

1. Data Controller

University of Northumbria at Newcastle (“we”, “our”, “us”) processes personal data in accordance with our obligations under the General Data Protection Regulations (‘GDPR’) and is a registered Data Controller with the Information Commissioner’s Office (‘ICO’), which is the supervisory authority responsible for the oversight and enforcement of Data Protection Legislation within the United Kingdom.

Registration Number: Z7674926

2. Overview

This privacy notice is a statement that describes how and why we process personal data in relation to any individual (“you”, “your”) making enquiries about, submitting applications to, or enrolling on, any programme of study at any of our locations, including collaborative or foundation programmes, undergraduate or postgraduates (taught or research) programmes offered by us, or our partners, pathway students, degree apprentices, distance learning and CPD (Short Courses). This notice will also apply to any other learning and teaching related activities not listed.

This notice also explains how you might control the use of your personal data in accordance with your rights under the GDPR. You may be given further information about the uses of personal data when accessing specific services and facilities.

3. Where do we get your personal data from?

We may obtain personal data about you from the following sources:

- Direct from you when interacting with us before you join us, for example when submitting enquiries to us or when registering for or attending open days and external recruitment events, whether in the UK, overseas or online
- Direct from you when interacting before you join us, for example when attending outreach work either at Northumbria University or place of study, or at careers fairs directly organised by schools and colleges.
- Direct from you when you submit an application to us or from third parties - UCAS, external recruitment representatives, University regional and country offices overseas, collaborative/partner institutions or organisations.
- From your previous places of study, your employer, Student Loans Company, local authority’s other relevant parties authorised to provide us with your information including placement providers.

Student and Applicant Privacy Notice

- Via transactional activities as part of your learning and teaching (assessments, etc), your engagement with University services (IT systems, email, building access, Student support etc).

4. Categories of personal data are processed by us

To carry out our activities and to manage our relationship with you, we may collect, store, and process the following categories of personal data:

Data Category	Example
Biographical	Name, title, birth date, age, gender, nationality (Country of domicile).
Contact	Address, email address, telephone number.
Administrative	Enquiry records, application records, student number.
Compliance	<ul style="list-style-type: none">• Copies of passports, visas and any other documents required for Home Office compliance.• Health and safety records (assessments, accident reports)
Financial Information (including social and economic)	Banking details, records of payments, applications for funding and loans, debts to us. i.e. appropriate information and documentation required to charge fees or to assess the eligibility to receive loans, grants, scholarships and hardship funds, for example, <ul style="list-style-type: none">• Family or personal circumstances• Financial information• Documentation and supporting evidence
Historical Information	Your education and employment history (places attended or worked). Courses you have completed, dates of study and examination results.

*Sensitive Personal Data (and Convictions Data)	<ul style="list-style-type: none"> Racial or ethnic origin; religious or similar beliefs; and sex life or sexual orientation (Processed for statutory returns or relevant student support services) Health information relating to the provision of advice, support and welfare offered by the Student Support Service, including counselling notes. Health information to facilitate reasonable adjustments or for health and safety assessments Health information for sports membership etc CCTV recordings and data relating to breaches of University regulations Security reports
Information relating to academic journey	Assessments records, timetables, attendance records, details of examinations taken, marks, Personal Extenuating Circumstances, appeals, complaints, final awards etc.
Disciplinary Data	<ul style="list-style-type: none"> Records of any breaches of our policies and regulations, investigations, witness statements, evidence (inc. CCTV) and actions taken. Fitness to practice records of professional students.
Placement Details	Organisation overview, speciality, learning opportunities, service hours & shifts, dress code, facilities, etc.
Photographs, audio or visual recordings	Used for the purpose of, lecture capture or student assessment and the production of student cards.
Emergency Contacts	The person you are providing contact data for
Security Data	To administer building entry, CCTV and system login.

5. Activities we process your personal data for and the lawful basis

Under Article 6 EU GDPR we must identify a basis for the "Lawfulness of processing" of our activities involving of your data. These are broadly described as: 'Consent', 'Contract', 'Legal Obligation', 'Vital Interests', 'Public Interest (or Public Task)' and 'legitimate interests'.

Before you join us, your data is required for the following activities, which have been identified as necessary "*for the performance of our contract with you*" or in the case of potential partners, "*in order to take steps prior to entering into a contract*".

Student and Applicant Privacy Notice

- To register and respond to your enquiries, keep you informed about relevant subjects that you have expressed an interest in and to invite you to events.
- To receive, administer and assess your application, including: invites to assessment days, consideration of relevant declared criminal convictions (or acts of violence), DBS checks and panels, and consideration of your 'good standing' for professional programmes.
- For correspondence relating to your enquiry or application about any relevant associated events or services e.g. open days, student support, accommodation etc.
- Management and administration of your application and registration with University Accommodation services, including the provision of insurance and allocation of rooms.

These further activities have been identified as processing where it is “necessary for the purposes of the legitimate interests pursued by the controller” (us) or you, as an enquirer or applicant, or where you have “given consent to the processing of personal data for one or more specific purposes” which you can withdraw consent for or object to at any time.

- Direct mailing to enquirers/applicants and students in relation to benefits and opportunities offered by or through us, but that are not related to your applications or study:
- University activities and events organised for students in relation to future opportunities.
- Non-study or associated material we think might be of interest to you, for example information on the Students' Union.
- Surveys, feedback and similar communications.
- We may use your data to analyse monitor and evaluate our recruitment effectiveness or other performance and effectiveness in order to maintain and improve our services.
- We may seek your views directly through online questionnaires, invitations to participate in focus groups, telephone or other technology-based surveys. This may also require us engaging a third party to facilitate the work modes for primary research.
- Providing a more personalised user experience when using our website, applications or any other services, allowing us to target you with information we think you might be most relevant to you and your enquiries.

Student and Applicant Privacy Notice

- We may analyse your social media interactions with us to potentially identify other people who may be interested in our services and our qualifications. No data about you is shared externally and this would only be used to provide targeted adverts about us.

Recording Telephone Calls

We may monitor or record phone calls to our admissions team or clearing line in case we need to resolve queries or issues and to help improve our quality of service. Conversations may also be monitored for staff training purposes. Where recording is used, we will keep you informed and will take appropriate measures to ensure that that sensitive data is not recorded.

Upon enrolling with us, you must accept the conditions of the ‘Handbook of Student Regulations’, which along with relevant University policies forms our “contract” with you.

- “the performance of a contract to which the data subject is party”; and/or
- “the performance of a task carried out ... in the exercise of official authority vested in the controller” - namely our public task of delivering Higher Education.

The following activities have been identified as necessary under either of the above:

- Academic administration, including: Registration, provision of study materials, timetabling, academic progress, facilitating professional placements, organising examinations, providing pastoral support, feedback, awards, and the production of transcripts and certificates.
- Administration of policies, including: Appeals, complaints, grievances, disciplinary and misconduct, including any non-compliance with accommodation ‘house rules’.
- Consideration of undeclared criminal convictions, acts of violence, or other relevant matters that become known to us during your studies which may lead to unsuitability for your programmes or placements.
- For the provision of IT Services, including: Accounts, email services, registration with third party systems, hosting of data with third party providers, monitoring of usage, and undertaking investigations in line with the IT Acceptable Use Policy.
- Providing access to, and managing your use of, University facilities and services, e.g. Smart Cards (including photographic image), building access, library membership, access to library systems, building access, car parking, sports facilities etc.

Student and Applicant Privacy Notice

- Monitoring your engagement with learning and teaching activities and systems related to your studies (attendance, Virtual Learning Environment usage etc) to provide learning analytical support.
- Direct mailing in relation to activities related to your studies, including: student benefits and opportunities offered by or through us (or by relevant bodies) activities and events organised in relation to your studies, providing operational information (e.g. IT support, information about building closures etc) or facilitating surveys which we must provide to you as a Higher Education Body.
- Administration, support and delivery of your enrolled programme where the programme is through affiliated colleges, institutions and relevant partnerships, including those outside of the EEA. (NB. All other activities on this list apply to students at these establishments.)
- Processing applications for Access to Learning Fund (ALF) and/or consideration for eligibility for (and award of) the Reasonable Adjustments Access to Learning Fund (RALF).
- The operation of a lecture capture (recording) facility relating to the recording of educational activities e.g. lectures, by us (you will be asked for consent if you are to feature as the subject of the footage/audio).
- Provision of information to external examiners, external reviewer or other relevant external parties required to provide comment or to participate on University convened groups e.g. external professional suitability panel members.
- Research and statistical analysis for internal reporting and review, for example, financial and strategic planning and to evidence compliance with legislation.

Data is also processed for the following activities, which have been identified as necessary *“for us to comply with the law”*:

- For monitoring compliance with and enforcement of relevant policies in relation to health and safety and security (prevention and detection of crime) - including the use of CCTV, and safeguarding.
- Monitoring attendance in compliance with UK Border Agency requirements and for meeting Professional Statutory Regulatory Bodies requirements.
- Production of statistical returns required for third party government bodies e.g. the Higher Education Statistics Agency, for completion of government supported surveys.
- To monitor and promote equality and diversity throughout the university. This may include the production of non-identifiable statistical data for analysis.

Student and Applicant Privacy Notice

These further activities have been identified as processing where it is “necessary for the purposes of the legitimate interests pursued by the controller” (us) or you, as an enrolled student, or where you have “given consent to the processing of personal data for one or more specific purposes” which you can withdraw consent for or object to at any time.

- Administration of prizes, awards and scholarships, including those awarded by external bodies, with whom data may be shared.
- For the production of promotional material used by us and published on our website, in brochures.
- Provision of references to potential employers and other educational institutions.
- Administering and filming congregation ceremonies and the publication of awards lists (you must consent to appear in the published booklet).
- Register you with Newcastle or Gateshead City Councils for the purpose of confirming your exemption from payment of council tax. You will need to present your exemption certificate to the council who will use this data to confirm it is genuine. Without this data being provided, you would need to individually request us to verify you as a student.
- Registering you with Northumbria Students Union so that you may access their support services. Please note data is shared under contract for this purpose only.

In addition to the lawful basis under Article 6, **Article 9** requires an additional condition for processing “special categories (“Sensitive”) of personal data” relating to racial or ethnic origin, political opinions, religious or philosophical data concerning health or data concerning a natural person's sex life or orientation. We process sensitive data only in the following ways:

- In relation to health or other matters in order to protect your vital interests, or those of another person, where you are physically or legally incapable of giving consent”.
- We will seek your explicit consent for the administration of Personal Extenuating Circumstances submissions and late approvals.
- We will seek your explicit consent for DSSR assessments, and the sharing of relevant information to enable reasonable adjustments to be facilitated.
- We will seek your explicit consent for registration with professional bodies related to, or as a requirement of your studies e.g. the NMC for nursing students.

Student and Applicant Privacy Notice

- We may be required to provide data to external lawyers, auditors or insurers in respect of accidents occurring within the institution and where we need to seek advice and services in relation the “establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity”.
- We may refer students exhibiting health related concerns, “for the purposes of preventive or occupational medicine” where we feel that there is a duty of care to intervene and staff require advice from professional support services.
- Under Member (UK) State Law, processing may be required to assist police, local authorities, or other regulatory bodies for taxation purposes or pursuant to the prevention, detection or disclosure of a potential crime.
- Under Member (UK) State Law, processing may be required in compliance with national Safeguarding protocols in the event of concerns for your safety or wellbeing and wellbeing of our students and others.
- Under Member (UK) State Law, processing may be required in compliance with national ‘PREVENT’ duties.
- Under Member (UK) State Law, processing may be required in compliance with regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements.

Please note that the above is not an exhaustive list. Additional processing activities associated with your engagement with us may be required in the event of requests made by a student, an outside agency or as a result of activities undertaken as part of our relationship with a student.

We will endeavour to seek consent to further process where applicable, otherwise processing will only occur where an additional lawful basis can be identified.

Photography

Photographs may be taken at our events for use in communications and marketing materials, including on our website and on social media channels. Where you are not the subject of the image, i.e. if it is a “group” or “crowd” photograph, we may use such images without requiring your consent, however, where you are the subject of the photograph, you will be asked to provide your explicit consent to use the image. Notifications will be put up in and around these ‘open’ events to inform you when such photography is taking place.

You have the right to object or restrict your image being taken or used. If you would like to exercise this right, please contact us as set out below.

Communications

All communication with you, including in relation to updates to this privacy notice, will, where possible be made via the preferred method of communication that you have registered with us.

We will contact you in relation to events that we believe are relevant to you based upon their similar nature to your engagement with us. i.e. if you are a Law student, we may send you information about a Law related event.

If, at any stage, you are concerned about the content (e.g. unwanted marketing), frequency (too many) or method (change preference) of these communications, you can unsubscribe or update your preferences using the link which will be provided at the bottom of the relevant correspondence.

Should you unsubscribe from our marketing messages you will miss regular communications about our services and updates.

6. How personal data is stored securely by Northumbria University

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

All of our employees, contractors and volunteers with access to personal data receive mandatory data protection training and have a contractual responsibility to maintain confidentiality and access to your data is restricted to those members of staff who have a requirement to access it.

We utilise many different storage solutions and IT systems, some of which are outsourced to third party providers. For example, email accounts are provided by the Microsoft Live@Edu service.

Where processing takes place with an external third party, processing takes place under an appropriate agreement outlining their responsibilities to ensure that processing is compliant with the Data Protection legislation and verified to be secure.

Where applicable, any credit/debit card details provided will be stored in full compliance with PCI-DSS requirements.

7. Sharing your Personal Data with Third Parties

Where there is a legitimate or lawful (including statutory) reason to do so, we may disclose limited personal data to the following third parties:

- Companies acting as 'data processors' under contract, to deliver functions on our behalf (e.g. IT hosting, car parking, market research, recruitment and delivery support, etc).

Student and Applicant Privacy Notice

- The Higher Education Statistics Agency ([HESA](#)) for statistical returns and for the “Destinations of Leavers from Higher Education” ([DLHE](#)) questionnaire / Graduate Outcomes Survey. The Office for Fair Access* ([OFFA](#)) and the Office for Students (OfS) for the completion of government supported surveys, to [UNistats](#), Health Education England ([HEE](#)), Education and Skills Funding Agency [[ESFA](#)], the Higher Education Funding Council for England ([HEFCE](#)) for the purposes of the National Student Survey ([NSS](#)). The Longitudinal Educational Outcomes (LEO) and the Looked After Students returns to LAS. The UK Research Councils.
- Continuing Professional Development (CPD) at Northumbria who have their learning funded by HEE requires some personal data to be shared with your employer and HEE to demonstrate that we are meeting our contractual obligations.
- Student Loans Company for the administration of your loan and for the management of associated issues or investigations (for example requests relating to enrolment, periods of attendance). <http://www.slc.co.uk/>
- Sponsors and funding bodies (including employers and overseas bodies) where there is a requirement to confirm periods of attendance, assessment results and similar information. We will seek evidence in individual cases for any prior agreement between you and the sponsor.
- For London Students, and QA Pathway students, relevant data will be processed by staff working for our Joint Venture partners QA HE Limited.
- For Amsterdam Students, we share limited data with Amsterdam University Applied Science for facilities management (building access and access to services) and VISTRA for the provision of financial services.
- For Distance Learning Students, we share data with our data processing partners Pearson for the purpose of their providing support to you via our dedicated Northumbria DL Student Success Team
- Other educational institutions and organisations involved in the delivery of our programmes, e.g. affiliated colleges, exchange institutions, including those outside of the UK and sometimes the EEA.
- Placement providers to ensure that applications and attendance on placement runs smoothly and correctly, and to monitor and assess your progress.
- Northumbria Students Union for the provision of services offered to support students (including for disciplinary cases), access clubs and societies, to enable the democratic process in elections and to promote student engagement.
- Local Authorities in relation to verifying Council Tax exemptions.

Student and Applicant Privacy Notice

- Adult or Children's services as defined by national Safeguarding protocols in the event of safeguarding or 'PREVENT' related concerns or allegations. This may result in sharing with relevant multi-agency Safeguarding and/or Channel Panel.
- University Accommodation Management partner **Sodexo Living** and to the Accommodation Insurers for the provision of personal property insurance.
- Representatives working on our behalf for the purpose of marketing and promotion of the University; and 'in country' student support.
- UK Visas and Immigration (UKVI) and Home Office for compliance reasons. E.g. We are obliged to inform of failure to attend as appropriate or of any interruptions to the period of study.
- Relevant **Professional Bodies** associated with your programme in order to confirm your enrolment on the course and/or your final qualification.
- Debt recovery agencies appointed by us where internal University procedures have failed to recover outstanding debts.
- To the Office of the Independent Adjudicator ([OIA](#))
- External auditors, insurance providers or appointed legal representation.
- The police, local authorities or relevant government departments, without the student's consent if it is deemed necessary, for the prevention or detection of crime or the collection of taxes.
- Higher Education Achievement Record (HEAR) for recording your achievements. This is hosted externally by [Gradintel](#).
- External parties and to external participants on professional suitability panels.
- [Turnitin® UK](#) system requires a limited amount of personal data including names and email addresses and course details.
- We sometimes uses images taken around campus or at events in promotional material and on our website.
- Potential employers and other educational institutions requesting a reference or verification of grades for current or past students.
- To Sport England's [Higher Education Sport Participation and Satisfaction survey](#) in partnership with TNS-BMRB, an independent research company. Students' University email address is all that is needed for the survey, no other information about an individual student is supplied.

- To Northumbria University [Alumni Association](#) upon completion of studies.

Any other disclosures that may be required but not listed above will be in accordance with your rights and the requirements of the GDPR.

Parents and/or Guardians

Information held about you will not be disclosed to parents and/or guardians without your prior consent, unless your life or health is threatened. In these cases, if it is judged to be in your “vital interests”, we may contact your emergency contact. It is your responsibility to inform us of your emergency contact and keep it up to date..

8. Transfers to third party countries

If you are applying from, or if your course involves any period of study or employment with an organisation in a country outside of the European Economic Area (EEA) (known as ‘Third Party Countries’), we may transfer your data to them to support this.

Some of our partners, IT services or suppliers are also hosted by organisations either in third party countries, or who may back up their data to locations based in third party countries.

Where data is shared with third party countries, we ensure that these countries are either approved by the European Commission as having ‘adequate protection’ or we put in place ‘appropriate safeguards’ and contracts with these organisations, so as to maintain the security of the data and your rights under relevant Data Protection legislation.

There may also be limited sharing with organisations in third countries under specific exemptions, for example, with your explicit consent.

9. Automated individual decision making, including profiling

We use limited ‘**Profiling**’ (where information about you is used to tailor goods or services based on your interests, movement or records of your activities) for Learning Analytics. You will be asked if you wish to participate in the learning analytics process (by consent) to receive tailored advice about how you can enhance your learning. We may use your data (but not engage with you) as part of learning analytics under legitimate interests.

10. How long personal data held by Northumbria University

Your data is held in compliance with Northumbria University’s [retention schedule](#), which is published on our [website](#). This can be summarised as:

When you make an enquiry to us, we will keep a record of it for 3 years so support any subsequent application. For unsuccessful applicants we will retain your data for 1 year following the completion of your application.

For student data. 'Core Information' (used to provide your transcripts, certificates, replacement certificates, validate your studies at any time in the future) is retained for 80 years, whilst other information will be disposed of 6 years after the end of our relationship (unless otherwise stated) for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than if required to do so for legal reasons, or for limited research or statistical purposes for which it will be anonymised. If we do, we will make sure that your privacy is protected and only use it for those purposes.

11. Your Rights under GDPR

Under the GDPR, you have [a number of rights](#) in relation to the processing of your personal information, each of which may apply to differing degrees' dependent upon the nature of the processing and the legal basis for it. You have the right to:

- [Be informed as to how we use your data \(via this privacy notice\)](#)
- [Request access \(a copy\) of the personal information that we hold about you.](#)
- [Correct inaccurate or incomplete data](#)
- [Request that we stop sending you direct marketing communications.](#)

In certain circumstances, you may also have the right to:

- [Ask to have certain data 'erased by us.](#)
- [Request that we restrict certain processing of your personal data.](#)
- [Request that we provide any data you submitted to us electronically be returned to you or passed to a third party as a data file.](#)
- [Object to certain processing of your personal data by us](#)

In some cases, there may be specific exemptions as to why we aren't able to comply with some of the above. Where this is the case, we will explain the reasons why.

- For more information about any of the above please see the [GDPR pages of our website](#).
- In order to exercise any of the above rights, please contact the Data Protection Officer (*details below*).

12. Data Protection Officer

Student and Applicant Privacy Notice

The Data Protection Officer (DPO) for Northumbria University is Duncan James. Contact the DPO if you would like to:

- Receive a copy of your data.
- Have any questions you feel have not been covered by this Privacy Notice
- Have any concerns about the processing of your data
- Wish to make a complaint about the processing of your data

You can email at dp.officer@northumbria.ac.uk or call +44 (0)191 243 7357

13. Lodging a Complaint with the Information Commissioners Office (ICO)

If you are dissatisfied with our processing of your data, or a response to a complaint you have made to us about it, you have the right to complain to the ICO.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113 (local rate) or 01625 545 745

For more information see [Information Commissioner's web site](#).

14. Changes to this privacy notice

We keep this privacy notice under regular review and will communicate any significant updates to you. This privacy notice was last updated in May 2018 and will be reviewed annually.