

Student Data Collection Notice

How the College uses student personal data (fair processing notice)

Royal Holloway and Bedford New College, also known as Royal Holloway, University of London, will act in accordance with the UK General Data Protection Regulation ('UK GDPR') and the Data Protection Act 2018 when controlling and processing your personal data.

This notice applies to prospective and current students. We may collect the following personal data about you. You may have provided this to us directly or this information may have come from a third party such as through your UCAS application.

We keep this notice under regular review. This notice was last updated on 21 December 2020.

Category of personal data	Description of items which may be contained within the category
Personal and family details	Name; address (term-time and home); email address (personal and College); telephone numbers; gender; date of birth; health information; ethnicity; sexual orientation; gender identity; disability; religion; emergency contact details; visa information
Education records	Previous educational establishments; qualifications; references
Study record and study engagement	Timetables; programme and course information; personal tutor; attendance records; assessment information; library engagement; technology enhanced learning software; extension and extenuating circumstances information
Careers and employment details	Previous employment; careers aspirations; event attendance
Student life engagement	Accommodation information including Hall Life; sports; volunteering; disability, dyslexia and wellbeing support; counselling;
Financial information	Course fees; accommodation fees; fee residence status; student loan information; bursary or scholarship status and payments; banking information
Criminal convictions or offences	Information relating to the offence or conviction; DBS disclosure; records of consideration by the College
Visual images	Photograph on College Card and College systems; any images taken for promotional purposes
College processes	Information provided during the appeals; complaints; suspensions of regulations or disciplinary processes

Why do we collect this data and what is our legal basis for doing so?

Academic purposes – so that we can provide you with all aspects of College's services in relation to your degree programme.

The Royal Holloway and Bedford New College Act 1985 says that the College exists to deliver undergraduate and postgraduate degrees. This provides us with one of the legal bases to process

your personal data – the performance of a task carried out in the public interest, namely the provision of higher education.

In order to carry out this task, we will use your information for the following reasons:

- Enrolment, including Visa and DBS checks
- Administration of degree programmes
- Performance and attendance monitoring
- Assessment and examination management
- Confirmation of awards, including the publication of awards and pass lists
- Provision of access to services related to your studies including, IT, Library, study support and Careers
- Administration of appeals, complaints and academic misconduct matters
- Research students: Administration of research at the College

Administrative purposes – so that we can provide you with additional services which you have entered into a contract with us to obtain or administer parts of the contract relating to your education.

Your experience at Royal Holloway isn't limited to your studies and you enter into a number of contracts with the College in order to access additional services such as halls of residence, catering, and some of the facilities provided by Active Lifestyle and Sport.

We will use your information for the following reasons:

- To communicate with you once you hold an offer to study with the College so that the enrolment process can take place.
- To process your application for a room in our halls of residence. If you require a room based on a medical condition or disability we will also need to process data relating to this and your explicit consent to do so.
- To process the payment of fees including those for tuition, accommodation and individual course-related activities. Your data will also be processed for the purposes of recovery of those fees in instances of non-payment.
- To issue you with a College Card for the purposes of identification, access to the Library and other areas of campus and use of your Campus Account.

Criminal convictions data – in certain circumstances we will ask you to provide information about unspent criminal convictions. This will occur when you apply for a course offered by the College which leads to a regulated profession and when you apply for a place in College-owned accommodation. You will receive further information about this declaration when you are asked to make it.

We ask for this information in order to prevent or detect unlawful acts and to protect vulnerable staff and students.

Legal obligations, vital interests, legitimate interests and tasks in the public interest

We are required to process your personal data in order to comply with a number of legal obligations to which we are subject, so that we can perform certain tasks which are in the public interest (such as the provision of higher education), and occasionally in ways which are in our or another party's legitimate interest (such as facilitating our relationship with you after graduation or providing financial support). In some cases we can only process your data with your consent (for example when you complete surveys or when you tell us about your health, sexuality or any of the other categories of personal given special consideration under ('UK GDPR')).

We will use your data in this way for the following reasons:

- The production of statistical returns to third parties such as the Higher Education Statistics Agency
- Monitoring compliance with equalities legislation
- Adding you to our alumni database after graduation
- Administration of scholarships, bursaries, grants, financial awards and financial aid
- Provision of disability support and counselling services
- Use of CCTV, ANPR and Body Worn Cameras
- Administration relating to health and safety
- Administration relating to internal and external surveys such as the NSS, PTES and PRES
- Monitoring trends in study choices and study engagement to identify improvements to the services the College offers to students.

Who do we share your personal data with?

The College may disclose appropriate personal data, including sensitive personal data, to third parties, where there is legitimate need or obligation, during or after your period of study. Such disclosure is subject to procedures to ensure the identity and legitimacy of such agencies.

The College may use third party companies as data processors to carry out certain administrative functions on behalf of the College. If so, a written contract will be put in place to ensure that any personal data disclosed will be held in accordance with data protection legislation and have appropriate security measures in place.

We do this on the following grounds:

- **to perform a contract** the College has entered into with you or take steps before entering into a contract with you at your request (for example, your student contract)
- **to comply with the College's legal obligations** (for example, complying with immigration, health and safety and safeguarding laws, preventing and detecting crime, assisting the police and other authorities with their investigations)
- **where necessary for our legitimate interests** or those of a third party provided your interests and rights do not override those interests (for example, maintaining academic standards, recovering debt, managing insurance claims, communicating with students and offer holders about benefits, services, activities and events)
- **to protect your vital interests** or those of another person (for example, where we know or have reason to believe that you or another person may suffer harm)
- **to perform a public task** in the public interest or in the Colleges official functions, and the task or function has a clear basis in law (for example, the provision of higher education)
- **consent** (for example to send information to enquirers, applicants and alumni)

We may share your data with the following categories of recipients:

Government departments, affiliated organisations and Higher Education bodies including:

- Higher Education Statistics Agency (HESA) – you can read HESA's data collection notice [here](#).
- Student Loans Company
- Enhanced Learning Credits Administration Services (ELCAS)
- Office for Students
- Department for Education
- Home Office
- Foreign and Commonwealth Office
- UK Visas and Immigration

- Health and Safety Executive
- Local authorities including the Council

Organisations contracted by the College to perform specific functions including:

- External Examiners
- Turnitin®
- Direct mail and marketing agencies
- External agents engaged by the College in relation to the repayment of student debts, where internal recovery attempts have proved unsuccessful
- The College's insurers
- The College's internal and external auditors

Organisations with which the College has a relationship to fulfil specific obligations or objectives including:

- The University of London
- The Students' Union
- UCAS
- UK-based and international educational institutions
- The Office of the Independent Adjudicator
- UK Research and Innovation

Organisations with which students have a relationship including:

- Sponsors and scholarship schemes
- Potential employers
- Partner institutions for students undertaking a year of study abroad
- Employers for students undertaking a year in industry or placement
- Higher Education Degree Datacheck

How long the College will retain your personal data

The College must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the College has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from the College's continued retention of the personal data
- the purposes for which the College may process your personal data
- whether the College is required to retain any personal data by law or in accordance with its legitimate interests

Your data will be kept in accordance with the College's Records Retention Policy and Schedule.

International Data Transfers

Most personal data about you, including your personnel file, will be stored on servers within the UK or elsewhere within the European Economic Area (EEA).

On occasion it may be necessary for the College to transfer your personal data outside of the European Economic Area (EEA). This will only take place in circumstances where there are appropriate and adequate safeguards in place which incorporate appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements.

How the College keeps your personal data secure

The College has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the College limits access to your personal data to the persons and organisations, including those described above, who have a lawful and legitimate need to access it.

The College has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

Your responsibilities

You have a responsibility to provide the College with accurate information about you, and should use the mechanisms available to you to update this information.

You must ensure that any personal data collected and processed by you in the course of your study is done so in accordance with data protection legislation, College policies and with your supervisor's permission.

You and your data

You have a number of rights in relation to the processing of your personal data by the College:

- **Access:** You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the College is processing it lawfully and fairly.
- **Correction:** You have the [right to request correction](#) of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the [right to request erasure](#) of any personal data held about you where there is no good reason for the College to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the [right to request restriction](#) of how the College processes your personal data; for example, to confirm its accuracy or the College's reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to the College's processing of any personal data which is based on the legitimate interests of the College or those of a third party based on your particular circumstances. You also have the right to object to the College processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or [request that the College transfers](#) a copy of your personal data in an electronic format where the basis of the College processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.

- Complaints: You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) or any other [EU supervisory authority](#) in relation to how the College processes your personal data.

The College may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the College to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, the College may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the College may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the College may ask you to verify your identity before fulfilling any request in relation to your personal data.

Changes to this notice

The College may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at dataprotection@royalholloway.ac.uk.

You also have the right to complain to the Information Commissioner's Office and you can find more information on their website – www.ico.org.uk