

# Student Privacy Notice

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## A. Introduction

This privacy notice is for current students from the point of provisional registration. The purpose of this notice is to inform students (including apprentices) about how the University collects, uses and shares their personal data, and their rights in relation to the personal data we hold.

This notice is available on the University website.

## B. Who is processing personal data?

Leeds Trinity University determines why and how your personal data is used and is the data controller of the personal data. This places legal obligations on the University.

The University is registered with the Information Commissioner's Office as a data controller under the reference Z4817023.

## C. What personal data do we process?

Leeds Trinity University processes personal data that is necessary for us to administer and deliver education services to you. This includes:

- information about you and your study and your communications with us including details of your demographic background, education, qualifications and publications
- financial information gathered for the purposes of administering fees and charges, loans, grants, bursaries etc
- copies of passports, visas, and other documents required to ensure compliance with Home Office and other conditions
- photographs and other identification information
- information about your participation and progression in learning and assessment activities
- information about your use of learning materials
- information about your use of University accommodation
- information about your participation in the use of student support and other University services

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- additional personal data may be collected by other institutions and training providers when delivering provisions in collaboration with LTU for specific course requirements and by services that you choose to access; information about how this data is used will be provided by the service in question.

### **Special category data**

We may also process “special category data” which includes information about your racial or ethnic origin, religious beliefs or other beliefs, sexual orientation, physical or mental health. We may also process information concerning any criminal offences or criminal proceedings.

## **D. The legal basis for processing your personal and special category data**

### **(i) Contract**

We may process your personal data and special category data because it is necessary for us to do so in order to fulfil the contract you enter into with the University when registering as a student or in order to take steps at your request prior to entering into a contract.

The University collects and processes personal information that is necessary to provide the required services to you for the contract and also to meet its legal and statutory obligations in delivering the contract.

### **(ii) Legitimate interests**

We may use and process your personal information where it is necessary for us to pursue our legitimate interests or a third party's legitimate interest. Such legitimate interests can include:

- monitoring attendance at lectures and other learning activities
- the recording of educational activities including lecture capture
- monitoring and investigating the use of IT services to maintain network and information security
- testing our systems to ensure optimum performance
- providing a safe and healthy environment, ensuring wellbeing and prevention and investigation of inappropriate activity
- verifying the accuracy of data that we hold
- analysis of data to evaluate performance throughout the University
- gathering student feedback through surveys
- improving our services via staff training
- promoting equality and diversity throughout the University
- recovering money that is owed to us
- promoting events happening at the University
- staying in touch with you after you graduate
- minimising the risk to the public as well as the delivery and continuation of operations

### **(iii) Legal obligation**

We may also process your personal data for our compliance with legal obligations. This can include:

- provision of personal and special category data to regulatory bodies where the University is legally required, in order to fulfil statutory obligations
- compliance with regulatory obligations such as anti-money laundering laws and safeguarding requirements
- assisting with investigations (including criminal investigations) carried out by the police and other competent authorities
- complying with court or other competent authority orders
- compliance with relevant national Health & Safety legislation, in particular government guidelines surrounding COVID-19 test and trace or other crisis management schemes

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#### **(iv) Vital interests**

The University will only rely on vital interests as a lawful basis for processing your personal data where it is necessary to protect someone's life.

#### **(v) Consent**

The University will use consent as a lawful basis for some processing. Where we do so we always provide you with the choice as to whether or not to opt in to such processing.

- We will provide academic references and confirmation of study to prospective employers and your local authority or council, with your consent.
- We will provide information to the Leeds Trinity Students Union with your consent
- We may process personal data provided by you for a specific purpose or purposes (for example, disability, catering preferences or lifestyle status for event management)

### **E. What we use personal and sensitive data for**

Leeds Trinity University processes your personal and special category data for the following reasons:

- the provision of teaching and associated services (e.g. registration, assessment, graduation)
- maintaining student records
- promoting the welfare of students
- to communicate with you for all matters relevant to your study at the University
- providing library, IT and information services
- administering student finances
- managing University accommodation
- managing the use of University services (e.g. student support services, careers service)
- making reasonable adjustments for students requiring support for special educational needs
- equal opportunities monitoring
- evaluating the performance and effectiveness of the University including research and statistical analysis
- to meet our compliance and regulatory obligations
- the prevention and detection of crime and assisting investigations carried out by relevant authorities
- dealing with disciplinary matters
- dealing with complaints

### **F. Automated decision making**

The University does not make any automated decisions about you using your personal data.

### **G. Who we share your personal data with**

Your data will be shared internally within the University with staff and departments that require the use of the data in order to administer your study and provide University services to you.

Data including your personal and sensitive data will be shared externally where the University has a legitimate need to do so in fulfilling the contract the University has with you or has a legal obligation to provide data. The following list provides examples of the most common occasions on which it is necessary to share your data.

- We will share some personal data (including your name, date of birth, email address, programme and level of study, start and end date and gender) with the Leeds Trinity

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Students' Union (LTSU) if you have provided your consent at registration for your first year of study of your current programme. LTSU use this information to communicate with you to provide services to you as a member of LTSU. The sharing of data between the University and LTSU is covered by a data sharing agreement. You can opt out at any time from LTSU holding your data through eVision.

- Other regulatory bodies that the University is legally required to provide data to including JISC & the Higher Education Statistics Agency <sup>1</sup> (HESA), Office for Students (OfS), Education and Skills Funding Agency (ESFA) <sup>2</sup>, Department for Education (DfE) <sup>2</sup>, NHS England, Student Funding Bodies, Quality Assurance Agency for Higher Education (QAA), Office for Standards in Education (OFSTED), Audit Agencies and subject-specific accreditation organisations. This may also include providing details to organisations representing those bodies e.g. OfS use Ipsos Mori to conduct the National Students' Survey for which the University is required to provide the contact details of its students.
- We will provide information to the police and other enforcement agencies in the event of an emergency or where required to assist the prevention or detection of crime.
- The University may also pass information about a student to an appropriate third party where there is concern about the welfare of a student to safeguard the interests of the student.
- We will provide information to UK Visas and Immigration (UKVI) where required in relation to students holding Student Visas.
- Employers and organisations with whom placements are arranged as part of your programme of study in order to facilitate the placement including Heales Medical, Leeds University and the University of Bradford.
- Employers of students (to include apprentices) studying on a Higher or Degree Apprenticeships programme.
- Other institutions and training providers when delivering provision in collaboration with Leeds Trinity University.
- We will share appropriate data with other institutions and organisations to enable the delivery of Higher and Degree Apprenticeships
- For accommodation services data sharing includes debt recovery, crime prevention and/ or detection, insurance policy, the enabling of halls Wi-Fi (Wifinity), mail services (Parcel Tracker), providing relevant information to our agents and contractors, including disclosure of relevant information to the police, other law enforcement agencies, the Benefits Service, utility companies, local authorities, immigration authorities or other government agencies.
- References to potential employers, other education institutions and letting agencies where the student has named the University or a staff member as a referee.
- Professional bodies where appropriate for the programme of study to validate and accredit qualifications.
- To confirm students' council tax exemption and resident student addresses for electoral registration purposes with local authorities.
- We will share some personal data with our external supplier for the purpose of providing graduation gowns required for attendance at graduation ceremonies.
- We will provide, if required, information to authorised government agencies and contact tracing schemes (such as NHS Test and Trace in England) in connection with COVID-19 or other crisis management scenarios.
- We will share information with the Nursing & Midwifery Council, the NHS, its agencies and trusts in relation to students who receive, or may receive, education and placements from the NHS. We may also share information about you in a medical emergency.

<sup>1</sup> HESA Student Collection Notices can be found at:

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

<sup>2</sup> ILR Privacy Notice can be found at [ILR Privacy Notice 2023 to 2024](#)

## **H. Use of personal data for student learning and support**

The University collects and uses data to support students and help them to succeed; this includes learning analytics to monitor attendance and to analyse student engagement. The University's approach to the use of learning analytics is one of 'informed consent'. This means the University will make students aware which of their personal data may be used for learning analytics, and students effectively give their permission for their data to be used in this way at the point of registration.

## **I. Changes to your personal data**

It is the responsibility of the student to notify the University as soon as possible if any of the data held about them needs to be updated or is incorrect. The University provides an opportunity annually for you as a student to check your details through the registration process and also requires students to use eVision to notify changes more promptly.

## **J. Will your personal data be sent or stored abroad?**

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

In these circumstances, your personal data will only be transferred 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.

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

The University will retain personal data for no longer than is necessary to fulfil its contractual and regulatory obligations in line with our retention schedule available [here](#).

The University's Alumni Department will also retain a record after you graduate if you have opted to become an Alumni member. This information will be used for alumni activities and keeping you informed of services and events provided by the University for alumni.

## **L. How you can access personal information the University holds about you and other rights you have**

### **1. The right to be informed**

You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.

### **2. Right of access**

You have a right of access to your own personal data held by the University. Most data held about you is available for you to view online through eVision whilst a student of the University. Furthermore, a request to see the personal data held by the University can be made through a Subject Access Request. Further information about how to request this is available [here](#).

### **3. The right to rectification**

You have the right to have inaccurate personal data held by the University rectified or completed if it is incomplete. This can be done through eVision or by contacting the Student Records team at: [records@leedstrinity.ac.uk](mailto:records@leedstrinity.ac.uk).

#### **4. The right to erasure**

Once personal data collected by the University is no longer necessary for the purpose for which it was collected and processed, you may have the right to have the data erased. The University manages the retention period of data held through its retention schedule.

#### **5. The rights to restrict processing and to object to processing**

In certain circumstances you have the right to restrict the processing of your personal data. This is likely to arise when there is an issue concerning the accuracy or the legitimate grounds for processing of the personal data.

#### **6. The right to object to processing**

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

The University will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

#### **7. Rights to data portability**

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. The University will respond to any Subject Access Requests in compliance with this. Further information about how to request this is available [here](#).

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and, where the processing is carried out by automated means, request that we transmit those data to another data controller.

#### **Note:**

Detailed guidance on all of the rights you have with regard to the personal data that we hold and process about you is available on the ICO website here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

## **M. Contact us**

If you have any queries about this privacy notice or how we process your personal data you can contact us at: [dataprotection@leedstrinity.ac.uk](mailto:dataprotection@leedstrinity.ac.uk)

## **N. Questions or concerns**

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer. If you would like to report a data security breach (e.g. if you think your personal data has been lost or disclosed inappropriately) or if you would like to complain about how the University has used your personal data, please contact the University's Data Protection Officer at [dataprotection@leedstrinity.ac.uk](mailto:dataprotection@leedstrinity.ac.uk) or write to

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Should you be dissatisfied with our handling of your concerns, you have the right to complain to the Information Commissioner at <https://ico.org.uk/concerns/handling>.

## **O. Evaluation and review**

This policy will be formally reviewed every year by the Data Protection Officer and the relevant department(s) within the University. In addition, the effectiveness of this Policy will be monitored as necessary on an on-going basis to ensure it is compliant with relevant legislation.

This policy was last updated in May 2024.