

Students and Applicants Privacy Notice

The Royal Agricultural University (RAU) is a data controller and is committed to protecting your personal data and working in accordance with all relevant data protection legislation. This privacy notice explains how the University processes and uses the personal data we collect about applicants, registered and former students.

The University will process your data in compliance with the General Data Protection Regulation (GDPR) which came into effect on 25 May 2018.

How we collect data

The University may hold data relating to you from a number of sources. The majority of data we hold on applicants is that which you provide on your application form. This may be through an application made via the Universities and Colleges Admissions Services (UCAS), a direct application to the University or through a recruitment agent. Your application data forms the basis of your student record to which we will add further information. Further information may come via direct communication with or from you (e.g. through telephone calls, email, letter, University website enquiry form), or via the University's Customer Relationship Management (CRM) system. Other information may come from third parties, for example the Student Loan Company, those whom you nominate or ask to provide a reference about you or organisations who are sponsoring you or providing you with a scholarship.

CCTV

For our use of CCTV on campus, please see the CCTV policy.

IP Addresses, Cookies and your Devices

We may collect information about the device/s you are using to access our online services, the operating system and browser type used and your IP address. This is intended to provide aggregated data about users' behaviours and does not identify any individual. It is used to inform improvements to the website, for system administration, and to report aggregate information to third-party sub-contractors we may be working within areas such as advertising, search information providers, analytics providers or in technical delivery services.

We may also obtain information about your general internet usage relating to our websites by using a pixel or a cookie file, which is stored on the hard drive of your computer. Again, this is used to provide aggregated data on how users access and

navigate our websites, and to assess their usefulness. Personal information about you is not collected during the tracking process.

Other relevant information will come from your interactions with the University during your time as a student, and these are outlined below.

What data do we hold?

Personal Data

- Personal Identifiers and Biographical Information – for example your name (including title if provided), date of birth, nationality and country of domicile
- Contact Details – for example your address, email address and telephone number (we update these whenever you tell us they have changed)
- Photographs
- Passports, national identity cards or other photographic ID documents
- National Insurance Numbers
- An individual student registration number which we allocate to you
- Sponsor details
- Next of Kin and/or nominated emergency contact details (where provided)
- Education Details – for example what you studied before applying, where you studied, your qualifications and details of what you study and your achievements as a student of the University
- Information arising out of the legitimate execution of University policies and procedures, for example, Academic Misconduct, Disciplinary issues, Mitigating Circumstances, Appeals and Complaints
- Information about your personal circumstances and any other information you may provide in relation to applications for a scholarship, or for wider student support.
- Placement details
- Payment details (e.g. fees) including debt to the University
- Information on hobbies and interests
- Career aspirations
- CCTV – see our CCTV policy
- Any other personal data required to carry out the legitimate business of the University

Special Category Data

Under the GDPR, sensitive personal data is called “special category data”. The types of special category data held by the RAU are:

- Racial or ethnic origin, religion or other beliefs and sexual orientation
- Biometric data (for students on a Tier 4 Student Visa)
- Certain criminal convictions
- Information concerning disability, learning support, health and dietary needs and notes from counselling sessions

Legal basis for processing

As a University, the RAU has a **public task** to deliver higher education, and also has a vital, public and **legitimate interest** in processing personal data before, during and after the end of the student relationship. These include the provision of its academic and support services, processing student academic results and the awarding of RAU qualifications.

The RAU needs to process data to process applications and to enter into a student **contract** with you and to meet its obligations to you as a student. The RAU also needs to process data for the provision of accommodation and to meet its financial management requirements.

The RAU needs to process data to ensure that it is complying with its **legal obligations**. For example, statutory reporting to the Office for Students, the Home Office for overseas students, and to comply with health and safety legislation.

Where the University contacts you by email, it will have your **consent** to do so.

Special Categories of Personal Data

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out legal obligations (such as those in relation to students with disabilities and for health and safety purposes).

Where the RAU processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. On the basis of legitimate interest, the RAU may collect information concerning any criminal offences or criminal proceedings.

Special Categories of Data may also be collected and processed to assist with Student Counselling Services.

Data that the RAU uses for these purposes is collected with the express consent of students.

How we use your data

We will use your personal data (including sensitive personal data) as appropriate during your association with the University for the following purposes in order to provide you with the appropriate support and administration expected by students for an award of the University:

- Recruitment and admissions (to determine your suitability to study and to become a member of the University community and to communicate with you throughout the application process using the University's CRM system)
- Research and Academic purposes – The University may process personal data, including special category data, for research purposes. This includes pedagogic research aimed at enhancing teaching and learning practices across the University. Such research is conducted in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR) and

the Data Protection Act 2018. Where possible, data used for research purposes will be anonymised or pseudo anonymised to protect individual identities. In cases where this is not feasible, the University will ensure that processing is necessary for the purposes of scientific or historic research or statistical purposes and adheres to safeguards to protect the rights and freedoms of individuals. The University relies on lawful bases such as legitimate interests or public tasks to process personal data for research purposes. Students will not be individually identified in research outputs without their explicit consent, except where required by law.

- Non-academic purposes (including the provision of student support, disability and additional learning support, careers and employability services, student accommodation, car parking, health and safety of the University, safeguarding and promoting student welfare, RAU Students' Union membership)
- Identification purposes (the production of photographic ID cards)
- Financial purposes (processing applications for student loans, bursaries and scholarships, collection of tuition (and other) fees, including accommodation)
- Other purposes (including producing statistical reports, monitoring equal opportunities, carrying out audits, compliance with regulatory and statutory bodies, e.g., Office for Students (OfS) and other government agencies)
- When you graduate we will copy your personal data from your student record to the University's alumni database. You may opt-out of this if you choose, see the Alumni privacy notice for more details.

How will we share your data?

Where there is a legitimate reason for legal (or statutory) requirement to do so or for the purpose of effectively providing support, information may be passed between services, limited to what is relevant, to set up support. Some information will be shared during the application process, this is to ensure support will be in place throughout this process and at the point you join the University. Information may be stored on systems that are used by other services; however, access will be limited.

We work with professionals outside the University such as NHS medical health teams and agencies involved in your support or funding. They have their own confidentiality policies. We only share relevant information with the sole purpose of supporting our students and we will ordinarily inform you in advance unless we have significant welfare concerns. In some circumstances, these external parties may contact you directly.

We do not respond to requests for information from parents, guardians or other third parties (unless covered by Data Protection exemption e.g. from the Police). Such requests will be refused unless you have given us explicit permission in advance.

Your data may be disclosed to the following third parties:

- Office for Students (OfS)
- Higher Education Statistics Agency (HESA)
- Universities and Colleges Admissions Services (UCAS)

- Disability Support Allowance (DSA)
- The Quality Assurance Agency for the United Kingdom (QAA)
- Local Education Authorities (for the purposes of student financial support)
- Local Councils (for the purposes of Council Tax Exemption Certificates)
- Student Loans Company (SLC)
- External Support Agencies
- External funding agencies and organisations (e.g. for student scholarships)
- UK Visas and Immigration
- The University's contracted Student Records Systems providers
- The University's contracted counselling services
- The University's contracted debt collection agencies
- The University's contracted provider of pre-sessional or preparatory courses
- Professional, Statutory or Regulatory Bodies (e.g. RICS, CMI) for the purposes of your professional accreditation (where appropriate)
- Organisations contracted by OfS or other government departments contracted to undertake data collection or surveys e.g. National Student Survey, Graduate Outcomes
- Other education providers, partners or research organisations where your programme of study is being run collaboratively
- External Examiners
- External and Internal Auditors
- Educational Recruitment Agents assisting the University
- Police and other crime detection and prevention agencies
- Your referees and/or previous education providers to investigate potential fraud
- Potential employers or education providers requesting a reference on your behalf (where you have provided the third party with details of the University as a referee)
- Placement providers
- The UK national agency for international qualifications and skills (UK ENIC).

At graduation your personal data (name, award, classification and any prizes) will be published in the graduation booklet. This information will also be passed to third parties involved in the ceremonies (e.g., the supplier of the University's academic gowns and the official photographer)

How do we protect your data?

Your data is held securely on the University's student record database (Quercus), the University's CRM database, the University's finance system (Dimensions), the University's accommodation system (KX), and the University's internal server network. All staff who access the database have completed the University's General Data Protection Regulation training.

The University does not give to third parties for their own use, except where required to do for statutory or legal reasons, and it will never sell your data.

How long do we keep your data?

We do not keep personal data for any longer than is required by our regulators or other authorities. For example, application data will be kept for one year after the intended start date (for those that do not join the University) in order for us to make statistical reports and for applicants to request reconsideration. For students who do join the University, personal data is normally retained for a maximum period of seven years after completion of studies, after which only data which will enable the University to produce confirmation of academic progress and qualifications is retained.

Your rights and preferences

You have the right to:

- Ask us to see, correct or delete the data we hold about you.
- Object to specific data uses, as described above.
- Object to receiving communications and direct marketing.
- Ask for the transfer of your data electronically to a third party.

If you ask us to delete your data, we will maintain a skeleton record comprising your name, data of birth, subject of study, year of graduation, final award and student number. As an awarding body, we are required to keep this information.

Further information:

This privacy notice will be kept under review. Any changes will be updated on our website and communicated to you as appropriate. This privacy notice was last update in January 2024.

The University's Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to personal data and can be contacted at dataprotection@rau.ac.uk

You can also contact the DPO if you have any queries or concerns about the University's processing of your personal data. You have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk/concerns

If you have any questions regarding this privacy notice please do not hesitate to contact us on 01285 652531 or studentservices@rau.ac.uk