

EDINBURGH NAPIER UNIVERSITY

PRIVACY NOTICE FOR STUDENTS 2017/18

COLLECTION AND USE OF YOUR DATA

Edinburgh Napier University (the University) is registered under the Data Protection Act 1998 (the Act) to collect and retain in a variety of formats, personal data which you have given us, we have processed or we have received from other sources e.g. UCAS, referees and employers. Since the University could not fulfil its education, training, support and employability remits or carry out its business activities without using your data, by matriculating as a student with us you are agreeing to the University's use of your personal data for these broad purposes:

- To administer all aspects of your studies at the University e.g. admission, annual matriculation, supervision, attendance, attainment, progress, assessment and graduation, including any appeals, extenuating circumstances, complaint or disciplinary matters which may arise
- To provide you with advice and support on academic, careers, pastoral and any relevant funding matters
- To administer the financial aspects of your payment of fees and student rents and our collection of debts owed
- For the management of University services, including computing, library, student accommodation, [EN]GAGE facilities and campus car parks
- To compile records and statistics for research and audit purposes and management information
- To monitor equal opportunities legislation and policies
- For alumni activities, including fundraising

[Layered privacy notices](#) for specific processing activities are provided in addition to this document.

Please note: As from 25 May 2018 the Data Protection Act 1998 will be replaced by the EU General Data Protection Regulation 2016. The University is currently preparing for the new legislation and will update this document on the 24 May 2018.

ACCESS TO AND DISCLOSURE OF YOUR DATA

The University undertakes to maintain your information securely and will restrict access to employees, our professional advisers, authorised agents, contractors and data processors on a strictly need to know basis. We will only disclose your data to additional external third parties where we:

- have your consent; or
- are required to do so under a statutory or legal obligation; or
- are permitted to do so by the Act.

To fulfil our statutory or legal obligations we will provide your data as permitted under the Act to these authorised bodies or agents acting on their behalf:

- The Higher Education Statistics Agency ([HESA](#))
- Other Government departments and agencies
- Local education authorities
- The City of Edinburgh Council Tax department
- The Scottish Funding Council (SFC)
- The Student Loans Company (SLC)
- The Student Awards Agency for Scotland (SAAS)

- The Home Office UK Visas and Immigration Agency¹
- Lothian Electoral Registration Officer

We may also disclose relevant information as permitted under the Act to:

- Current or potential employers and placement providers
- Professional and regulatory bodies
- Former school attended, relevant HE and FE institutions and other educational partners in the UK and overseas
- Formal student sponsors
- The Police or other authorised officers for the purposes of criminal and civil proceedings
- The University's professional advisers including for legal and insurance purposes
- Edinburgh Napier Students' Association (ENSA)
- The Open University for the Back on Course Project, which offers impartial information, advice & guidance to students who withdraw early from their studies*
- The Scottish Wider Access Programme (SWAP), which gives independent advice to adults about accessing higher education through SWAP Access courses, for the purposes of tracking students throughout their studies at the University*
- The Lothians Equal Access Programme for School (LEAPS)/Schools for Higher Education Programme (SHEP), which provides support and advice to eligible students to help them achieve entry to Higher Education, for the purposes of tracking students throughout their studies at the University*

*We will contact relevant students at the appropriate times to advise about the data to be transferred and offer an opt-out before personal details are provided

OTHER USES OF YOUR PERSONAL DATA

Surveys

Your data may be used for these surveys:

- The [National Student Survey](#) (NSS): we will contact you at the appropriate time to offer you an opt-out of taking part in this survey before your personal details are transferred;
- The Graduate Outcomes Survey is a national survey of everyone who has recently qualified from any university or HE college in the UK, which is done by the University on behalf of the [Higher Education Statistics Agency](#) (HESA). You will be contacted 15 months after you have left the University about the survey, by a survey contractor commissioned by HESA on behalf of the University. You can opt-out of this survey by emailing student.surveys@napier.ac.uk.
- Other surveys on student issues which you are informed about in the matriculation process

Sensitive Personal Data

Where you have given us [sensitive personal data](#) e.g. about your ethnic origin, a disability or health related matter, this data will be used strictly as permitted under the Act to comply with the requirements of regulatory bodies (e.g. HESA) and equal opportunities legislation. Appropriate details of your disability will be shared in accordance with the University's [Data Protection Code of Practice](#) with relevant University staff on a need to know basis, to provide you with the best possible support for your studies. Further information on equality and diversity at the University is available [here](#).

Graduation ceremonies

The University's Graduation ceremonies are regarded as public events. All students who are intending to graduate or may be eligible for an award, and whether attending a ceremony or not, must read the [Graduations' Data Protection Statement](#) for information about the uses of personal data.

¹If you are an overseas, non EEA student, the University will provide your data to the UK Visas and Immigration Agency under the Points Based Immigration System. Our reporting requirements are explained in Annex 2 of the Agency's [Guidance](#)

Online educational tools: Turnitin®UK and GradeMark® UK

Throughout your studies at the University, your work may be submitted to **Turnitin®UK**, a text matching tool for assessment and referencing practice and/or **GradeMark® UK**, an essay marking tool. More information on both services is available [here](#).

CCTV and body worn radio audio recordings

The University's premises, student residential accommodation and grounds are monitored by CCTV systems for the purposes of public safety, security and the prevention and detection of crime. CCTV footage may also be used for investigations or proceedings arising under the University's Complaints Handling Procedure, Student Conduct Regulations and the Student Accommodation Code of Conduct.

In the event of a serious incident arising and strictly in accordance with University procedures, the University's Security Officers may make body worn radio audio recordings, which may be used in criminal investigations or investigations or proceedings arising under the University's Complaints Handling Procedure, Student Conduct Regulations and the Student Accommodation Code of Conduct.

Recording of lectures

The University's policy on [Recording of Learning & Teaching Activities](#) sets out the requirements for audio and visual recording of lectures and other classroom activity.

Freedom of Information (Scotland) Act 2002 (FOISA)

Please note that under FOISA, in exceptional circumstances we may release personal data where the public interest outweighs your individual right to privacy. The University regularly provides statistical information as required by FOISA.

HOW WE WILL CONTACT YOU

We may contact you by telephone, email or post. In addition, the University has a system for contacting all students by text message (SMS) in the event of an emergency or urgent situation arising. By providing your mobile phone number you consent to being contacted in this way. If we decide to use SMS for other legitimate purposes we will seek your consent in advance where this is required.

The University will use the email address it provides you with (e.g. [your matriculation number]@live.napier.ac.uk) to keep you updated with University related information.

RETENTION OF YOUR PERSONAL DATA

When you leave the University, appropriate data will be kept permanently in our student archive in accordance with our [records' retention schedules](#).

YOUR RESPONSIBILITIES WITH REGARD TO DATA PROTECTION

These include to:

- Keep your personal details up to date
- Process personal data for your studies/research strictly in accordance with the University's [Data Protection Code of Practice](#) and where relevant any ethical or professional Codes

YOUR RIGHTS UNDER THE ACT

These include to:

- Apply for rectification where your data is incorrect
- Take steps to prevent processing which may cause you harm or distress
- Have access to your personal data

FURTHER INFORMATION

- You can check on or change your consent status [here](#).
- For any queries or concerns about the use or accuracy of your data or if you would like more information about your rights and how to exercise them contact [Governance Services](#).
- Visit [MyNapier](#)
- Visit the [UK Information Commissioner's site](#)

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