

# Privacy Notice Student Enrolment and Application 2023-24



## **Privacy Notice**

The University is committed to looking after any information that you make available to us when you apply to study at the University and during your time at the University. We aim to be clear about what we will do with your data. This privacy notice explains when and why we collect personal information about you and how we will use this information including the ways we might share this with others. It also explains how we keep your information secure as well as the rights you have in relation to the information we hold about you.

The headings below set out the main information we need to give to you.

The privacy notice will be regularly reviewed to make sure it contains the most up-to-date information. You should check our website to review a copy of our most recent privacy notice. If we make any significant changes to our privacy notice we will contact you to let you know.

We have a separate privacy notice which provides information on how we might use information about our alumni. Your details will automatically be passed to our Fundraising and Alumni team when you finish your studies so if you do not wish to hear from them then you should let us know by contacting [alumni@uws.ac.uk](mailto:alumni@uws.ac.uk).

If you have any questions about any of the information contained in this privacy notice then you can contact us at [dataprotection@uws.ac.uk](mailto:dataprotection@uws.ac.uk).

## **Who are we?**

The University of the West of Scotland (referred to in this Privacy Notice as the “University”, “we”, “our” or “us”) is the Data Controller under the data protection legislation. This privacy Notice sets out how we process personal data about our past, current or prospective students (referred to in this Privacy Notice as “you” or “your”).

## **What type of information do we collect about you?**

We will collect a variety of information about you. For example:-

- Your name, address, date of birth and details of your next of kin;
- Your passport and visa details and any documentation you provided for your visa application;
- Information relating to your education and employment history such as your dates of study at a previous institution, the results of any examinations or assessments you took there and academic references we obtain as part of our admissions process;
- Information relating to your academic achievement at UWS and your attendance records whilst you are studying with us;
- Information relating to your family or personal circumstances, so we can assess your entitlement to receive a bursary or other financial support from us or to ensure we can provide you with the appropriate pastoral care;

In some cases we may also hold sensitive personal information about you such as:-

- Information regarding any medical conditions or disabilities you may have so that we can ensure we are providing you with support throughout your studies (our Disability Services will provide you with a separate Privacy Notice explaining what we will do with this information);
- Certain [criminal convictions or charges](#), where you are on a programme such as nursing, teaching or social work;
- Information about you racial or ethnic origin, religion or similar beliefs or your sexual orientation.

If we are processing sensitive personal information about you then we will make sure that we will have in place additional safeguards when using that data.

If you are a UKVI sponsored student then we are required to check your attendance and engagement on your programme of study. One way we may do this is by asking you to download an app to your phone which allows you to register your attendance at your on campus classes. You will be provided with further information about this at your first check point with us and can also read more about it on our [website](#). It is not mandatory for you to download the app and your attendance can still be registered by staff if you would prefer this.

### **What are the sources of the information we hold about you?**

We may collect information about you in a number of ways. For example:-

- From details you provide to us before you join the University, for example, when you tell us you may be interested in studying at UWS;
- When you apply to study here and complete an application form via UCAS or one of our other application processes or procedures; or
- When you make contact with us during your studies to make an enquiry, raise a concern or attend one of the student support services we provide.
- From third parties who provide funding for your studies, such as SAAS or the Student Loans Company, as well as your employer or another organisation if your studies are funded by them.

### **How will we use your information?**

We will use the information we hold about you for the following purposes:-

- Making decisions about recruitment and admission to the University;
- Academic matters such as
  - Providing our core teaching, learning services, for example, registration, assessment, managing your progress on your programme of study, graduation, academic misconduct investigations;
  - Maintaining your student record;
  - Providing library services;
  - Assessing your eligibility for financial support from us or from third parties
  - Providing advice and support in academic, pastoral, careers and other services that help us in safeguarding and promoting the welfare of our

students, for example, student counselling services and our careers and employability services. This includes use of student data in our learner analytics dashboard which you can find out more information about on our [website](#)

- Financial matters i.e.
  - Administering fees, scholarships and bursaries and any other payments you may make to us;
- Other administrative purposes, such as:-
  - Dealing with any complaints or enquiries you make
  - Dealing with disciplinary and student misconduct matters
  - Making sure you comply with your Student Visa conditions or relevant immigration status whilst studying with us
  - Carrying out research and statistical analysis
  - Acting on feedback you have provided to us, such as in module evaluation questionnaires;
  - Providing practical support to you during your studies, such as safety advice, providing you with IT support or access to our sporting facilities, and
  - Compiling records and statistic for research and audit purposes and management information.

If you choose to stay in University owned accommodation we will also use the information you provide us with to help us manage your stay with us.

### **Why do we need to process your personal data?**

We may process your personal data for a number of reasons.

In many cases this is because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering in to a contract. For example, when you have enrolled with us we will use your information to ensure we can deliver your programme of study to you.

We may also process your data because it is necessary for the performance of tasks we carry out in the public interest or because it is necessary for our or a third party's legitimate interests. For example, to monitor and evaluate our performance and effectiveness as an institution.

Finally, we may process your personal data because we need to do so to comply with our legal obligations. For example, to administer fees and bursaries or where there is a legal obligation to report a change in your circumstances, such as a change in your course, to UK Visas and Immigration.

### **How long will we keep your information for?**

We will only keep the information we hold about you for as long as we need it.

If you have made an application to us and it has been unsuccessful we will keep a record of your previous applications for eighteen months so that we can use this information to verify your progression since the last time you made an application to us.

There are some cases where we will retain a record of your academic achievements permanently so that we can verify your attendance at UWS should we need to in the future and satisfy our legal obligation to keep certain records for particular periods of time. There is some information that we hold about you that we do not need to hold permanently and in that case we will destroy or delete the information in line with our current records retention schedule. We make sure our records retention schedule is regularly reviewed so that we only hold the data that we need to.

### **Who has access to your information and who will we share your information with?**

There will be times where we may share the information you provide to us with third parties. In some cases this data sharing is optional and you will be given a choice about whether you want us to share your data at the time you provide us with the information. However, in some cases we will not offer you a choice because we have to share your information to ensure we can provide services to you or to make sure we can meet our legal or statutory obligations. We will always make sure that when we share information about you that we do this in line with the legislation and that we only share the minimum amount of information that is needed. The most common data sharing we will carry out is as follows:-

- Our authorised agents and contractors where there is a legitimate reason for us doing so, such as third parties who work with us to provide student support services or organisations offering anti-plagiarism software, such as Turnitin®, on our behalf. This also includes our London campus delivery partner who we share information with to ensure the effective delivery of programmes for our London based students;
- Organisations who have an interest in tracking your progress and attendance, including
  - Student funding bodies and sponsors such as SAAS, local authorities and the Student Loans Company. This would also include sharing information with your employer if they are sponsoring your studies although your employer should inform you that this data sharing will take place at the time they agree to sponsor you.
  - Other educational providers where you are taking part in an exchange programme.
- Professional or Regulatory bodies such as the Nursing and Midwifery Council so that we can confirm your qualifications to them and facilitate the professional registration or accreditation process.
- Crime prevention and detection agencies such as the Police.
- UK Visa and Immigration Directorate.
- Electoral registration officers
- Other educational institutions or work placement providers who we work with in relation to collaborative programme provision.
- External bodies who validate or accredit programmes offered by us

Our social learning platform is called Aula which is provided to us by Coventry University. When we use Aula to support your studies we will provide Coventry University with your first name, last name and email address so that they can set you up with a user account. Once you are registered and use the platform they will also retain details about your internet protocol address. Where assessments are administered in Aula, your marks may also be stored on the Aula platform. You may choose to provide a photograph and other

user profile information which will be stored on the Aula platform, although this is optional and you are in control of the content you provide.”

If you are an international applicant who requires a CAS to be issued to obtain a Student visa, we share your personal data with UK Visas and Immigration, a department of the UK Home Office. We have to do this because it is a legal obligation and we will not be able to act as your immigration sponsor without doing so. If you are on any type of visa category, UKVI may also request information relating to your immigration status.

If you have made your application through one of our approved overseas agents then we will provide information about you to them so that we can process your application. For example, we may advise them about the current status of your application so that they can continue to provide you support through the application process.

In some cases the University may need to verify certain information you have provided to us during your application with third parties named in your application, for example any referee(s) you have given and qualifications you have obtained from awarding bodies if we need to do this then we will only provide information required to identify you and your qualifications record to that third party.

On graduation from the University your details will be passed to Digitary who provide an online platform so that you can access a universally recognised academic transcript (HEAR) and your graduation parchment. We will pass details such as your name, date of birth, the grades and qualifications you achieved, degree award, the date of your award, your Banner ID and your main fields of study to them. They will use this to contact you directly to provide you log-in details to the online platform which will allow you to access your transcript and parchment when you need to in future.

Our accommodation software is provided by TCAS Online Limited. More information about our relationship with this third party supplier is provided later in this privacy notice.

#### Higher Education Statistics Agency (HESA)

Some of the information we hold about you will be passed to HESA. We are required to do this each year. HESA are responsible for the database in which HESA student records are stored. You can click on the following link to find more detailed information about what [information we provide to HESA](#) and what they will do with the information we pass to them.

#### Students' Union

When you enrol as a student you automatically become a member of the Students' Union. We will provide them with the following information so that they can administer your membership: name, your university e-mail address, date of birth, BANNER number, gender and information regarding your programme of study and the campus where you are studying.

If you do not wish to become a member of the Union you can opt out of this when you enrol or you can let us know by e-mailing [hub@uws.ac.uk](mailto:hub@uws.ac.uk) and we will not pass your details to them.

## **What choices do you have in relation to your information?**

Under the legislation you have certain rights in relation to the information we hold about you:

- To obtain access to, and copies of personal data we hold about you;
- To require us to stop processing your personal data if the processing is causing you damage or distress;
- To require us to stop sending you marketing communications;
- To require us to correct any personal data we hold about you that is incorrect;
- To require us to erase your personal data;
- To require us to restrict our data processing activities;
- To withdraw your consent to our data processing activities (without affecting the lawfulness of our processing before you withdrew your consent);
- To receive the personal data that we hold about you, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another 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.

Many of the rights above are not absolute so there may be times when you make a request to us and we are unable to meet it in full but if this is the case we will explain to you fully why we have not been able to do what you have asked. You should also be aware that where our processing of your information relies on your consent and you then decide to withdraw that consent then we may not be able to provide all or some aspects of our services to you.

To find out more detailed information about the rights you have and how you can make a request you can email [dataprotection@uws.ac.uk](mailto:dataprotection@uws.ac.uk).

## **How can you access and update your information?**

We want to make sure that the information we hold about you is always accurate and up-to-date. We can only do this if you let us know about any changes to the information we hold about you. You can do this by accessing the BANNER self-service system or letting Registry know.

## **How will we keep your information safe?**

All personal information we hold about you is held on secure servers. If we hold paper records about you then we make sure that staff are trained about how they should handle this information and make sure it is stored securely.

- [Firewall](#)  
A firewall is a network security device that monitors incoming and outgoing network traffic and decides whether to allow or block specific traffic based on a defined set of security rules.

Rules are designed to provide a balance between strong security and allowing staff and students appropriate access to teach and study.

- [Patch Management](#)  
Patch management is a strategy for managing security fixes or upgrades for software applications and technologies. A patch management plan helps the organisation handle these changes efficiently and in a controlled and fully tested manner. We patch our devices and systems as part of a 30 day rolling process. Critical security patches are installed as required.

- [Access Control](#)  
Access control is a security technique that can be used to regulate who or what can view or use resources in a computing environment.

Access to files and folders and connections to computer networks is based on user credentials, login and password.

- [Event/Network Monitoring](#)  
The UWS network is constantly monitored for anomalous behaviour which would be associated with cyber-attacks. Event monitoring tools help us to monitor details of activity on the network and allow us to highlight areas of concern for further investigation. Identifying anomalies quickly is vital to securing the confidentiality, integrity and availability of data on our network.

- [Anti-Virus](#)  
Anti-Virus protection is installed on all endpoint devices and updated at least daily with the latest vendor updates.

Antivirus software is designed to prevent, detect and remove malware infections on individual computing devices, networks and IT systems.

Our antivirus software programs include real-time threat detection and protection to guard against potential vulnerabilities as they happen, as well as system scans that monitor device and system files looking for possible risks.

We have a contract in place with the third party provider of our accommodation software, TCAS Online Limited, to make sure that they keep any information they process on our behalf safe and secure. Please refer to the [TCAS privacy notice](#) to find out more about this.

### **Does the University carry out any automated decision making using my information?**

Automated decision making is when an organisation makes a decision about you without human intervention. For example, for the assessment of eligibility for financial assistance. The University does not carry out any automated decision making based on the information you provide to us.

### **Do we use your information for any direct marketing?**

There may be times when we send you information about events we are hosting or to promote other opportunities within the University. You will have the right to object at any time to receiving this type of communication from us. If you do object then we will stop processing your information immediately for these purposes.



### **Will we contact you to take part in surveys?**

There will be times when you may be contact to ask that you take part in surveys. We may contact you directly or we may ask third parties authorised by us to contact you on our behalf. For example you will be contacted in relation to the following surveys:

- National Student Survey (NSS)
- Graduate Outcomes survey
- other University-approved student experience or research surveys.

If you do not wish to participate in these surveys then you can let us know by contacting us by e-mail at [hub@uws.ac.uk](mailto:hub@uws.ac.uk).

### **Will we transfer your information outside of the EEA?**

Some of the personal data we hold about you may be transferred to, and stored at, a destination outside the European Economic Area. The most likely time that this will happen is if you are studying with one of our international partners or if you have made your application to us via one of our approved recruitment agents. If we are transferring your data outside of the EEA we will make sure we make you aware of this at the time we are collecting the information from you.

If we do this we will make sure we only transfer the information if there are appropriate safeguards in place.

### **Who is the University's Data Protection Officer?**

The Head of Legal Services is the UWS Data Protection Officer. If you have any concerns about how we handle your personal data then you can contact the Data Protection Officer directly by e-mail [dataprotection@uws.ac.uk](mailto:dataprotection@uws.ac.uk) or by post at Data Protection Officer, University of the West of Scotland, Legal Services, High Street, Paisley, PA1 2BE.

### **How can I complain about your use of my information?**

If you remain unhappy then you have a right to complain to the Information Commissioners Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
e-mail: [casework@ico.org.uk](mailto:casework@ico.org.uk) and telephone 0303 123 1113