

FAIR PROCESSING NOTICE FOR STUDENTS

This fair processing notice (FPN) is provided to you to inform you how your personal data will be processed and the purposes for which the data has been collected. This notice also provides information on other areas where we may process your personal data and explains how you can opt out of some aspects of the processing, where applicable.

Summary

- The Data Protection Act (1998) is being updated to reflect changes in technology and, how your personal data is collected, used and shared. In the UK, the new law will be called the Data Protection Act 2018 and will be based on the General Data Protection Regulation.
- For the purpose of this law, Ravensbourne University will be acting as the Data Controller and will make decisions about how to use any personal data we collect from you.
- As a prospective or as a student, Ravensbourne may collect and use data relating to personal details, family and social circumstances, education and training records, employment information, financial details, and services provided. In addition, we may collect and use special category data about you such as information relating to your ethnicity, religion, sexual orientation, disability or medical condition for specific purposes.
- The principle purpose for processing personal data to prospective or enrolled students is to facilitate the provision of your university education by way of a contract between Ravensbourne and you.
- Other purposes for which we process your personal data include:
 - administering your studies including inter alia information relating to attendance, academic progress, assignments and assessments, appeals and graduation;
 - Provide access to our services and infrastructure;
 - administering financial systems and accounts;
 - fulfilling a legal, regulatory and/or statutory obligation (e.g. the submission of data to HESA);
 - the fulfilment of funding agreements either between Ravensbourne and a funding body or between the student and a funder or sponsor;

- to carry out quality assurance activities to maintain and improve your experience as a student;
- Promoting courses, training opportunities and other Ravensbourne services;
- Maintain alumni details and publicise and carry out alumni activities
- statistical and research purposes in accordance with GDPR Article 89(1) which may include supporting internal and external research projects in the public interest, where Ravensbourne is satisfied that this will have no impact on the individuals;
- Every person has rights associated with how their personal data is used and processed. These rights include:
 - To be informed what personal data about you the University holds and what it is used for
 - To access your personal data
 - To update the personal data the University holds about you
 - To be informed how the University is complying with its obligations under the Act
 - To complain to the Data Protection Officer if you believe that the Data Protection policy has not been followed.
 - To complain to the Information Commissioner (ico.org.uk) if you believe that the Data Protection Act has not been followed.
 - To have personal data erased where there is no compelling reason for us to keep the data

For information on how to exercise your information rights, or to see the full version of this fair processing notice, please visit www.ravensbourne.ac.uk/privacy

Data Protection and Student Data at Ravensbourne

The Data Protection Act 2018 (DPA) regulates the processing of personal data in any format by Ravensbourne including both digital and hard copy personal data and personal data in all other formats. 'Personal data' is any information relating to a living individual, and 'processing' is any activity carried out involving personal data, including collecting, holding, viewing and storing it.

This statement establishes our procedures governing the collection, storage, use and disclosure of student data. It is provided to all students at enrolment and via the Intranet. The statement includes information about how student data is collected, used, and where it is supplied by us to external third parties.

Ravensbourne acts as the data controller for all personal data that it holds and processes, except where it is done in the capacity of a data processor on behalf of another data controller. Our contact details are:

Ravensbourne University London
6 Penrose Way
London
SE10 0EW

Our Data Protection Officer works independently with us to ensure that we protect your personal data and to comply with our legal requirements. Our DPO can be contacted on dpo@rave.ac.uk or by writing to us at:

Data Protection Officer
Ravensbourne University London
6 Penrose Way
London
SE10 0EW

Information We Collect

During the course of our activities, we will collect, store and process personal information about our prospective, current and former students. For the purposes of this Fair Processing Notice, 'students' refers to your interactions with us at the application stage, at enrolment, at graduation and throughout the period of study to form the student record.

We treat all student personal data in a fair and lawful manner and in line with the data protection principles. No personal information held by us will be processed unless the requirements for fair and lawful processing are met. This Fair Processing Notice provides a summary of how we will ensure that we do that, by describing:

- The categories of personal data we will handle;
- The purpose(s) for which it is being processed; and
- The person(s)/ organisation(s) it will be shared with.

Types of Personal Data Processed

In order to carry out our activities and obligations as a University, we process data in relation to:

- Your contact details and other information submitted during the application and enrolment processes;
- Details of courses, modules, timetables and room bookings, assessment marks and examinations related to your study;
- Financial and personal information collected for the purposes of administering fees and charges, loans, grants, scholarships and hardship funds;
- Photographs, and video recordings for the purpose of recording lectures, student assessment and examinations and for the purposes of university promotion that is in our legitimate interest but still fair to you;
- Information about your engagement with the University
- Contact details for next of kin to be used in an emergency;
- Details of those with looked after status or those who have left the care system for the provision of support;
- Information related to the prevention and detection of crime and the safety and security of staff and students, including, but not limited to, CCTV recording and data relating to breaches of University regulations;
- Information gathered for the purposes of equal opportunities monitoring;
- Information relating to the provision of advice, support and welfare, such as data relating to the use of the services offered by Student Services;

- For international students: Copies of passports, visas and any other documents required to ensure compliance with Home Office requirements as well as information collected in relation to attendance.

We will also obtain, hold and process the special category personal data (the term used by the GDPR) or other sensitive data of students including:

- Personal demographics (including gender identity, race, ethnicity, sexual orientation, religion);
- Medical information including physical health or mental conditions;
- Biometric/Genetic information;
- Information relating to health and safety;
- Trade union membership;
- Records of employment matters such as performance development reviews, disciplinary, grievance and performance management;
- Criminal offences (including alleged offences), criminal proceedings, outcomes and sentences.
- Disclosure and Barring Service checks;
- Employment Tribunal applications, complaints, accidents, and incident details.

Emergency contact details provided by staff will be used to protect your vital interests and wellbeing and will only be used for this purpose. You should notify the relevant person that you are providing their contact details to the University as their listed emergency contact.

Primary Purposes for Processing

Your personal data is processed primarily for the following purposes:

- Student welfare / pastoral care e.g. contact with personal tutor or Student Services
- Administration and provision of wellbeing or health related issues eg health care services by Student Services
- Financial administration e.g. payment of tuition fees, provision of loans and bursaries via the Student Funding Office
- Security and crime prevention / detection e.g. use of regulated CCTV, security incident reports
- Library services e.g. administration of membership, cards, loans and fines
- Provision of student ID card

- Provision and maintenance of computing facilities - including email accounts and internet access
- Educational administration e.g. registration, progress monitoring, timetabling, calculation and publication of assessments, provision of references
- Accommodation e.g. provision and management of University owned and privately owned property for students
- Administration of applications e.g. receiving and processing UCAS forms, compilation of statistics, assessments of applications including preliminary and confirmed offers. Some liaison with UCAS.
- Advisory services e.g. careers and financial advice
- To produce statistics and management information to enable the University to understand its business and for strategic and management decision making.
- For electoral roll purposes. When students have agreed for their data to be shared with Local Authorities for automatic inclusion on the electoral register.
- Upon graduation, the names of those graduating are published in the award brochure. Where students do not wish for their names to be included they may inform the Registry.
- To provide those with identified needs with access to support and University services

This is not an exhaustive list but sets out the primary purposes the University has for handling student personal data.

The University will also use student personal data to produce non-identifiable statistical data for analysis to fulfil its commitment to equality monitoring and provide a more targeted response to improving the student experience.

Legal Basis

Every organisation that processes your personal data is required to have a legal basis for doing so. The majority of data you provide to us as a student will be processed on the basis of being necessary for the performance of a contract under which the University agrees to provide academic services to you. Some processing activities will also be carried out for other reasons such as:

- Under a legal obligation (for example, disclosing personal data to external parties under statutory powers);

- Where it is necessary to protect your vital interests or another party (for example, disclosures to external parties to ensure the safety and wellbeing of individuals);
- Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example, awarding a degree or providing you with lectures or assessments);
- Where it is necessary for legitimate interests pursued by us or a third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of the interests or rights of individuals);
- Where any of these legal bases do not apply, your consent to process your personal data will be sought and will it will be made clear to you what you are being asked to consent to. You have the right to withdraw consent at any time.

Ravensbourne Student Union

We will share personal data with the Ravensbourne Students' Union in order to allow students to participate in the election of its officers and to become a member of the Students' Union. Having contemplated the work of the Students' Union, it is considered that this processing is necessary for the purposes of the legitimate interests pursued by the Students' Union and that this does not override the rights and freedoms of the individual.

Ravensbourne Alumni

Following graduation, personal data is processed by External Relations within the University as all individuals **graduating automatically become members of the University's Alumni** Community. For alumni at Ravensbourne, there are a number of benefits including access to - publications, careers advice, details of further education opportunities, organised reunions, networking events and opportunities to support the University.

Additionally, the Alumni team hold the most up to date information on former students including details of communication preferences. At graduation and periodically in the future, individuals will be asked by alumni to state their communication preferences. Having contemplated these factors, it is considered that this processing is necessary for the purposes of the legitimate interests pursued by us as data controller and that this does not override the rights and freedoms of the individual. For more details on the use of your personal data for the purposes of alumni administration, please see the alumni fair processing notice.

CCTV

The University operates a CCTV system around its sites, the purpose of which is to create a safer environment for students, staff and visitors to the University. Due to the nature of such a system it is likely to capture images of staff.

CCTV is limited to public areas such as the foyer, corridors, landings, open learning and relaxation areas.

CCTV is not used for the routine monitoring of students and images are only used in circumstances that Ravensbourne could not ignore, where there is a risk of or actual criminal activity taking place, where there is gross misconduct alleged or undertaken or where behaviours of students may put others at risk.

Where images are used in any disciplinary procedures the individual students will have access to the CCTV footage which they will be able to view. On occasion, it may become necessary to install cameras for the specific purpose of monitoring activity in a particular area. This will be used only in exceptional circumstances where there is a reason to suspect criminal activity or equivalent malpractice. Any decision to monitor activity in this manner must be authorised by a member of the Executive and will only be used as a proportionate response to the problem. For further information, please contact the Data Protection Officer at dpo@rave.ac.uk or at the address given above.

Legal Obligations

The legal obligations under which we need to process personal data include (but are not limited to):

- Student record administration (including student finance, bursary payments and grants)
- Business management and planning
- Monitoring under the Equality Act (2010)
- Accounting and Auditing
- Crime prevention and prosecution of offenders
- Education
- Health administration and services
- Information and database administration
- Sharing and matching of personal information for national fraud initiatives

Other than where there is a legitimate business need or a statutory/legal duty to share your information, we will not publish any information that identifies you or routinely disclose any information about you, without your explicit consent. If processing of your personal data is carried out solely on the basis of your consent, you have the right to withdraw this consent at any time by contacting the Data Protection Officer (dpo@rave.ac.uk).

Sharing your information

Where necessary and proportionate, your personal information will be shared internally within the Colleges and Departments across the University. Personal data is protected by the University and information will not be disclosed to third parties without consent, or, is permitted by law. This section outlines the major organisations and the most common circumstances in which we disclose data about students. Where this involves international transfer of your data, data will only be transferred if it meets the conditions set down under current data protection legislation.

After graduation the University will need to maintain some records in order that it can verify awards, provide transcripts of marks, to provide academic references and for career support.

Following graduation, personal data is processed by the Alumni Team within the University **as all individuals graduating automatically become members of the University's Alumni Community.**

The University is an Approved Education Provider for the purposes of the Points Based Immigration System. The University will provide data about students on the Tier 4 Student Visa and other categories of visa to the Home Office and its departments in order to fulfil its duties as a Tier 4 Sponsor Licence holder.

We will also share your data with:

- Sponsors and parents where consent has been provided.
- HE/FE institutions & placement providers: Where students are involved in study arrangements with other organisations, e.g.: exchanges, placements, joint/double programmes, we may disclose some data to the relevant institution, including those outside the European Economic Area (EEA).

- The Student Loan Company: Personal data will be shared to confirm enrolment, attendance and identity in order that students can access financial support.
- Debt recovery / credit control: Personal data may be shared with third parties, attempting to recover debt on behalf of the University, where internal debt recovery procedures have been unsuccessful.
- Potential employers or providers of education whom you have approached.
- UK agencies with duties relating to the prevention and detection of crime, collection of a tax or duty or safeguarding national security

The University has a statutory obligation to release information to the Higher Education Statistics Agency (HESA) for statistical analysis. Full details on the uses of student data by HESA can be found at <http://www.hesa.ac.uk/fpn>.

The University is required to pass data about its students to the Higher Education Funding Council for England (HEFCE) for them to conduct the National Student Survey. This provides students with the opportunity to give their feedback on their experiences at the University. Information will also be provided to HEFCE in line with our statutory responsibilities.

Personal data relating to students on specific programmes will be passed to professional bodies which accredit those programmes at the University in connection with registration. If there has been an incident of academic or professional misconduct and/or where the Head of School or equivalent believes there is a concern related to fitness to practise which may result in a risk to the public, this will also be reported to the appropriate professional body.

Personal information may be shared with work placement providers including contact **details, information around the individual's studies and other necessary information.**

Following graduation the University or HESA may contact individual students to ask them to complete one or more surveys into the outcomes of higher education and details of activities after graduation. These surveys may be undertaken by the University or by another specialist organisation contracted for that purpose. If a specialist organisation is used that **organisation will receive the individual's contact details, but will only use these details to ask** individuals to complete the survey, these details will then be deleted. Individuals may also be contacted as part of an audit to check that the University or any contracted organisation have undertaken these surveys properly.

Coursework and assignments may be submitted through Turnitin® UK, which supports academic staff in identifying any plagiarism, re-presentation and inappropriate citation. Where plagiarism is suspected, work and information may be shared internally and with other institutions as required.

Data may be shared with partner colleges where the University has partnership arrangements in place. Information that would be shared for purposes relating to their studies and for administrative purposes.

Personal information may be shared with organisations (including other education providers) with whom we work collaboratively and with other agencies (including the Welsh Government) where there is a requirement on the University to report on outcomes and progression.

Any other disclosures that we make will be in accordance with data protection legislation and your interests will be considered

Third Parties

We will make some statutory and routine disclosures of personal data to third parties where appropriate. These third parties include:

- Higher Education Statistics Agency (HESA)
- The Office for Students
- UK Visas and Immigration Office
- HM Revenue and Customs (HMRC)
- Pension schemes – including UBPAS, USS and others (as set out in the scheme rules)
- Research sponsors/funders
- Trade unions
- Potential employers (where a reference is requested)
- Benefits Agencies as required by the Social Security Administration Act 1992
- Child Support Agency as required by the Child Support Information Regulations 2008 (no.2551)
- Potential employers (where a reference is requested)
- Benefits Agency as required by the Social Security Administration Act 1992
- The Student Loans Company
- Local Government Agencies

Personal data may also be disclosed when legally required, or, where there is a legitimate interest, either for the University or others, taking into account any prejudice or harm that may be caused to you as the data subject.

We also use third party companies as data processors to carry out certain administrative functions on our behalf. In such cases, a written contract will be in place to ensure that any personal data disclosed will be held in accordance with the Data Protection Act.

We will confirm the dates and nature of an individual's employment to a prospective employer in a reference. In certain circumstances such as the non-payment of loans for example, we may choose to pass the data of staff debtors to an external debt collection agency if we have been unable to recover the debt by normal internal financial or HR processes.

Where a member of staff's employment with us requires study, employment, or a placement at another organisation it may be necessary for us to transfer personal data to the external university or employer, whether this is within the UK, the European Economic Area (EEA) or to another country. This may require some data being sent outside the EEA to countries which may have lower standards for the protection of personal data. In such cases, we will take all reasonable steps to ensure that the transfer is proportionate, secure, and fair.

Submission of your information to HESA

It is a statutory requirement for us to send some of the information we hold about you to HESA every year ("Your HESA Information"). HESA is the official source of data about UK universities and higher education colleges www.hesa.ac.uk.

HESA collects, and is responsible for, the database in which Your HESA Information is stored. HESA is a registered charity and operates on a not-for-profit basis. HESA uses Your HESA Information itself for its own purposes. HESA also shares Your HESA Information with third parties for specified and lawful purposes. It may charge other organisations to whom it provides services and data. HESA's use of Your HESA Information may include linking information from it to other data, as described in the HESA statement linked to below. All uses of HESA information must comply with the Data Protection Act 2018 and the General Data Protection Regulation.

If you choose to provide information about your disability status, ethnicity, sexual orientation, gender reassignment or religion, these may at our discretion, be included in your HESA information and used to assist with monitoring equality of opportunity and eliminating unlawful discrimination in accordance with the Equality Act 2010.

Some other sensitive information/special category data is used to enable research into the provision of fair access to higher education, for example information as to whether you are a care giver.

To read the full HESA Staff Data Collection Notice please visit:

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

Cookies and Analytics

If you visit ravensbourne.ac.uk, we will send your computer a “cookie”, a small text file that resides on your computer’s hard drive. Cookies identify a user’s computer to our server but in no way gives us access to your computer or any information about you, other than the data you choose to share. The University website uses cookies for collecting user information and allows the University to make our website more useful by tailoring the services we offer from time to time. You can set your browser not to accept cookies, although you may not be able to access all of the features on ravensbourne.ac.uk

The website ravensbourne.ac.uk, and associated Ravensbourne sites also use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your visit to our website and compile reports and help us improve the site.

Google stores the information collected by the cookie on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. See [Google’s Privacy Policy](#) for more information.

Individual Rights

Individuals whose personal data and sensitive personal data/special category data is held by us have the following Information rights:

- a) The right to request access to the personal data held by us
- b) The right to have inaccurate or incomplete personal data rectified.
- c) The right to erasure of personal data – this will only apply where there is no legitimate reason for us to continue to process the personal data. There will usually be a requirement for us to keep a basic record indefinitely.
- d) The right to restrict the processing of personal data – individuals have the right to block the processing of their personal data in specific situations.
- e) The right to data portability – some data subjects have the right to request provision of some elements of their information (for example employment details) in digital form in order to provide it to other organisations.
- f) The right to object – staff can object to the processing of their personal data in certain circumstances, including the sending and receipt of direct marketing material.
- g) The right to object to automated decision making and profiling – individuals have the right to object to decisions taken by automatic means without human intervention in some circumstances.

Note: These rights are not absolute in every circumstance and a number of factors such as exemptions in law apply. All requests to exercise any of these rights should be made to the Data Protection Officer.

Where the processing of your personal data or sensitive personal data/special category data is based only on your consent, you have the right to withdraw their consent at any time by contacting the Data Protection Officer (dpo@rave.ac.uk). Examples of where we can only rely on your consent include marketing and promotions, or research.

If you are unhappy with our handling of your personal data, or believe that the requirements of the DPA or GDPR (or any legislation arising directly from it) may not be fully complied with, please contact Ravensbourne's Data Protection Officer at dpo@rave.ac.uk. The formal complaint procedure will be used if appropriate, and you have right to submit a complaint to the Information Commissioner's Office; further details can be found at www.ico.org.uk.

University Monitoring

Students should be aware that, in certain circumstances, particularly those that involve the prevention or detection of crime, fraud or misuse, we will monitor usage of its IT systems, spaces, and, could at its discretion access user information on its systems, networks and

CCTV. Any institutional monitoring or access will comply with UK legislation including the Regulation of Investigatory Powers Act 2000, Human Rights Act 1998, and the Data Protection Act 2018. Where necessary, any access or monitoring will be targeted, fair and proportionate, and will be in line with our institutional policies. For further information please contact the Data Protection Officer (dpo@rave.ac.uk).

Records Retention

Your personal data will be kept in line with the University Records Retention Schedule, which is available on request. This is a large document so, if you have any specific queries, please contact the Data Protection Officer (dpo@rave.ac.uk).

Your personal data will be disposed of when:

- We have met our legal retention requirements for your personal data or;
- We no longer have a legitimate reason to maintain that data and it is considered not to contain material that has archival value.