



DATA COLLECTION NOTICE

Senior Manager Responsible	Assistant Principal (Curriculum)		
Author Name	Jonathan Burgess	Author Job Title	Deputy Director of the University Centre
Approval body	CLT		
Date approved	January 2020	Date of next review	January 2023

MISSION STATEMENT

Holy Cross, founded by the Daughters of the [Cross](#), is a Catholic Sixth Form College and University Centre, which exists to provide a high quality education within a community based on Gospel values. The College provides the opportunity for each person spiritually, morally and intellectually and welcomes students and staff of all faiths

1. INTRODUCTION

The Holy Cross University Centre (UC) and Sixth Form College (SFC) need to collect and process personal data in order to meet statutory requirements, function effectively as an educational institution and provide students with the support they require while undertaking their studies. This notice explains how the UC and SFC collects, uses and shares personal data relating to current and former students ('you'/your) and your rights in relation to the processing of your personal data.

2. THE LAW

The information we collect is '*personal data*' and there are laws which cover how we collect, hold, store and disclose your personal data. The relevant law is contained in the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA). This Data Collection Notice has been developed to be compliant with the obligations set out in these laws. The UC will ensure that all types of personal data held about you is managed and processed in accordance with prevailing data protection law.

3. PERSONAL DATA

Information we collect and use which is *personal data* includes, but is not limited to, the following:

- a. your unique UC, SFC and Liverpool Hope University (LHU) student ID number and other examples of unique system IDs (e.g. UCAS personal ID, SFE SSN numbers);
- b. contact information (including name, term-time and home addresses, date of birth, phone number(s) and email addresses);
- c. emergency contact details (please ensure you have their permission to pass these on to us, and we have your permission to contact them in an emergency);
- d. nationality / residential status (resident in UK for 3 years or more);
- e. employment status (this data is only used to demonstrate how the course may have helped improve the employability of Learners);
- f. previous education / qualifications;
- g. vehicle information;
- h. identification photographs;
- i. information provided by you as part of your application to study at the UC or SFC, or created during the application process (e.g. Initial Assessment scores and comments);
- j. financial information;
- k. attendance information;
- l. EU Passport, Driving Licence, Birth Certificate number (or equivalent identification document)
- m. academic marks and progress;
- n. information provided in relation to extenuating circumstances, appeals and complaints;
- o. references;
- p. disciplinary information;
- q. caring responsibilities;
- r. other legitimate personal data relating to academic and pastoral support.

4. SENSITIVE PERSONAL DATA

We may also collect, or you may choose to provide us with, the following special categories of more sensitive personal data:

- a. race or ethnicity, religious beliefs, sexual orientation and political opinions;
- b. health, including any disability or medical condition, and dietary requirements;
- c. criminal convictions or offences.

We collect this kind of information to meet government requirements and to carry out monitoring of how well we are meeting the needs of students including equal opportunities. We also use it to ensure we give appropriate support to students with disabilities and students from other groups which are under-represented in our UC and SFC. These types of personal data require us to take additional steps to ensure their security and confidentiality.

5. ENROLMENT

The UC, SFC and LHU will collect information from you at enrolment either through an online process or by completion of a hard copy enrolment form and through relevant admissions processes. The information collected is to maintain student records and to support the administration of the UC and SFC. We will share information with Faculties and Departments only as required to support the operational needs of the UC and SFC. The data collected relates to all students registered with the UC and SFC, including those registered as UC students but taught at another institution or organisation as part of a collaborative arrangement or an exchange programme. During your enrolment, we will ask you to confirm acceptance of your contract with the UC or your learning agreement with the SFC and to read and accept this Data Collection Notice. By entering into a contract with the UC or SFC you are agreeing:

- a. to your details being entered into and stored securely on the UC or SFC Student Records Database and for UC students within the University administration system.
- b. to confirm that you will be liable for any tuition fees;
- c. to comply with all University and College Regulations, Rules, Codes, Conditions, Policies and Procedures;
- d. to share your name, course of study, contact details and any other legitimate relevant information with the agencies referred to in this Data Collection Notice;
- e. that you understand the purposes for which the information you provide is being used; and
- f. that to the best of your knowledge the information is correct.

A digital photograph of you is taken at enrolment, stored on your student record and printed on your ID Card for identification purposes. This photograph may also be used on class lists and examination registers. In addition, it may be shared with the police in certain circumstances.

We will ask you to provide information which we use for equal opportunities monitoring. You **do not have to comply** with this request but if you do you are agreeing to the UC and SFC returning the data to organisations such as Office for Students (OfS) and Higher Education Statistics Agency (HESA) as part of a statutory statistical return.

6. USING YOUR DATA WITHIN THE UC AND SFC

The SFC, UC and LHU will process your personal data, including sensitive personal data, for a range of purposes including:

- a. the creation and maintenance of a student record;
- b. general administration relating to teaching, assessment, student recruitment, careers service support, health and safety, marketing or for ensuring the quality of what we do;
- c. the collection and analysis of statistics which help us to know what we are doing well and where we need to improve or provide additional support for students; and
- d. investigation of matters relating to our rules and regulations for example academic misconduct in assessments, student discipline or complaints.

7. STUDENTS WITH DISABILITIES

If you provide information concerning a disability we will share this with appropriate employees of the UC, SFC and LHU to ensure that suitable arrangements can be made for you. Sharing of personal data in such circumstances will be kept to a minimum. If you would not like us to share this information, or would like to limit the amount of information we share, please notify your Support/Progress Tutor.

8. UNIVERSITY CENTRE PUBLICATIONS

If you do not want your name to be included in University or UC publications e.g. on Graduation or on Alumni lists, you can ask for your name to be excluded. You should make a request in writing to the Admin Team at the UC.

9. SHARING DATA OUTSIDE THE UC AND SFC

The UC and SFC are required to collect and process certain information about you to external agencies. Where personal information is sent, any documents shared are password protected to ensure compliance with GDPR.

9.1 Government Agencies

Records made up of mainly coded information, or parts of it, will be passed to Government Agencies as part of a statistical return needed to enable them to carry out their legal obligations in relation to the funding and/or quality assurance of education. The Government Agencies such as:

- a. Department for Education
- b. Welsh / Scottish Government
- c. Department for the Economy
- d. Office for Students (OfS) and their designated bodies
- e. Higher Education Funding Council for Wales
- f. Scottish Further and Higher Education Funding Council
- g. Education and Skills Funding Agency

9.2 Auditing

The University, UC, SFC or Government, or their respective agents, may check the accuracy of personal information provided by students against external data sources.

9.3 Funding and Sponsors – UC only

Information about registration and progression will, depending on your course, be passed to organisations such as the Student Loan Company / Student Finance England. We pass on this information for funding purposes. If you receive sponsorship for your University education, attendance and results may be passed to your sponsor.

9.4 Debt recovery – UC only

We will pass information to the College's external debt collector but only sufficient information to enable the College to take action against students who have not paid their fees.

9.5 National Student Survey (NSS) and Graduate Outcomes Survey (GOS) – UC only

Each year the Office for Students (OfS) or their representative carries out the National Student Survey (NSS), which asks the views of final year undergraduate students. The OfS, or a nominated agency, may contact you to participate in the NSS and this information will be used only for that purpose. Further details are available from www.thestudentsurvey.com/. When you graduate, data about you will be collected by the Higher Education Statistics Agency (HESA). This is for the Graduate Outcomes Survey (GOS) relating to what graduates do after leaving UC. You may also be contacted by HESA,

to take part in a longitudinal survey. If you wish to opt out of these surveys, please e-mail university admin to let us know at universityadmin@holycross.ac.uk.

9.6 Graduate Prospects – UC only

The registration data you provide to us is held in computer and other filing systems and is shared with:

- a. the University Careers Centre;
- b. Graduate Prospects; and
- c. other accredited organisations.

When storing or sharing your data we will act in accordance with the provisions of the Data Protection Act 2018.

9.6 Plagiarism Software

When you submit your assessed work it may be submitted to a Plagiarism Detection software database.

9.7 SMS Text Messaging including Emergency Situations

The UC or SFC may contact you by text message via an external provider. We may use text messaging to contact you in a range of circumstances including:

- a. cancellations or changes to the teaching timetable;
- b. cancellation or changes to the arrangements for placements;
- c. advising or reminding you of an appointment or deadline; or
- d. in emergency situations.

9.8 Students' Union – UC only

When you join a course, you will automatically become a member of the relevant University Students' Union. The Students' Union manages data in accordance with the DPA and other information security legislation. You can opt out of membership by contacting the Students' Union.

9.9 Disclosure and Barring Service (DBS) – UC only

The law requires the UC to undertake a Disclosure and Barring (DBS) check on students who are involved in '*regulated activities*'. These include working with children or vulnerable adults. During the Disclosure and Barring process, the UC may transfer your personal information to the Disclosure and Barring Service to allow routine vetting to take place. Under the Safeguarding Vulnerable Groups Act 2006 the UC may also share information, this however will be kept to a minimum and where this includes sensitive personal data, the UC will ask for your consent.

9.10 Placement Students

If your course of study involves a placement element we will need to share your personal data with placement providers in order to allow arrangements to be made for your placement. Sharing of data in such circumstances is kept to a minimum. If your data includes sensitive personal data, we will ask you for your consent before we release it.

9.11 Disclosure of your status as a student

We will disclose information about your status as a student to:

- a. the Department for Work and Pensions (DWP) in connection with applications for benefits or as part of a criminal investigation;
- b. local authorities in connection with council tax, electoral registration and for investigating benefit fraud;
- c. the police and the courts;
- d. United Kingdom Visa and Immigration service.
- e. We may disclose information to other organisations not listed but only if there is a legitimate reason for doing so.

10. HOW LONG THE UC AND SFC WILL RETAIN YOUR PERSONAL DATA

The UC 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 UC and SFC has taken into account:

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

11. ACCESS TO YOUR PERSONAL DATA: YOUR RIGHTS

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

a. 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 UC or SFC is processing it lawfully and fairly.

b. Correction

You have the right to request correction of any inaccurate or incomplete personal data held about you.

c. Deletion

You have the right to request erasure of any personal data held about you where there is no good reason for the UC or SFC to continue processing it, or where you have exercised your right to object to the processing of your personal data.

d. Restriction

You have the right to request restriction of how the UC or SFC processes your personal data, for example, to confirm its accuracy or the UC's/SFC's reasons for holding it or as an alternative to its erasure.

e. Objection

You have the right to object to the UC's or SFC's processing of any personal data which is based on the legitimate interests of the UC or SFC, or those of a third party, relating to your particular circumstances. You also have the right to object to the UC or SFC processing your personal data for direct marketing purposes.

f. Portability

You have the right to receive or request that the UC or SFC transfers a copy of your personal data in an electronic format where the basis of the UC or SFC processing such personal data is by your consent or the performance of a contract, and the information is processed by automated means.

To exercise any of your rights you will need to contact the UC's Admin Team or your Progress Tutor in the SFC. The UC or SFC may be entitled to refuse any request in certain circumstances and you will be notified accordingly where this is the case. Where the lawful ground relied upon by the UC or SFC 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 UC or SFC 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 UC or SFC may charge a reasonable fee or

Data Collection Notice

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 UC may ask you to verify your identity before fulfilling any request in relation to your personal data. UC students also have the right to see a copy of the data held by HESA or if you have any concerns or objections to the use of data please contact: HESA at www.hesa.ac.uk/fpn or by writing to 95 Promenade, Cheltenham, GL50 1HZ. The HESA privacy notice for students – the 'Student Collection Notice' is published at

<https://www.hesa.ac.uk/about/regulation/dataprotection/notices>.

If you are dissatisfied with the UC's or SFC's collection, processing or handling of your data and/or related requests from you, you have the right to complain to the Information Commissioner's Office (ICO).

12. **HELP AND ADVICE**

If you have any queries regarding your personal data held by the UC or SFC, please contact the Director of the University Centre or the Deputy Principal of the SFC. The Information Commissioner's Office website (www.ico.org.uk) contains helpful information about data protection.

13. **AMENDMENTS**

The College may have to amend policies and procedures from time to time. The website will be kept up to date to reflect this. If we amend anything that materially impacts on your study, we will let you know and, where appropriate, involve you or your representative(s) in a consultation process. Policies and procedures will only be changed with the knowledge and approval of the Core Leadership Team and/or Governing Body of the College.