entitled to refuse any request in certain circumstances, and you will be notified accordingly where this is the case.

Where the lawful grounds relied upon by Hartpury to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, Hartpury may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though Hartpury may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the Hartpury may ask you to verify your identity before fulfilling any request in relation to your personal data.

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, or by post: Data Protection Officer, Hartpury University and Hartpury College, Hartpury, Gloucester, GL19 3BE.

If you are not satisfied with how we are processing your personal data, please contact the DPO in the first instance, before considering making 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.

REVIEW CYCLE

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|---------------------------|------------------------------------|
| DATE LAST APPROVED | May 2024 |
| POLICY OWNER | Director of Digital Services |
| APPROVAL COMMITTEE | SMT / Executive |
| STATUS | APPROVED |
| NEXT REVIEW DATE | May 2026 |
| LOCATION OF POLICY | Hartpury Website: Policies General |

EQUALITY, DIVERSITY AND INCLUSION

As with all Hartpury policies and procedures, due care has been taken to ensure that this policy is appropriate to all members of staff and students regardless of their age, disability, ethnicity, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation and transgender status.

The policy will be applied fairly and consistently whilst upholding Hartpury's commitment to providing equality to all. If any employee feels that this or any other policy does not meet this aim, please contact the HR Department.

Hartpury is committed towards promoting positive mental health and aims to create a culture of support where staff and students can talk about mental health problems without the fear of stigma or discrimination.