

## EDINBURGH NAPIER UNIVERSITY

### LAYERED PRIVACY NOTICE FOR STUDENTS

#### **Activity/Processing being undertaken: Graduate Apprenticeship Programme**

Edinburgh Napier University is providing you with this information in order for us to comply with the General Data Protection Regulation (EU) 2016/679, which requires us to tell you what we do with your personal information.

#### **Who is collecting the information?**

Edinburgh Napier University as the “Data Controller”.

#### **Who are we sharing your Personal Data with (externally)?**

Your Employer – we will share information on your attendance and progress with your employer (see section below for information on the purposes for sharing this information) but we will not share any of the details you have provided on the enclosed Equality Monitoring form.

Skills Development Scotland – We will share progress reports with SDS and anonymised data extracted from the Equality Monitoring form.

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

- Have your consent
- Are required to do so under a statutory or legal obligation, or
- Are permitted to do so by Data Protection legislation.

#### **What information are we collecting and what we are doing with it (purposes)?**

- Name, contact details, employment and qualification history
  - To process your application and administer your matriculation at the University
- Equality monitoring data (ethnic origin, a disability or health related matter)
  - This data will be used strictly as permitted under the legislation 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. This data will not be shared with your employer but anonymised version of the data will be shared with SDS for statistical purposes
- Carer/Care leaver status
  - To provide you with details of available support
- Attendance and progress – At the point of two or more unexplained absences this will be shared with your employer as will information on your grades, level of achievement/progress and feedback.

- This is to ensure you are appropriately supported by the University and your employer

### **What is the legal basis for processing?**

Article 6(1)(e): for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller, namely the University's Statutory Instruments: "for the objects of providing education, carrying out research, and promoting teaching, research and general scholarship" and the administration thereof.

Article 6(1)(c) where processing is necessary for compliance with a legal obligation to which the controller is subject.

### **How are we collecting this information?**

From you directly via the enclosed forms.

From University internal systems and processes.

### **Who can see your information within the University?**

Graduate Apprenticeship Programme Leaders, Module Leaders, Employer Liaison Officers, administrators, Work-based Learning Lecturers, Programme Boards

### **How long is your information kept?**

6 years after leaving date. Further information can be found online at:

<https://staff.napier.ac.uk/services/governance-compliance/governance/records/Pages/RecordsRetentionSchedules.aspx>

### **How secure is your information?**

For services provided locally by Information Services, information is stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies and redundant hardware. Information on these servers is backed up regularly. The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy or your personal data.

The University makes use of a number of third party, including "cloud", services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation.

Information transferred to SDS is done so via a secure, two factor authenticated, file transfer system.

### **Who keeps your information updated?**

Yourself by notifying the University of any changes to your details.

Graduate Apprenticeship administrator and other University administrators depending on the information.

**Will your information be used for any automated decision making or profiling?**

No.

**Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.**

No.

**Is any other information available?**

You can access all the University's privacy notices using the following link:

<https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx>.

You can find out who to contact if you have any further queries about Data Protection and about your rights using the following link:

<https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx>

**You can view the full Student Privacy Notice at the web address below. You will also have the opportunity to read this when you matriculate.**

<https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx>

**If you have any questions please email [ga@napier.ac.uk](mailto:ga@napier.ac.uk)**