

Canterbury Christ Church University

Student Privacy Notice

1. Introduction

- 1.1 This Privacy Notice explains the types of personal data we may collect and how we use it. It explains how we store and handle that data and keep it safe.
- 1.2 This Notice applies to you if you have ever applied, enrolled or registered to study with the University. It includes undergraduate, postgraduate and research students, and apprentices, together with students on short courses.
- 1.3 We may collect additional information for some students and process it in different ways. These include students on professional programmes in the Faculties of Health & Wellbeing and Education, and apprentices.
- 1.4 We know there is a lot of information. However, we want to inform you fully about your rights, and how the University uses your data. A one-page summary document is available here: <https://www.canterbury.ac.uk/privacy/students>
- 1.5 We hope the following sections will answer any questions you have. If not, please do get in touch with us.
- 1.6 We will need to update this Privacy Notice from time to time. We will notify you of any significant changes. You are welcome to come back and check it whenever you wish. You can obtain the current version of this Notice at: <https://www.canterbury.ac.uk/privacy/Students>. We welcome comments on the Privacy Notice. We take any comments into account in updating the Notice.

2. Canterbury Christ Church University as Data Controller

- 2.1 Canterbury Christ Church University is the data controller for the processing activities described below. This means the University decides the reasons for, and how, we process your personal information.
- 2.2 Our contact details are as follows:

Canterbury Christ Church University
Rochester House
St George's Place
Canterbury
CT1 1UT

Website: <https://www.canterbury.ac.uk/>

Contact details: <https://www.canterbury.ac.uk/about-us/contact-us.aspx>

- 2.3 Where this Privacy Notice refers to “we”, “our” or “us” or “the University”, we mean Canterbury Christ Church University. Where we refer to “you” or “your” we mean an applicant to or a student at Canterbury Christ Church University.
- 2.4 We need to collect and process personal data to provide services to students and meet our legal requirements. It is essential for us to do so to manage our operations effectively, especially supporting students in their studies. We hold data in electronic and paper formats that include your personal details, academic and administrative history, and relevant transactions.
- 2.5 There is a statement on our approach to managing personal information in our [Data Protection Policy](#)
- 2.6 The University Data Protection Officer is

Robert Melville
Assistant University Secretary
Canterbury Christ Church University
Rochester House
St George’s Place
Canterbury
CT1 1UT

E-mail: dp.officer@canterbury.ac.uk
Telephone: 01227 767700

3. The legal bases we rely on

- 3.1 Data protection law sets out several reasons for collecting and processing your personal data. In this section, we outline the legal bases we rely on. You can read more about the legal bases in Appendix 1 (Purposes in Using Personal Data).

Contractual obligations

- 3.2 We need your personal data to comply with our contractual obligations.
- 3.3 For example, on becoming a student, you enter into a contract with us, so we can provide you with an education. If you live in our residential accommodation, you enter into a contract with us, so we can provide you with the accommodation to live in.

Legal compliance

- 3.4 If the law requires us to, we may need to collect and process your data.
- 3.5 For example, we need to ensure we meet our statutory obligations, including those related to diversity and equal opportunities, and health and safety. We might have to pass on details of people involved in fraud or other criminal activity to law enforcement and some regulatory bodies for students undertaking a professional programmes.

Public task

- 3.6 We need your personal data to enable us to perform a task in the public interest or for our official functions.
- 3.7 For example, we need to process personal data to award qualifications and ensure that we maintain academic standards.

Legitimate interest

- 3.8 In specific situations, we require your data to pursue our legitimate interests in a way which it is reasonable to expect as part of running the University. We do this in a way that does not materially impact on your rights, freedom or interests.
- 3.9 For example, we have a legitimate interest in maintaining contact with former students through our alumni relations.

Consent

- 3.10 In specific situations, we might collect and process your data with your consent. We will tell you if we need your consent. We will ask you to give consent before processing your data.
- 3.11 When we collect your personal data, we explain to you what data is necessary in connection with a specific service. We do this when we seek your consent. You can withdraw your consent at any time. You need not give a reason. However, this may restrict the service on offer, and we may explain this to you.
- 3.12 For example, if we need to undertake a University survey, we will tell you about the survey and how we will use your data. We are required by law to provide data for some surveys. These surveys include the National Student Survey (NSS) and the Destinations of Leavers from Higher Education (DHLE)

Vital Interests

- 3.13 We may need to process your data to protect your vital interests or those of another person. This will take place only where we cannot process your data on another legal basis. We will invite you to provide next of kin detail if you wish. You should ask your next of kin before providing their details.
- 3.14 For example, if a student needs admitting to the A & E department of a hospital with life-threatening injuries following a serious road accident, we may need to disclose information to protect the student's vital interests.

4. When do we collect your personal data?

- 4.1 We obtain personal data about you from various sources.

Information you give to us

- 4.2 As soon as you contact us, we create a record in your name. You may have provided your contact details for open day activities, when you enquired about being a student with us or sent us details about

yourself and your study plans. To that record, we add information you give us when applying and/or registering for one of our programmes. We add further information throughout your studies.

- 4.3 We hold general information about you, such as your name, addresses, email addresses, telephone numbers, programmes and modules studied and fee payments. We hold data relating to examinations, assessments, results for modules and programmes, and qualifications. We hold data relating to your engagement with various student procedures.
- 4.4 You may give us information about “special categories” of data, including your racial or ethnic origin, religious beliefs, physical or mental health, or sexual orientation. We use your “special categories” of data for activities including: equal opportunities monitoring and informing research. We use it for identifying if you need support and providing you with relevant opportunities. We use it so we can take account of the views of students with specific protected characteristics.
- 4.5 You might be required to give us information about any criminal convictions. This is required if you are on a programme that requires placements where there are vulnerable groups or leads to professional registration. This is because the safeguarding of vulnerable groups is a legal requirement.
- 4.6 You will give us further personal information when you start to use some of our services, for example, the library, IT, support and disability services, port, the bookshop, the Chaplaincy and career development. We may give you more information about what we do with your personal data when you start to use the service.
- 4.7 We might collect credit card information for payments of fees and accommodation charges. We also collect bank account information to pay bursaries and student travel expenses.

Information we automatically collect

- 4.8 We automatically collect information about your participation in learning and assessment activities, and your use of the virtual learning environment (Blackboard) and the library. We automatically collect information about assessment activities such as course work and examinations.
- 4.9 We will also add to your record any activities that you carry out on our website. We may automatically collect technical information when you browse our websites. We give further information in our Privacy and Cookies Policy.
- 4.10 If you use a University email address and other Microsoft Office 365 services, then we collect data about your use of the service.

Information we receive from third parties

- 4.11 We may receive information about you from third parties.
- 4.12 UCAS (Universities and Colleges Admissions Service) collects your personal information to manage and support your application to higher education. This is then share with your prospective universities.

- 4.13 We may contact the Higher Education Statistics Agency (HESA) or other educational institutions to confirm the qualifications you obtained. We may check your inclusion in a previous HESA or Individual Learner Record (ILR) return.
- 4.14 If you have your fees paid by a loan through the Student Loan Company (SLC), another funding authority or government agency, such as by a loan or grant, we will receive information from the funding provider. If another organisation pays your fees, this organisation may provide some information about you to us. Further information should be available to you in the relevant privacy notices of these organisations.
- 4.15 If part of your studies requires you to undertake a placement, we will process information we receive from the placement provider.
- 4.16 If you are studying and registered with a collaborative partner institution, we may receive information about you from our partner.
- 4.17 If you are not currently studying, we may enhance our records with data received from third parties to ensure we have up-to-date contact details for you and offer you relevant communications.
- 4.18 When we obtain personal data about you from third party sources, we ensure the third party has lawful authority to provide us with the data.

5. How we use your personal information

- 5.1 We collect and process a broad range of personal data about you to deliver our services and support you, to manage our operations effectively, and to meet our legal requirements.
- 5.2 Agresso QL Students, known as 'QL', is the student records system used at the University. QL contains all student data, including present and former students. QL is where we create and maintain student records. Both academic and professional service staff use QL to manage and view student data.
- 5.3 If you do not provide some of the information we need at application, registration or during your studies, we may not be able to provide fully effective academic or support services to enable you to succeed in your study.
- 5.4 The purposes for which we may use personal data (including special category personal data) we collect include:
- recruitment and admissions
 - arranging for the issue of a CAS for students applying for a Tier 4 visa, and communicating with the UKVI over immigration status
 - academic matters, including:
 - the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification, graduation)

- maintaining student records
- providing library, IT and information services;
- providing professional support services, including:
 - providing student support services (e.g. through personal tutors and Schools, Disability and Additional Learning Support, Career Development, the Student Support, Health and Wellbeing Service)
 - improving our offer of education
 - monitoring equal opportunities
 - safeguarding and promoting the welfare of students
 - ensuring students' safety and security, including recording and reporting accidents, incidents and near misses
 - managing student accommodation
 - managing the use of social media
 - managing car parking on campus
 - administering the financial aspects of a student registration (e.g. fees, rents, debt collection, scholarships and bursaries), including assessing eligibility for bursaries and scholarships
- dealing with enquiries and complaints
- organising and maintaining placements as part of your studies
- dealing with disciplinary actions
- carrying out research and statistical analysis to improve our efficiency and effectiveness as a higher education provider
- carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations)
- providing operational information (e.g. providing IT support, information about building and campus closures, access restrictions on campus, securing and promoting health and safety)
- promoting our services (e.g. student exchanges or other events happening on and off campus)
- preventing and detecting crime
- managing health and safety
- organising graduation ceremonies.

5.5 We may contact you about your studies, or for administration and support purposes. This could be by email, letter, Skype or telephone.

- 5.6 Information about any declared disabilities and special requirements you have will also be used to inform the provision of reasonable adjustments and other provisions for your study.
- 5.7 You may submit “special category” information to us. For example you may medical evidence for funding and extenuating circumstances. You may submit information about your religion relating to special circumstances for an examination. You may submit medical evidence to enable us to produce a learning support plan or a negotiated learning plan. You may provide medical evidence as part of an appeal or complaint. We only use this information for the purpose for which you provided it.
- 5.8 We keep records of you participating in learning activities, including monitoring your attendance, as part of your studies. We conduct attendance monitoring for several reasons including to ensure the proper engagement of our students and to assist with student visas for international students. We will require you to participate in electronic recording of attendance.
- 5.9 We may record some educational activities in which you take part. We make the recording for the legitimate purpose of providing online access to lecture content to deliver a learning experience for our students. You can opt out and request an edit of recordings. Except in agreed exceptional circumstances, we do not permit students to record educational activities other than for personal study purposes.
- 5.10 We provide further information on the purposes we use your information in Appendix 1 (Purposes in Using Personal Data). This includes the legal basis for processing data.

6. Who we might share your data with

- 6.1 We share data with several organisations for specific purposes. We set out further details in Appendix 2. In this section we give some examples of the way we might share your data.
- 6.2 When you register as a student, we will share some information with the Students’ Union (CCSU) as you automatically become a member. We have a Data Sharing Agreement with the Students’ Union.
- 6.3 We share data with other organisations where we have a legal or regulatory obligation to do this, for example with the Higher Education Statistics Agency (HESA), and with government departments. You can read about how HESA uses your data on its website (<https://www.hesa.ac.uk/about/regulation/data-protection/notices>).
- 6.4 We share your data so that you can be invited to participate in surveys commissioned by the Office for Students (OfS). Contractors may carry out these surveys on OfS’s behalf. If you do not want to take part in the National Student Survey (NSS), you can request this via www.thestudentsurvey.com
- 6.5 We share data with organisations that provide funding, for example the Student Loans Company and the national funding authorities/ government bodies e.g. Student Finance England, and sponsor organisations.
- 6.6 We may disclose your information to our third-party service providers and agents for the purposes of providing services to us, or directly to you on our behalf. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service. We

have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

- 6.7 If you are studying towards a qualification that leads to professional recognition we may share some information with the relevant professional or statutory body (for example, Nursing and Midwifery Council, Health and Care Professions Council, General Medical Council, British Psychological Society, Solicitors Regulation Authority, and Bar Standards Council).
- 6.8 If you are studying and registered with a collaborative partner institution, we may share information about your studies with our partner.
- 6.9 We may disclose your personal information if we are under a duty to disclose or share it to comply with any legal obligation. These purposes include detection or prevention of a crime, taxation, enforcing or applying the terms of our contracts, or protecting the rights, property or safety of our enquirers, visitors and students. However, we will always aim to protect your privacy rights.
- 6.10 We will pass personal data to third parties involved in graduation ceremonies (including robing suppliers and photographers).
- 6.11 We may disclose information for debt collection purposes. We would do this by sharing information with a debt collection or tracing agency.

7. How long we keep your personal information

- 7.1 How long we keep your personal information depends on several factors including our purpose for using the information and our legal obligations.
- 7.2 We have a retention schedule for information and keep identifiable records only for as long as they have a legal or business purpose. We provide more information in Appendix 3 (Retention Schedule). These are examples of the time we keep your data:
 - 7.2.1 We keep academic transcript data in perpetuity. This is to provide references and verify your study with us. This is to inform our ongoing relationship with you as an alumnus of the University.
 - 7.2.2 We keep some information relating to your modules and/or qualifications, and related queries and communications, until six years after you have completed the module or qualification. This is because there may be a need to establish, bring or defend any potential claims.
 - 7.2.3 We destroy some information within three years, where it does not have a longer-term impact, and required for business purposes. For example, we will destroy some data relevant to examinations and assessment shortly after the result is decided, and we will only keep the result itself.

8. How we protect and store your personal data

- 8.1 We know how much data security matters to our students. We will treat your data with the utmost care and take all appropriate steps to protect it.

- 8.2 We have a commitment to the data protection principles of good practice for handling information. All personal information is held securely, and we will only transfer data within the University on a 'need-to-know' basis so that we can support our academic and other services to you.
- 8.3 We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to improve security.
- 8.4 Generally, the information you provide to us is stored on our secure servers, or on our cloud-based systems which are located within the European Economic Area (EEA).
- 8.5 However, there are times when we need to store information outside the EEA. If we transfer your information outside the EEA, we will ensure appropriate security measures are taken to protect your privacy rights. This would either be imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. For example, we would ensure that a supplier based in the USA has signed up to "Privacy Shield" where available to the organisation.

9. Your rights as a data subject

- 9.1 You have the right to ask for a copy of the information about you that we hold. There is no charge. If you would like to make a request for information you can email us at this address: dp.officer@canterbury.ac.uk.
- 9.2 You have the following rights:
- To ask for inaccurate personal data to be rectified or completed if incomplete.
 - To have personal data erased in certain circumstances.
 - To request the restriction or suppression of your personal data in certain circumstances.
 - To request the portability of your personal data in certain circumstances.
 - To object to the processing of your personal data in certain circumstances.
- 9.3 You can make a request orally or in writing. We will respond in a calendar month.

10. Who to contact if you have a query

- 10.1 If there is anything you are unclear about, you can contact our Information Governance Manager (email: information.governance@canterbury.ac.uk), who is happy to answer any queries you may have concerning this Notice or the way in which we process your personal data.

11. Where to make a Complaint

- 11.1 If you have a complaint about the way we handle your data, you can complain to the University's Data Protection Officer.

11.2 The University Data Protection Officer is

Robert Melville
Assistant University Secretary
Canterbury Christ Church University
Rochester House
St George's Place
Canterbury
CT1 1UT

E-mail: dp.officer@canterbury.ac.uk
Telephone: 01227 767700

12. Contacting the Regulator

- 12.1 If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to make a complaint to the Information Commissioner's Office. The contact details are:

The Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113

Website: www.ico.gov.uk.

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Appendix 1

Purposes in Using Personal Data

	Specific Purposes	Legal Basis
	Application stage	
1	Management of enquiries from prospective students and communication of information about our services, events, and activities	Legitimate purpose of providing appropriate support to applicants based on their needs to enable applicant decision making, making use of a soft opt in (that is, not a specific opt in consent)
2	Correspondence with applicants regarding the next steps in the application and enrolment processes	Necessary for entering with students into a contract to educate
3	Processing of applications for study and enrolment as a student that include the processing of criminal convictions data and DBS checks	Necessary for the performance of a task in the public interest - the safeguarding of vulnerable groups
	Enrolment stage	
4	Administration of induction events, registration of students on courses and transfers to new courses	Necessary for entering into a contract to educate with students; necessary for the performance of a task in the public interest: the provision of higher education
5	The provision of University accommodation. This processing may include processing personal data you disclose regarding health condition or disabilities relevant to your accommodation.	Necessary for the performance of the University's contract with its students; explicit consent to the extent that special category personal data is obtained

Student Support Services		
6	Offering and providing additional support services such as careers advice, counselling services, financial advice, and access to sporting activities.	Access to these services are optional. Consent is relied upon for any processing necessary to deliver the services. The University will obtain explicit consent where sensitive personal data must be obtained to deliver the service.
7	Assessment of the provision of support services to students, including the provision of disability support services and study support services.	Legitimate purpose of providing appropriate support to students based on their needs
8	Processing of safeguarding concerns to ensure the safety and wellbeing of students	Legitimate purpose of ensuring the safety and wellbeing of students
9	Providing facilities and services central to studies particularly Library access and computing access	Necessary for entering into a contract to educate with students; necessary for the performance of a task in the public interest: the provision of higher education
10	Monitoring of use of IT services in accordance with Acceptable Use Policy	Legitimate purpose of ensuring network security
11	Monitoring student attendance, and engagement with course material available on the VLE	Legitimate purpose of ensuring students achieve academic success through full engagement with their studies
12	Monitoring compliance with equalities legislation	Legitimate purpose of seeking to widen access to higher education, encourage diversity amongst the student body, and provide appropriate support; necessary to comply with a legal obligation - requirement to comply with the University's obligations under the Equality Act 2010 and reporting requirements to HESA
13	Provision of immigration welfare services for international students, including applications for visa extensions	Legitimate purpose of supporting international students; necessary to comply with a legal obligation - compliance with immigration legislation
14	Administration of external and internal student surveys, including collection of feedback on distinct services such as Library and Careers	Consent from students who complete the surveys
15	Administration of job applications and employment contracts where the student is employed through UNITEMPS	Necessary for the purposes of entering into an employment contract with students or

16	Research and statistical analysis into Learner Analytics	Necessary for the performance of a task in the public interest - the provision of higher education; Legitimate purpose of analysing student data to help make informed decisions which can lead to improved student satisfaction, retention, and attainment
17	Submission and marking of work submitted for assessment	Necessary for the performance of the University's contract with its students; explicit consent to the extent that special category personal data is obtained
18	Evaluation of academic assessments and course work	Necessary for the performance of a task in the public interest - the provision of higher education
19	Making of academic awards	Necessary for the performance of a task in the public interest: the provision of higher education.
20	Audio recording of lectures in accordance with our Lecture Capture Policy	Legitimate purpose of providing online access to lecture content to deliver a learning experience for our students
21	Processing and recovery of University fees, including course and accommodation fees	Necessary for the performance of the University's contracts with students
22	Administration of financial awards and prizes such as scholarships, bursaries, and grants, including grants and scholarships provided by third parties	Legitimate purpose of administering financial support for students
23	Administration of financial aid, such as grants and loans	Legitimate purpose of administering financial support for students
24	Registration as a member of University alumni upon graduation. Your data as an alumni member will be processed in accordance with the University's alumni data protection notice.	Legitimate purpose of maintaining our relationship with graduates

Student Procedures		
25	Administration of disciplinary proceedings concerning student misconduct	Legitimate purpose of protecting the University and wider community
26	Administration of investigations into academic misconduct in accordance with the University's procedure for handling academic misconduct	Necessary for performance of task in the public interest: higher education provision, (Investigating complaints concerning misconduct is necessary to maintain integrity of University's assessment process, our academic standards and reputation)
27	Administration of student appeals and complaints	Necessary for performance of a task in the public interest: higher education provision providing an avenue to raise appeals regarding academic assessments and any other grievances); necessary to comply with a legal obligation - requirement to comply under consumer law
28	Administration of extenuating circumstances applications	Consent
Administration of the University		
29	Production of student identification cards and the issue and administration of cards used for purchasing goods and services, including monitoring of usage	Legitimate purpose of registering students and providing cards offering benefits
30	Credit card information for payments of fees and accommodation charges. Bank account information to pay bursaries and student travel expenses.	Necessary for the performance of the University's contracts with students
31	Recording and reporting accidents, incidents and near misses	Legitimate purpose of providing a safe University environment. There is a legal obligation to record and report accidents, incidents and near misses in specific cases.

32	The University has a CCTV surveillance system across its campuses. In certain circumstances, members of Security may use body worn CCTV cameras. Trained members of staff monitor those cameras located on and within buildings and do so in compliance with the University's Data Protection Policy.	Legitimate purpose of providing a safe University environment, facilitate prevention and detection of crime and assist with investigation into potential breaches of University regulations and policies
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Canterbury Christ Church University

Student Privacy Notice

Appendix 2

How the University might share your personal information

The University may disclose appropriate personal data, including when relevant conditions apply sensitive personal data, during or after your studies to those outside the University (sometimes called third parties).

Such disclosure is subject to ensuring the identity and legitimacy of those making the request.

UCAS

UCAS (Universities and Colleges Admissions Service) collects your personal information to manage and support your application to higher education, which they then share with the University. This is necessary for the performance of a task in the public interest: the provision of higher education

The University shares personal information with UCAS on your status as an applicant. This is to administer the applications and clearing process. It is part of the process of forming a contract with a student.

The Students' Union

Unless you choose to opt out, we shall pass certain specific data to the Students' Union. The data transferred and the purposes for which it is used are set out in the [Data Transfer Agreement](#) between the University and the Students' Union.

This necessary to comply with a legal obligation, which is requirement to secure fair Students' Unions elections.

It is also part of the University's legitimate purpose in providing students with access to Students' Union and their services, and for sporting, cultural and recreational activities.

Turnitin®

The University makes use of the [Turnitin® UK system](#) to help assessors check students' work for improper citation and potential plagiarism. The system creates a textual similarity review by comparing students' work against a variety of sources. Students may therefore be required to provide a limited amount of personal information, for instance name, email address and course details and submissions, to Turnitin® when using the service.

The University may authorise third parties to and/or make directly copies of any work submitted by you for assessment but only for the following purposes:

- i) assessment of your work;

- ii) comparison with databases of earlier answers or works or other previously available works to confirm your work is original; and
- iii) addition to databases of works used to ensure that future works submitted at this institution and others do not contain content from your work.

The University will not make any more copies than are necessary for these purposes, will only use copies made for these purposes and will only retain such copies as remain necessary for those purposes. Where the University make and keep copies for the purposes identified above, we do not make personal data available to any third party as we anonymise the material.

The University will not make any more copies than necessary, will only use copies made for these purposes and will retain such copies as remain necessary.

This information will be stored on a server based in the United States under the TRUSTe Privacy Seal. This requires the management of the information to similar standards to those required under the General Data Protection Regulation. Turnitin® explains this in its [Privacy Pledge](#).

This is necessary for performance of a task in the public interest: provision of higher education services and the need to maintain academic quality standards and integrity.

Blackboard

The University makes use of Blackboard, a Virtual Learning Environment (VLE) that provides a wide range of online tools, as well as a place to upload course materials and other resources. Students automatically have access to the Blackboard system but need enrolling on Blackboard courses they are studying. Once enrolled, we will share data with Blackboard.

Blackboard is Privacy Shield certified, and a signatory of the Student Privacy Pledge.

This is necessary for the performance of the contract to educate.

South East University Library Shared Services Partnership (Libshare)

The partners of Libshare are Canterbury Christ Church University, University of Kent, and the University of Greenwich. We work together to provide advanced modern, joined-up, reliable and cost-effective Library-related and IT service. What we are doing is streamlining our library operations to deliver high quality library services.

The partnership facilitates shared working in our library operations and information management. This supports improvement in all aspects of the library services across the universities, including searching for and ordering titles for the daily benefit of those using library services.

To provide the service, we must process a limited amount of personal data, including information on any disability.

It is part of the University's contract to educate in providing access to learning resources.

Sponsors, loan organisations and scholarship schemes

If you have a sponsorship, scholarship, bursary or a loan, the University may disclose student personal information to the relevant provider to determine whether support should continue.

If your funding organisation requires regular progress reports as a condition of receiving funding, we will normally provide this information. If you have any queries about such reports, you should contact your funding organisation in the first instance.

This is in the legitimate interests of the University in enabling students to continue with their studies

Debt recovery

We may disclose personal information about students to third parties attempting to recover debt on behalf of the University where internal procedures proved unsuccessful. This includes sharing information with Debt Collection and Tracing agencies.

Payments are due to the University as part of our contractual relations, and the disclosure is part of the enforcement of the contract.

Higher Education Statistics Agency (HESA)

The University has by law to pass personal information to the Higher Education Statistics Agency HESA. Further details about the information shared with HESA are set out in the [HESA-Student collection notice](#) on the [HESA website](#).

This is necessary to comply with a legal obligation: the requirement to provide information. It is also necessary for the performance of a task in the public interest (statutory functions or responsibilities of Government Departments and public bodies) and for statistical and research purposes in the case of disclosures of sensitive personal data).

Local Authorities

The University may disclose your personal information to Council Tax offices. The Data Protection Act 2018 allows organisations to disclose information to relevant bodies for the assessment and collection of taxes.

As students who live in properties occupied solely by other students are not liable to pay Council Tax, such disclosures will usually be in your interest.

We have agreements with some councils that make payment for students' accommodation, including care leavers. We have to provide to the council an invoice which shows the student name/ID and full accommodation details.

Other Statutory Disclosures

The University has certain other statutory obligations under which it may be required to pass personal information relating to you to certain external agencies to meet legal obligations.

Wherever possible, the University will inform you about these disclosures but in some cases, it is not possible to do this. These are examples of the types of agencies to which the University has a statutory obligation to disclose personal information relating to students

- ⇒ Quality Assurance Agency (QAA) during quality assessment exercises
- ⇒ Office for Students (OfS)
- ⇒ European Audit Commission (for specified programmes)
- ⇒ Student Loans Company (SLC) and Student Finance England for students eligible for fee, loan, or grant payments
- ⇒ Electoral Registration Officers
- ⇒ Professional and regulatory bodies

Placements

For students registered on programmes involving placements, the University will pass necessary personal details and information relating to assessment to the placement providers. In addition, we will receive information from the placement provider about your work on the placement.

The purpose of disclosing this information is to administer the placement and for educational and assessment purposes. This is part of our contract to educate.

Partner Institutions

Some students undertake studies at another UK based or international partner institution. We collaborate with these partner institutions to deliver joint franchised, dual, or validated awards. For students studying at these institutions, the University shares information with the partner. This is part of our contract to educate.

Further information is available in the privacy notice of the partner institution.

National Student Survey

The University has by law to pass information about its final year undergraduates to the Office for Students (OfS), or its agents, for them to carry out the National Student Survey (NSS). This survey gives final year students the chance to give feedback on their experiences at the University and so informing the choices of prospective students. There is a detailed description on the [National Student Survey website](#).

The University will pass your name and contact details to the agent carrying out the survey. The agent may contact you to take part. You do not have to take part in the survey. You can opt out at any time before taking the survey by contacting the agent and providing verification of your identity by confirming your date of birth.

Study Activities outside the UK and students from outside the UK

Some students are on programmes that include study outside the UK, or who come to the University as visiting and exchange students. There is a need for the University to exchange personal information with institutions in other countries involved in these exchanges. For instance, students on visiting and exchange programmes may require the University to supply information. The University will receive information about the progress of students while at the other institutions. There may be requirements for the provision of information to some of the bodies that fund visiting and exchange students. This forms part of our contract to educate.

You should be aware that some countries outside the European Union do not necessarily have as strong a data protection regime.

Prevention or detection of a crime

The University might provide information, in accordance with the Data Protection Act 2018 if the disclosure is for the prevention or detection of a crime, the apprehension or prosecution of offenders, or for taxation purposes.

The University might provide information to the police or another organisation with a crime prevention or law enforcement function. This might include, among others, the anti-fraud sections within the Student Loans Company, local authorities, the NHS Bursary Unit, NHS counter fraud offices, and United Kingdom Visa and Immigration (UKVI).

Immigration Status

The University shares information on overseas students with Home Office, UKVI and other international and national governmental and regulatory bodies. This in connection with the assessment of students' immigration status.

This is necessary for compliance with legal obligations: immigration status. It is also necessary for the performance of a task in the public interest: compliance with immigration requirements.

Auditors

Like all other organisations, the University appoints external and internal auditors who have access to students' personal data during their investigations.

Auditors treat personal information in confidence and do not make it public.

Audit is a legal requirement.

University Insurers

If you have a claim against the University, we may have to provide information to our insurers. This is a legitimate interest in managing insurance claims.

Health and Safety Executive

If you are involved in an accident, incident or near miss on, or involving, University property, it may be necessary to pass your details to the Health and Safety Executive (HSE). This is a legal requirement.

External examiners

We share student assessments, including profiles of marks with external examiners for examination.

This is necessary for the performance of a task in the public interest: the provision of higher education and the maintenance of academic standards.

Parents, guardians, other relatives, friends, and emergencies

The University treats information concerning you as a student as confidential. The University does not release information to a third party, including friends and relatives, about your addresses and telephone numbers, your studies, your progress, and the provision of services. The exceptions are where you have authorised the release of the information, the third party is acting as a guarantor or the University must release the information by law.

Except in the most exceptional of circumstances, which affects the vital interests of a student who is unable to give consent, the University will not disclose personal information.

If you provided a nominated contact in the event of a medical or other emergency, then the University may provide some personal information to that contact.

How will the University use your personal data after you have finished your studies?

References

The University may disclose relevant additional information about you if asked by a third party to provide a personal or academic reference for employment or further study.

As a matter of good practice, you should inform people you give as a referee beforehand.

If you named the University or any member of its staff in an application, the University considers it its legitimate interests to disclose personal information in the form of a reference. This is subject to your rights, freedom, or interests.

In some cases, we may receive requests for references on pro-forma you signed to permit us to disclose information as a personal reference.

Employment agencies, prospective employers and third parties requesting confirmation of awards

However, the University may confirm any award, including the date and classification of the award, without notifying the student in the public interest. This is because we need your personal data to enable us to perform a task in the public interest as an award making institution.

Such a disclosure would be subject to a check on the origin of the request. The University may request the consent of former students before disclosing details of any award.

Award Ceremonies

Names appear in the official award ceremony programme and promotional material connected with the ceremony.

You may request to have your information excluded by contacting Graduation & Registry Events in advance of the ceremony.

You should contact [Graduation & Registry Events](#) regarding this matter when you receive an official invitation to a ceremony.

Careers

The University has by law to pass information about previous graduates to the Higher Education Statistics Agency (HESA), or its agents, for them to carry out a destinations survey as part of the Graduate Outcomes record. This survey is conducted approximately 15 months after you complete your studies.

The University will pass your name and contact details to the agent carrying out the survey. The agent may contact you to take part. You do not have to take part in the survey. You can opt out at any time during the fieldwork period by contacting the agent and providing verification of your identity by confirming your date of birth.

The data collected from the survey will be analysed by HESA and published in an anonymised form so that your responses cannot be identified. A copy of the survey data will also be provided to the University and analysed to inform improvements to programmes and student support around life skills, careers and employability.

There is further information for students about the Graduate Outcomes survey on the HESA website.

Canterbury Christ Church University

Student Privacy Notice

Appendix 3

Retention Schedule

Section One: Materials Relating to Student Procedures and Assessments

Type of documentation	Retention Period	Reason for Retention Period	Where Definitive Copy Retained
Application			
Expressions of interest in courses and open day information	Six months after cessation of relationship	Responding to enquiries from applicants	Marketing
Application forms, interview information - unsuccessful applicants and successful applicants declining an offer	One year after the end of the admission cycle	Responding to enquiries or complaints from applicants	Academic Administration
Application forms, interview information - successful applicants registering at the University	Six years after student leaves	Limitation Act 1980 ss2,5	Academic Administration
Application data	Ten years after application made	Identifying trend data; necessary for the performance of a task in the public interest: the provision of higher education and widening access	Academic Administration
Information relating to DBS disclosure	Six months after checking, in line with DBS requirements; record of	Responding to enquiries or complaints from applicants;	Academic Administration

	undertaking the check for the duration of the student's registration	record required to evidence to undertaking of the check	
Student Academic Record			
Records relating to a student's registration on programme and modules, and administration of the programme	Six months after Student leaves programme	Student Appeal or Complaint	School
Records relating to a student's registration at the University, including progression data	In perpetuity	Confirmation of registration at the University	Academic Administration
Academic records, including classification of awards and module grades	In perpetuity	Confirmation of academic programme and award	Academic Administration
Administrative Records			
Information relating to student debt and student payments	Six years after discharge of debt	Limitation Act 1980 ss2,5	Finance
Credit card and bank details relating to fees, charges and payments	Six years after the final payment	Limitation Act 1980 ss2,5	Finance
Contents of student file e.g. attendance date, e-mails etc	Six years after student leaves	Limitation Act 1980 ss2,5	School
Accidents, incidents and near misses	Three years after the occurrence of date of knowledge of the person injured.	Limitation Act 1980 s11	Human Resources

	Specific occurrences retained for longer if required by law.	Health and Safety at Work Act 1974 and relevant health and safety regulations	
Materials Related to Examined Work			
Coursework submissions (Coursework is taken to include all forms of assessment other than examination scripts)	A copy of course work submitted by students is retained for six months after Board of Examiners approving the mark or grade.	Examination Process and Student Appeals	School
	Where no second copy is submitted, the course work is returned to students after marking, and collected from student before Board of Examiners. The work is returned to students after the meeting of the Board of Examiners at a date to be specified by students in advance, which is to be at least one month after the meeting of the Board, after which period there is disposal of the work. Where a date is not specified in advance, disposal of work takes place six months after Board.	Examination Process and Student Appeals	School

	There is no requirement for the retention of work deemed as impracticable to retain (including presentations, recitals, exhibitions, and artefacts) or where the work is required for professional practise. Suitable arrangements are to be put in place for the engagement of external examiners.	Examination Process and Student Appeals	School
	Samples of student work may be retained for three years	Staff development and inspection/audit purposes	School
Assessment feedback	Six months after Board of Examiners making the award	Examination Process and Student Appeals	School
	Sample may be retained for three years, replaced on rolling basis, and be anonymised where practicable	Staff development and inspection/audit purposes	School
	Individual markers may retain comments for three years	Benchmarking performance	Individual Markers
Dissertations	MPhil/PhD - indefinitely		Library
	Masters dissertations - a period of ten years from Board of Examiners with the written consent of the student concerned	Reference purposes	School

	Undergraduate individual studied are treated as coursework, except that samples may be retained for a period of three years from Board of Examiners with the written consent of the student concerned. Wherever possible undergraduate individual studies should be anonymised.	Reference purposes	School
Examination scripts and comments	Six months after Board of Examiners making the award	Examination scripts are those assessments that are not returned to students, and where exemption under the Data Protection Act 2018 has been asserted.	School
Examination question papers	Three years after the end of the year of examination	Reference purposes	Library
Coursework assessment descriptors and criteria	Six months after Board of Examiners making the award	Examination Process and Student Appeals	School
Placement and Attendance Records			
Placement records	Six Years after Board of Examiners making the award	Limitation Act 1980 ss2,5	Faculty Placement Office
Attendance records	Three years after Board of Examiners making the award	OFS audit requirement	School

Extenuating Circumstances Materials			
Extenuating Circumstances requests and outcomes where the final award is based on more than one level of study	Six months after the meeting of the Boards of Examiners approving the award (except where the student enters an appeal, in which case the materials are to be retained for six years)	In a three-year full-time degree programme, the award is based on the second and third year of the programme. The concessions evidence for the second year is to be retained for six months after the meeting of the Board meeting at the end of the third year. In terms of appeals, the Limitation Act 1980 ss 2, 5 applies.	School
Extenuating Circumstances requests and outcomes where the outcome is based on one level of study	Six months after the meeting of the Boards of Examiners making the decision (except where the student enters an appeal, in which case the materials are to be retained for six years)	In a three-year full time degree programme, the award is based on the second and third year of the programme. The concessions evidence for the first year is to be retained for six months after the meeting of the Board meeting at the end of the first year.	School
Supporting Evidence for Extenuating Circumstances requests	Three months after the student is informed of a decision not to agree a request. After the communication of the decision where the request is agreed.	Examination Process and Student Appeals	School

Negotiated Learning Plans/Learning Support Plans	Six months after the meeting of the Boards of Examiners making the decision (except where the student enters an appeal or complaint, in which case the materials are retained for six years)	In a three-year full time, degree programme, the award is based on the second and third year of the programme. The concessions evidence for the first year is to be retained for six months after the meeting of the Board meeting at the end of the first year.	School
Board of Examiners Proceedings			
External examiner nominations	Six years after end of term of office	Limitation Act 1980 ss2,5	Quality and Standards Office
Papers relating to submission or resubmission of work	Six months after Notification to Students of Board's Decision	Examination Process and Student Appeals	School
Mark Sheets	One year after Notification to Students of Board's Decision	Examination Process and Student Appeals, and to track students in preparation of the next Board for continuing students	School
Minutes of Board of Examiners	Six Years after Board of Examiners making the award	Limitation Act 1980 ss2,5	School
Correspondence informing students about outcomes of Board of Examiners decisions	One year after Board of Examiners making the award	Examination Process and Student Appeals, and to track students in preparation of the next Board for continuing students	School
Records documenting marks/grades given to submitted/completed summative assessments and, where appropriate, awards and classifications	Six Years after Board of Examiners making the award	Limitation Act 1980 ss2,5	Academic Administration

Decision Sheets	Six Years after Board of Examiners making the award	Limitation Act 1980 ss2,5	Academic Administration
External examiner reports	Six Years after date of report	Limitation Act 1980 ss2,5	Quality and Standards Office
Disciplinary Procedures			
Procedures Documentation	Six Years after last changes	Limitation Act 1980 ss2,5	Governance and Legal Services
Outcomes of formal plagiarism investigations, including panels	See Procedures for Dealing with Allegations of Plagiarism	Retention dependent on the stage of proceedings	School (Academic Support Office for panels)
Academic Misconduct Investigations	Six years after the student has left the programme	Limitation Act 1980 ss2,5	Academic Support Office
Formal Disciplinary Proceedings	Six years after the student has left the programme	Limitation Act 1980 ss2,5	Academic Support Office
Student Fitness to Practise/Professional Suitability Panel Papers, including case log	Six years after the student has left the programme	Limitation Act 1980 ss2,5	Faculty
Any disciplinary proceedings not leading to formal proceedings	Six months after the closure of the investigation	Student Appeal	School or department undertaking investigation
Cause for concern letters/ correspondence/records of meetings	Six months after the closure of the investigation	Student Appeal	School or department undertaking investigation
Appeals and Complaints			
Academic Appeals papers	Six years after the last formal event associated with the appeal or complaint	Limitation Act 1980 ss2,5	Academic Support Office

Office of the Independent Adjudicator papers	Six years after the last formal event associated with the appeal or complaint	Limitation Act 1980 ss2,5	Governance and Legal Services
Formal Complaints	Six years after the student has left the programme	Limitation Act 1980 ss2,5	Academic Support Office
Research Students			
Records documenting the conduct of formal assessments of work undertaken by research students.	Six years after the student has left the programme	Limitation Act 1980 ss2,5	Graduate Office
Records documenting academic advice and guidance to individual students on the selection of research subjects and on the progress and standard of their work.	Six years after the student has left the programme	Limitation Act 1980 ss2,5	Graduate Office
Records documenting the appointment of supervisors and examiners for research students.	Six years after the student has left the programme	Limitation Act 1980 ss2,5	Graduate Office

Section Two: Materials Relating to Validation, Review and Policy

Policy Materials			
Policy Documentation	Six Years after last changed or withdrawal	Limitation Act 1980 ss2,5	Quality and Standards Office
Professional, Statutory and Regulatory Body Approval and Monitoring Information	Six Years after date of documentation or end date of approval	Limitation Act 1980 ss2,5	School
Planning Forms	Six years after last cohort	Limitation Act 1980 ss2,5	Planning Office - Schools hold copies as working documents for duration of the Programme
Final validation document	In perpetuity	Archive Purposes and Confirmation of academic programme and award	Quality and Standards Office - Schools hold copies as working documents during finalisation of validation document
Validation minutes	Six Years after Validation Panel by the Quality and Standards Office	Limitation Act 1980 ss2,5	Quality and Standards Office
Validation evaluation forms	Six months after Validation Panel	Evaluation purposes	Quality and Standards Office
Validation and External expenses claims	In line with Finance Requirements		Quality and Standards Office

Programme modifications	In perpetuity	Archive Purposes and Confirmation of academic programme and award	Quality and Standards Office - Schools hold copies as working documents during finalisation of validation document
Short courses	Six years after last cohort	Limitation Act 1980 ss2,5	Quality and Standards Office - Schools hold copies as working documents during finalisation of validation document

Materials Relating to Partnerships			
Memorandum of Agreement	Six years after last cohort	Limitation Act 1980 ss2,5	Quality and Standards Office
Memorandum of Understanding	Six years after last cohort	Limitation Act 1980 ss2,5	Quality and Standards Office
Financial Arrangements for Collaborative Partnerships	Six years after last cohort	Limitation Act 1980 ss2,5	Quality and Standards Office
Collaborative Provision Sub Committee Minutes and Papers	Six Years after the end of the Academic Year in which it took place	Limitation Act 1980 ss2,5	Quality and Standards Office
School and Departmental Reviews			
Periodic Internal Review Reports	Six years after Approval of Report	Limitation Act 1980 ss2,5	Quality and Standards Office

Annual Departmental Review Reports	Six years after Approval of Report	Limitation Act 1980 ss2,5	Quality and Standards Office
Handbooks			
Student Handbook Template	Maintained in real time	Provide latest version	Quality and Standards Office
Programme Handbooks	Six years after the year of programme	Limitation Act 1980 ss2,5	School
Placement Handbooks	Six years after the year of programme	Limitation Act 1980 ss2,5	School
Module Handbooks	Six years after the year of programme	Limitation Act 1980 ss2,5	School
Programme and Module Evaluations			
Evaluation Forms	Three months after completion of report	Evaluation purposes in the legitimate interests of the University	School
Evaluation Report	Six years after the year of programme	Limitation Act 1980 ss2,5	School
Student Surveys			
Pseudonymised data	Ten years after the completion of the survey	Data processed for scientific, statistical and historical purposes	Student Survey Unit