
APPENDIX D: USING AND PROTECTING STUDENT PERSONAL DATA

How and why does the College use students' personal data?

1. It is an essential feature of all organisations providing a continuing service to specific people that they obtain and retain data about those individuals. The purposes of this in the College are:
 - (a) to enable the College to administer student-related functions from original application through to graduation and beyond in order to manage the ongoing relationship with graduates/alumni;
 - (b) to plan and account for the use of the services provided;
 - (c) to produce information including statistics for such agencies as the Higher Education Statistical Agency (HESA) and the Higher Education Funding Council for England (HEFCE), which allocates funds to universities on the basis of student numbers and the NHS which funds students;
 - (d) to enable College staff to identify and communicate with students, while attending the College and after leaving;
 - (e) to monitor academic progress over a period of time towards qualifications;
 - (f) to carry out assessment and authorise awards and for verification of awards in the long term;
 - (g) to monitor complaints, disciplinary cases and academic appeals;
 - (h) to provide student support services, including student financial support services (bursaries, loans etc.) and IT and learning resources;
 - (i) to contact other institutions to confirm previous qualifications obtained;
 - (j) to comply with immigration compliance checks regarding sponsored migrants; and
 - (k) to monitor equality of opportunity and to promote equality and diversity within the College.

Which personal data does the College collect?

2. The College's files include the following categories of data:
 - (a) Details of telephone and email enquiries:
 - Name and address.
 - Telephone numbers (home, work, mobile).
 - Area of interest.
 - Source of information.
 - Age/date of birth.

- Gender.
 - Email address.
 - Disability*.
- (b) Details from application forms:
- Name and address.
 - Telephone numbers.
 - Email address.
 - Age/date of birth.
 - Gender.
 - Nationality and country of residence.
 - Area of permanent residence.
 - Educational records to date.
 - Academic references (including personal statement and predictive grades).
 - Disability*.
 - Criminal convictions*.
- (c) Further data collected at enrolment or updated during a student's time at the College:
- Home address and next of kin.
 - Address while attending College.
 - Entry and other qualifications.
 - Demographic information.
 - Funding, bursary and fee-related information.
 - Disability*.
 - Programme and stage details.
 - Attendance, progress and current status.
 - Final results.
 - Module results.
 - Student photographs.
 - Banking details.
 - National Insurance number or NHS staff number (NHS-funded students only).
- (d) Data collected purely for monitoring equality of opportunity and other statutory monitoring and reporting purposes:
- Religion*.
 - Parental occupation.

- Parental education.
 - Transgender*.
 - Sexual orientation*.
 - Ethnic origin*.
 - Social class.
- (e) International students (outside EU): Data collected for visa and immigration purposes:
- Passport details.
 - Evidence used in obtaining a visa from the Home Office/UK immigration agencies.
 - Visa details.
 - Data to evidence attendance on course of study.

***These types of data are classified as sensitive personal data under the Data Protection Act 1998 and as such are subject to a greater level of control.**

3. Additional information may be collected by Departments and Faculties in relation to placements, professional body requirements, extenuating circumstances applications, appeals, complaints, disciplinary cases and optional student services provided by the College.

Privacy, access, disclosure and safeguards

Privacy and access

4. Students have the right to privacy of personal data. Access to all student data within the College, whether on paper, computer files or other storage media, is strictly controlled.
5. Sensitive personal data is always treated with even greater care. Data collected in relation to specific services or purposes may also be subject to additional confidentiality agreements and controls, for example services like Student Wellbeing, Disabled Student Support, Student Advice and Information and Student Financial Support are covered by additional personal data policies which set out in more detail how the data will be used.
6. Disclosure of personal data: How the College handles enquiries about students the College's standard response to enquiries about individuals is that information cannot be disclosed without the student's authority, except to:
- (a) College staff who need it for administrative, teaching or assessment purposes. This includes staff in the College's overseas offices;
 - (b) government departments and other bodies responsible for public funding, including the UK department for Business, Innovation and Skills (BIS) ,

HEFCE, HESA, Teach First, National College of Teaching and Learning and other bodies funded by it, the NHS and the Department of Health for statistical, monitoring and audit purposes and where the College is required to participate in national surveys of students and graduates such as the National Student Survey (NSS) and the Destinations of Leavers from Higher Education Survey (DLHE);

- (c) validating and professional bodies in connection with registration and awards;
- (d) a collaborating organisation that provides teaching, assessment or student support for a College course (only for students enrolled on a course offered in conjunction with that collaborating organisation);
- (e) external examiners for examination, assessment, and moderation purposes;
- (f) bona fide research workers, if approved by the Academic Registrar or nominated authority, after consultation where necessary with GSM London Student Union;
- (g) the College's insurers and legal advisers;
- (h) the Home Office and relevant UK immigration agencies regarding sponsored migrants;
- (i) international recruitment consultants and agents (regarding the students they recruit);
- (j) the Student Loans Company (SLC) and appropriate student funding organisations (e.g. Student Finance England) regarding grants, fees, loans and bursaries;
- (k) callers in emergencies only and subject to the conditions in paragraph 10) below;
- (l) the courts, the police and other organisations with a crime-prevention or law-enforcement function, subject to the conditions in paragraph 11) below;
- (m) the Benefits Agency as required by the Social Security Administration Act 1992;
- (n) electoral registration officers for the compilation of the electoral register as required by Regulation 23 of the Representation of the People (England and Wales) Regulations 2001;
- (o) the Office for National Statistics for the purposes of conducting the national census;
- (p) councils for the purpose of assessing and collecting council tax;

- (q) other local authorities,
and additionally, where relevant and necessary, information on a student's progress, achievement, attendance and conduct may be provided:
 - (r) in confidential references in connection with applications for employment or further education;
 - (s) to employers or others formally sponsoring students; and
 - (t) to embassies and consulates.
7. The College routinely shares with GSM London Students' Union the personal data of students and new students who are expected to enrol at the College. The information comprises contact details, student number, information about course and about status (e.g. home/international, current/withdrawn, expected course end date) to enable the Union to enrol members, contact members, plan and promote its services, facilitate elections for student course reps and officers, and for the administration of the student rep system, student societies, volunteering programmes and the Hallam Award. In addition, students' date of birth is provided to manage the membership of under eighteen (18) year olds. A limited amount of information about disability and ethnicity is provided along with information about gender. This information is provided solely for the purpose of monitoring the equality of opportunity within GSM London Students' Union. Students may opt out of membership of the Union by writing to the Pro-Provost (Student Experience and External Engagement). Please see the Code of Practice relating to the Operation of the Students' Union for more information.
8. To facilitate council tax exemptions and reductions for its students, the College routinely provides information to the following councils: Greenwich and Ealing, and may provide it to other councils on request.

Enquiries from parents and family

9. The College's policy regarding confidentiality applies equally to enquiries from parents, guardians and other family members. Please see the statement to family members.

Emergencies

10. In the event of an enquiry in an emergency where, in the College's judgement, it is in the student's interests to disclose information and where it is not possible to obtain the student's authority, the College Secretary and Academic Registrar or nominee will agree to provide the minimum necessary details to assist the enquirer, having first confirmed their credentials.

Police enquiries and other organisations responsible for investigating crime

11. It may be that the police or other organisation (with a crime-prevention or law-enforcement function, e.g. Department for Work and Pensions Benefit Fraud Section) are investigating a criminal offence in which a student may be involved. If so, the matter will be passed to the Data Protection Officer or other designated senior person for a decision on the release of information.

Graduation

12. The College believes that its students are proud to gain their awards. Thus information on the final award gained by each student will be published unless students explicitly ask the College to withhold the data. Students are asked to confirm they are willing for this information to be disclosed as part of the College's administration of graduation.

Contractors

13. It may be that the College outsources work to contractors that involves their use of personal data on its behalf. If so, it will ensure that appropriate contracts or data-sharing agreements are in place and that the contractors process personal data in line with the Data Protection Act and other applicable legislation.

Responsibilities

14. The College will:
 - (a) set up and maintain student records promptly and accurately on receiving enrolment and amendment details;
 - (b) safeguard the privacy of individual students via a strict non-disclosure policy;
 - (c) comply with all legal provisions in protecting data on computers or in other formats from unauthorised access or use.
15. To help the College maintain meaningful records, students must:
 - (a) provide accurate information at enrolment and update as required;
 - (b) update their address and telephone number on the Student Portal to ensure that the College holds correct contact details;
 - (c) notify the College in writing if they intend to withdraw from or interrupt their study.
16. In addition, students who use personal data for their coursework will need to abide by the College's Data Protection Policy Statement and should read Use of Personal Data by Students.

The Data Protection Act 1998

17. Personal data supplied to the College will be used in line with the Data Protection Act 1998 and other applicable legislation. The Data Protection Act governs the way organisations like the College use personal data and places controls on accuracy, access and security of personal data. The College ensures that agents acting on its behalf also comply with the Act.
18. Like other organisations, the College registers each year with the Information Commissioner. The College's entry can be found on the public register. The College's registration number is: Z745611X.
19. The College has a Data Protection Policy Statement. Individuals have a number of rights regarding how the College and other organisations may use their personal data. These include the following:
 - (a) to find out what information the College holds about you – the right of subject access;
 - (b) to have inaccurate information about you amended or destroyed;
 - (c) to object to your data being processed if the processing is likely to cause you or someone else to suffer substantial damage or distress that is unjustified.
20. For more information about your rights, see Individual Rights and Subject Access. Please contact Data.Protection@gsmlondon.ac.uk or tel. +44 (0)20 8516 7838 (ext. 1738) if you have any data-protection queries or complaints.

How long does the College keep students' personal data?

21. Under the Data Protection Act, the College may not keep your data for longer than is necessary. In some instances this means that data is not kept for very long, but in other cases there are good reasons for the College to keep it for some time after you have left the College. These purposes include the following:
 - (a) so that your award can be verified in the long term;
 - (b) to produce transcripts and references;
 - (c) for the administration of graduation ceremonies;
 - (d) for alumni services and ongoing relationship with the College;
 - (e) for careers and employment services;
 - (f) to deal with complaints, appeals, and disciplinary cases;
 - (g) for statutory reporting purposes and to complete statutory surveys such as the Destinations of Leavers from Higher Education Surveys.

22. In addition, the College is subject to certain statutory requirements and audits. More information about the retention of student records can be found in the College's Records Retention Schedule.

Related documents, policies and guidance

23. This policy forms part of the Student Terms and Conditions. Further information about the College's collection, use and retention of personal data is contained in the following documents:
- (a) Data Protection Policy Statement.
 - (b) HESA Collection Notice – some information held about you by the College will be sent to the Higher Education Statistics Agency (HESA). This statement sets out how HESA use this data.
 - (c) Individual Rights and Subject Access – information about the rights of individuals under the Data Protection Act, in particular the right of subject access that allows individuals to request copies of their personal data held by the College.
 - (d) Use of Personal Data by Students – guidance for students who use personal data in their coursework.
 - (e) Monitoring Policy – information about the instances when the College may monitor staff and students, how this is done, and how the data may be used.
 - (f) Records Retention Schedule – lists the retention periods of records held by the College.