

# Student Privacy Notice

## 1. Data Controller

The University of Northumbria at Newcastle (“we”, “our”, “us”) is registered with the Information Commissioners Office as a Data Controller - Registration Number [Z7674926](#). We are committed to processing personal data in accordance with our obligations under the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any related UK data protection legislation.

## 2. Overview

We are required to process certain categories of personal data about students in order to process their enrolment, provide access to our facilities, fulfil our contractual obligations and to deliver our public task of providing Learning and Teaching services.

This privacy notice describes the type of data we may process about individuals (“you”, “your”) enrolled on any programme of study offered by Northumbria University along with how and why we process it. It also provides details of how you can exercise your rights under GDPR.

## 3. Where do we get your personal data from?

Your personal data will initially have been provided to us when you first contacted the University as an enquirer, as a direct applicant, or as an applicant via a third party such as:

The University and Colleges Admission Service (UCAS).
Third party recruitment representatives acting on our/your behalf.
Collaborative or Partner Institutions where we act as the awarding body for your course.
Your current or potential employer, for example for Continuing Professional Development courses or Degree Apprenticeships.
The Student Loans Company, your sponsor, local authorities, or other relevant parties authorised to provide us with your information.
The Home office, the Police or Criminal Records Agency, or from other government third parties in relation to your status as a home or international student.

As an enrolled student, we will continue to receive data from you through your interactions with us and we will generate data about you through your studies, your use of University resources, services and systems. We may also continue to receive information about you from some of the third parties listed above, or from other third parties such as:

Organisations providing you with workplace-based placements,
From professional bodies associated with your professional registration.
External health and social care professionals who may alert is if there is a consent about your welfare or wellbeing.
Organisations or individual acting on your behalf authorised to share information with us.

## 4. Categories of personal data we process

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

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Biographical information such as your name, date of birth, nationality, relevant identity numbers including passport or your assigned student number.
Contact information such as your, home and term time address, phone number, email or other online identifiers.
Detail of your next of kin or emergency contacts
Educational and employment history such as academic qualifications, references and work experience.
Immigration, passport and visa information.
Funding and financial information including bank details, sponsors, scholarships. billing and payment records.
Information about your family, your dependents, whether you are a care leaver, your personal circumstances, your income, where this is relevant to the assessment of your suitability to receive grants or bursaries
Records of interactions with our services, building entry and financial transactions
Record relating to your academic work, assessments, feedback marks, progression and award
Record of timetabling, attendance, IT monitoring and engagement and absence - including any suspension or exclusion information
Information relating to extenuating circumstances, deferrals, extensions, appeals, complaints and disciplinary.
Photographs and visual images
Audio or video recordings produced as part of your learning and teaching engagement in accordance with the University lecture capture policy.
Other legitimate personal data relating to academic, pastoral support and careers advice.
Special Category Data is defined as information in relation to an individual's - racial or ethnic origin; religion; political views; trade union membership; genetics and biometrics (where used for ID purposes); health and disabilities or sex life and sexual orientation

### 5. The lawful basis for processing your data

The first principle of the General Data Protection Regulation (GDPR) requires that whenever an organisation processes personal data, it must be processed 'lawfully, fairly and in a transparent manner'. This requires is to identify a lawful basis under Article 6 GDPR and Article 9 GDPR for special Category Data such as:

Article	Description
6(1)(a)	With your consent to process your data, for example if you engage with a specific service. Where we rely on consent this will be made clear to you and you are free to decide whether to provide this data with no consequences if you choose not to.
6(1)(b)	Processing is necessary for the performance of our contract with you as a registered student (or in order to enter into a contract). Without this information we would not be able to process your data to provide the contracted services or provide the support necessary to fulfil that contract.
6(1)(c)	Some processing is necessary to because we have a Legal obligation to do so, for example for the prevention and detection of crime or fulfil our statutory compliance and regulatory obligations.
6(1)(d)	To protect you vital interests or those of another person, where you are physically or legally incapable of giving consent

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6(1)(e)	Where "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"  We classed as public authority for the purposes of data protection law with the right to process personal data in order to carry out our public interest task as a university, such as providing higher education services, conducting research and the ancillary operations that help us deliver education and research. We rely on 'public task' as the lawful basis of processing where the processing is in relation to the University acting in the capacity of a public authority.
6(1)(f)	We may process your data in order to meet our legitimate interests or to meet the legitimate interests of others, including you, but only where to do so will not infringe on your rights.
9(2)(a)	With your explicit consent to process special category data your data. Where we rely on you are free to decide whether to provide this data. There will be no consequences if you choose not to and you may later withdraw consent.
9(2)(c)	To protect you vital interests or those of another person, where you are physically or legally incapable of giving consent, for example we may share health related information.
9(2)(f)	Where processing is necessary in relation to legal claims.
9(2)(g)	We may need to process special category data if the processing is necessary in the substantial public interest and there is a basis to do so in law
9(2)(h)	For some professional courses such as nursing, processing may be is necessary for the purposes of occupational health.
9(2)(j)	We may process special category data for archiving, scientific or historical research purposes or statistical purposes, where there is a basis to do so in law

### 6. The activities for which we process your data

Activity	Legal Basis
Academic administration, including: Provision of study materials, timetabling, academic progression, facilitating, organising examinations and assessments (including filming where appropriate), providing pastoral support, feedback and the production of transcripts and certificates	6(1)(b) & 6(1)(e)
Administration of work-based placements and professional placements.	6(1)(b) & 6(1)(e)
Administering tickets for congregation ceremonies and for filming and the publication of you name in awards lists and booklets.	6(1)(a) & 6(1)(b)
Administration of alumni membership	6(1)(a)
Administration of external and internal student surveys, including collection of feedback on specific services such as the Library, Computing Services and the Careers Service. We may engage a third party to facilitate these.	6(1)(a), 6(1)(e), 6(1)(f), 9(2)(a) & 9(2)(g)
Administration of prizes, awards and scholarships, including those awarded by external bodies with whom data may be shared with consent	6(1)(a) or 6(1)(e)
Administration of University facilities and services, e.g. Issuing smart cards (including photographic image), monitoring building access, library membership, access to library systems, building access, car parking, sports facilities etc.	6(1)(b) & 6(1)(e)
Analyse monitor and evaluate our performance and recruitment effectiveness in order to maintain and improve our services.	6(1)(a), 6(1)(e) or 6(1)(f)

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As strictly necessary and allowed by law, to assist UK agencies with duties relating to the prevention and detections of crime, apprehension and prosecution of offender, collection of a tax or duty, or safeguarding national security	6(1)(c) & 9(2)(g)
Assessing any relevant unspent criminal convictions (e.g. physical or sexual assault, firearms, arson or drugs) or allegations that we become aware of about you as an enrolled student that may identify risks to other members of the University and/or identify appropriate support measures for you	6(1)(b), 6(1)(e) & 9(2)(g)
Collection and processing of tuition fees and recovery of unpaid fees, including referring debts to a third parties for the recovery of debts.	6 (1)(b)
Completion of government supported surveys (e.g. the National Student Survey, the Destination of Leavers in Higher Education Survey, the Graduate Outcomes Survey and the Teaching Excellence Framework) and monitoring for equality and diversity compliance.	6(1)(a), 6(1)(c), 6(1)(e), 9(2)(a) & 9(2)(g)
Consideration of criminal convictions, acts of violence, or relevant matters which may lead to unsuitability for your course, placement or student status.	6(1)(b), 6(1)(e) & 9(2)(g)
Details of your registered GP Surgery or health support network	6(1)(a)
Direct mailing related to your studies, student benefits and opportunities offered by us, by relevant bodies, events related to your studies, operational information (e.g. IT support, building closures etc) or facilitating surveys.	6(1)(a), 6(1)(e) & 6(1)(f)
Disclosure and Barring Service (DBS) checks on courses leading to professional qualifications exempt from the Rehabilitation of Offenders Act.	6(1)(b), 6(1)(e) & 9(2)(g)
Enrolment Administration and verification of identity.	6(1)(b) & 6(1)(e)
Fitness to practice investigations, panel hearings and sharing the outcomes with recognised and registered professional bodies.	6(1)(b), 6(1)(e) & 9(2)(g)
For research students only, to record the individual's research activities in the research tool PURE. A profile page is published on the University website from the information recorded in PURE	6(1)(a), 6(1)(e)
For the provision of insurance services and/or Insurance Claims	6(1)(a), 6(1)(b) or 6(1)(f) or 9(2)(a)
For the purposes of Occupational Health Assessments for relevant professional courses where they are a requirement.	6(1)(b), 6(1)(e), 9(2)(h) & 9(2)(g).
Information relating to the prevention and detection of crime, and the safety and security of staff and students, including, but not limited to CCTV recording.	6(1)(e) & 9(2)(g)
Monitoring of student attendance, submission of assessments and engagement with learning and teaching activities (including online) related to your studies, including for compliance with UK Border Agency requirements* and for meeting Professional Statutory Regulatory Bodies requirements.	6(1)(e), *6(1)(c) & 9(2)(g)
Personalising user experience of our website or apps and tailoring the information for you. This may include analysing social media interactions and communications with us in order to promote our services and tailoring our marketing and advertising to you and to others.	6(1)(a) & 6(1)(f).
Processing applications for Access to Learning Fund (ALF), the Reasonable Adjustments Access to Learning Fund (RALF) and granting financial awards such as prizes, scholarships and bursaries.	6(1)(a), 6(1)(b) & 9(2)(a)
Production of statistical returns required for third party government bodies, and compliance monitoring under the Equality Act 2010 and to help us understand our student population to help us ensure policies and practices do not disadvantage minority groups and (equal opportunities monitoring).	6(1)(c), 6(1)(e) & 9(2)(g)

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Provide Educational Analytical support (with consent to participate) and monitoring of student attendance, submission of assessments and engagement with learning and teaching activities (including online) and engagement with University services to provide Educational Analytical support (with consent to Participate).	6(1)(a) & 6(1)(e)
Recording (audio and/or video) lecture capture for educational activities e.g. lectures.	6(1)(a)
Recording and reporting as required to fulfil the University's Prevent duty	6(1)(c), 6(1)(d), 9(2)(c) & 9(2)(g)
Registering you and sharing your qualifications with recognised professional and regulatory bodies.	6(1)(a) or 6(1)(b) or 6(1)(e)
Research and statistical analysis for internal reporting and review, for example, financial and strategic planning.	6 (1)(e)
The provision of facilities, IT Services, University apps, email, registration with third party systems, hosting data, monitoring usage, and undertaking investigations.	6(1)(b) & 6(1)(e)
To arrange visits and trips associated with your studies, including field courses	6(1)(a), 6(1)(e) & 9(2)(a)
To contact you or your identified next of kin in case of an emergency	6(1)(a), 6(1)(d); 9(2)(a) or 9(2)(c)
To facilitate Personal Extenuating Circumstances (PEC) submissions, late approvals, appeals, complaints, grievances, disciplinary, misconduct hearings.	6(1)(a), 6(1)(b), 6(1)(e), 9(1)(a) & 9(2)(g)
To monitor and record incidents related to health and safety law and for safeguarding purposes.	6(1)(c) & 9(2)(g)
To process and respond to requests for information, as required by law (e.g. Freedom of Information or data protection legislation)	6(1)(c) & 9(2)(g)
To provide careers and employability advice, including after graduation) and to be able to facilitate HESA's Graduate Outcomes Survey and necessary for statistical purposes (HESA's analysis of graduate employment outcomes).	6(1)(a), 6(1)(b) & 6(1)(e)
To provide immigration welfare support services for international students including applications for visa extensions.	6(1)(c) & 6(1)(e),
To provide references and confirm qualifications	6(1)(a)
To provide student support services, counselling and mental health support, wellbeing and disability support, conducting DSSR assessments to facilitate reasonable adjustments to support your studies, provide building access, ensure your physical health and safety.	6(1)(a),6(1)(b), 6(1)(c), 6(1)(e), 9(2)(a) & 9(2)(g)
To share basic contact details with the Student's Union to enable you to register for membership, access services and participate in their democratic activities.	6(1)(3) & 6(1)(f)
To share confirmation of study details with the council for the purpose of its assessing and collecting of Council Tax	6(1)(f)
To share course progression data and student support data with educational partners involved in joint course provision.	6(1)(b) & 6(1)(e)

### 7. Sharing your Personal Data with Third Parties

We do not sell your data to any third parties.

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We may disclose certain personal data to external bodies, as categorised in the table below, only where we have a legal basis to do so, and in accordance with the provisions and obligations of UK data protection law.

<b>Transfer To</b>	<b>Purpose</b>
<ul style="list-style-type: none"> <li>• The Higher Education Statistics Agency (HESA) See <a href="#">Privacy Notice</a></li> <li>• The Office for Students (OfS), See <a href="#">Privacy Notice</a></li> <li>• Health Education England (<a href="#">HEE</a>),</li> <li>• The Education Skills Funding Agency (<a href="#">ESFA</a>)</li> <li>• The Higher Education Funding Council for England (<a href="#">HEFCE</a>)</li> <li>• Looked after Students returns to <a href="#">LAS</a>.</li> <li>• The UK Research Councils</li> </ul>	<p>Data will be passed to Higher Education bodies to fulfil our statutory or regulatory functions.</p> <p>HESA will also conduct the Graduates Outcomes Survey approximately 15 months after your graduate.</p>
UK Visas and Immigration ( <a href="#">UKVI</a> ) and Home Office	To fulfil the University's legal obligations as a visa sponsor and comply with our Tier 4 sponsor licence and all associated immigration regulations and responsibilities
Student Loans Company/Student Finance England ( <a href="#">Privacy Notice</a> ) and other funding bodies including NHS Business Services Authority.	For verification of your enrolment and the contractual administration of your payments
Sponsors and private funding bodies including employers and overseas bodies.	In accordance with the terms of their contract with you, or with your consent, we will confirm periods of attendance, assessment results and similar information.
Government agencies and authorities with official duties for the apprehension and prosecution of offenders, collection of a tax or duty, or safeguarding national security	Where it is permitted under UK law in order to assist the requesting body fulfil their statutory duties.
Disclosure and Baring Service ( <a href="#">DBS</a> )	To carry out statutory checks as required for students on courses leading to professional qualifications exempt from the Rehabilitation of Offenders Act.
Placement providers	To ensure that the applications and provisions of your placement can be arranged, to monitor attendance, and to monitor and assess your progress, and deal with any disciplinary matters.
Occupational Health Providers	To carry out statutory Occupational Health assessments as required for students on courses that require them for placements
Educational institutions and organisations, we have partnered with to deliver our courses.	London Campus Students, and QA Pathway students - data will be processed by staff working for our Joint Venture partners QA HE Limited.
	Amsterdam Campus students - we share limited data with Amsterdam University Applied Science for facilities management (building access and

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	access to services) and VISTRA for the provision of financial services.
	Distance Learning students - we share data with our data processing partners Pearson for the purpose of their providing.
	We will share information about students at other Joint Venture institutions involved in the delivery of our courses.
Companies acting as 'data processors' under contract to the University.	The University may engage external companies to deliver functions on our behalf, for example cloud storage analytical services. They will only process data for the purpose for which we have engaged them and will not process your data in any other manner.
Representatives working on our behalf for the purpose of marketing and the promotion of the University and conducting surveys on our behalf.	The University may engage external companies to deliver marketing functions on our behalf. They will only process data for the purpose for which we have engaged them and will not process your data in any other manner.
External examiners or external reviewers.	To evaluate assessments and help ensure fairness and consistency in the assessment process
Relevant Professional Bodies associated with your programme (e.g. Royal College of Nursing, Law Society, Ofsted)	To confirm your enrolment on the course and to register your membership with the professional body. To facilitate professional suitability and Fitness to Practice investigations or to confirm your final qualification.
External participants on professional suitability panels or other relevant external parties	Required to provide comment or to participate in University convened groups.
Potential employers or providers of education whom you have consented for us to pass information to	To act as referees on your behalf, or to confirm your qualifications.
Adult or Children's services as defined by national Safeguarding protocols.	In the event of safeguarding or 'PREVENT' related concerns or allegations we have a legal obligation to sharing information with relevant multi-agency Safeguarding and/or Channel Panel.
Financial Institutions including Brokers, Banks, Building Societies, BACS and other related payment processing services such as Barclays and Western Union	For processing contractual financial transactions.
Newcastle or Gateshead City Councils (and other local authorities upon request)	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.
Continuing Professional Development (CPD) at Northumbria funded by Health education England (HEE)	We are required to share data of Students who have their learning funded by HEE with your employer and HEE to demonstrate that we are meeting our contractual obligations.
The Health and Safety Executive	Reports of accidents/incidents, as required by law



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Plagiarism detection provider <a href="#">Turnitin® UK</a> and other academic institutions.	To identify instances of collusion and plagiarism academic misconduct.
Northumbria Students Union which operates as a separate legal entity to the University. ( <a href="#">Privacy Notice</a> )	To enable student Union membership and provide you with access to their facilities and services.
External solicitors, brokers or insurers in respect of potential claims against the institution.	Where we need to seek advice and services in relation to the “establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity”.
University Accommodation Management partner Sodexo Living (see accommodation <a href="#">Privacy Notice</a> )	For the provision of accommodation services.
External parties such as solicitors, debt recovery agents, tribunals and Courts.	Where internal University procedures have failed to recover outstanding debts.
The Office of the Independent Adjudicator ( <a href="#">OIA</a> )	To enable them to review any complaints you submit to them about us.
Sport England’s <a href="#">Higher Education Sport Participation and Satisfaction survey</a>	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.
Northumbria University <a href="#">Alumni Association</a> upon completion of studies.	To register you with the association.
Charitable Trusts and organisations	Students who have applied for financial assistance may be asked to consent that personal data is shared in order to support or verify their application statement
External bodies offering awards and prizes	Students who are eligible for an award from an external body may be asked to consent that personal data is shared in order to be considered
Companies who develop business intelligence tools for the University such as Civitas and JISC	For the purposes of conducting data analytics. Anonymisation processes will be applied to your data unless you actively consent to participate
To External Auditors	To allow them to review compliance with regulations and to ensure our effective operations.
Any other disclosures that may be required but not listed above will be in accordance with your rights and the requirements of the UK Law.	

### Degree Apprenticeship Students Only

In addition to the processing listed in Section 6 and the table above, we may further share your data with your employer as follows:

Activity	Legal Basis
Details of your attendance, academic progress, marks and Off the job percentages.	6(1)(b)



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General progress, support offered and/or in place and action plans.	6(1)(b)
Outcomes of academic misconduct investigations and other information required for reporting against key performance indicators.	6(1)(b)
Disability and student welfare issues	6(1)(a) & 9(2)(a); or 6(1)(d) & 9(2)(c)
If you are enrolled on the Police Constable Degree Apprenticeship, we will also share Disability and student welfare issues with your employer where it may have an impact on your performance as an Officer.	6(1)(b), 6(1)(e) & 9(2)(g)
Other information outlined to you within the commitment statement	

The following information will also be shared for Degree Apprenticeship Students with **External End Point Assessment Organisations** so that they can administer and undertake the end point assessment and report outcomes to the ESFA to claim your apprenticeship completion certificate.

Activity	Legal Basis
Biographical details (name, address, DoB, unique learner number). Name of employer. Hours contracted to work, Off the job hours – total completed at end of programme, Degree outcome and classification and your English and maths qualification certificates	6(1)(b) & 6(1)(e)

### COVID-19 – All Students

We may be required to provide Public Health England limited information about your use of certain campus facilities and your contact details to support the fight against COVID-19. Information about this can be found in our Test and Trace Privacy Notice published on our [website](#)

We will not disclose anything to parents and/or guardians without your consent, unless your life or health is threatened, in which case if it is judged to be in your “vital interests”, we may notify your emergency contact.

### 8. 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. Business Continuity and Disaster Recovery strategies are designed to safeguard the continuity of our systems and the data they hold.

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.

We utilise many different storage solutions and IT systems, some of which are outsourced to third party providers. Where processing takes place with an external third party, processing takes place following a review of their capacity to securely store personal data and under an appropriate agreement outlining their responsibilities to ensure that processing is compliant with the Data Protection legislation.

All employees, contractors and volunteers with access to personal data receive mandatory data protection training on an annual basis and have a contractual responsibility to maintain confidentiality. Access to your data is restricted to those members of staff who have a requirement to access it. Where applicable, any credit/debit card details provided will be stored in full compliance with PCI-DSS requirements.

### *Remote Working During the COVID-19 Pandemic*

In accordance with government guidance and in order to protect the health and safety of our staff and student, some of our activities will be operated remotely. This means that staff may be accessing personal information from home to deliver our services.

Staff remain subject to all relevant security procedures and policies and will only be accessing data remotely, not removing it to personal devices. This means that your data will not leave our systems and it always remains secure and confidential.

## 9. Transfers to countries outside of the European Economic Area (EEA)

Some Partners and IT services providers are based in countries outside of the EEA. We only transfer data to outside the EEA where “appropriate safeguards” are put in place through contract, where the European Commission has agreed that data protection provisions of a country offers adequate levels of protection; or where you have given your explicit consent.

## 10. 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 Educational Analytics. You will be asked if you wish to participate in the process and will receive tailored advice about how you can enhance your learning. We may collect and use data (but not engage with you) as part of learning analytics under legitimate interests.

## 11. How long is personal data held by Northumbria University

We will retain your personal data for as long as it is required to fulfil the purpose for which it is held and then to fulfil any legal requirements. Details of the retention periods for each type of processing activity is detailed in our retention schedule which is available on our [website here](#). This can be summarised as:

- Enquiry records will be kept for 3 years to support any subsequent application.
- Unsuccessful applicant’s data will be retained for 1 year following the completion of your application.
- Successful applicant data will be classed as ‘Student data’ where ‘Core Information’ (used to provide your transcripts, certificates, replacement certificates, and validate your studies at any time in the future) is retained for 80 years.

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

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

### 13. Data Protection Officer

The Data Protection Officer (DPO) for Northumbria University can be contacted via email at [dp.officer@northumbria.ac.uk](mailto:dp.officer@northumbria.ac.uk) or you can call +44 (0)191 243 7357

### 14. 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, and Telephone: 0303 123 1113 (local rate) or 01625 545 745 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

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