

BU Privacy Notice: Students

In sections 4 and 5 of this Notice, the main text gives an outline of the processing activity and a symbol to show the legal basis of that processing. The paragraphs marked “**More information**” provide further information about how and why the processing is undertaken and a full description of the legal basis for it.

BU’s **Data Protection Officer** (“DPO”) has oversight over data protection matters within BU. If you have any questions about this Notice, or any queries or comments on the processing described in this Notice, you can contact the DPO on dpo@bournemouth.ac.uk, 01202 962472 or Poole House, Bournemouth University, Fern Barrow, Poole BH125BB.

Changes to this Notice: we review and update this Notice at the start of each academic year, and sometimes we will make changes at other times. You will be given access to the updated Notice at on-line registration. Significant changes during the year will be notified to you using your BU email address and through the Student Portal.

Notification of changes to your data: Please tell us promptly about any changes to the data we hold about you. This is particularly important for your contact details.

Privacy Notice Contents

1. Introduction:
 - a. What is this Notice?
 - b. What is data protection?
 - c. Using this Notice
 - d. Understanding the legal basis for processing of your data
2. When and how we collect your data
3. How we hold your data
4. How and why we process your data for BU purposes
5. Sharing your data with third parties
6. Transfer of your data outside the European Economic Area (EEA)
7. Retention: how long will we keep your data for?
8. Your rights as a data subject and how to exercise them

1. Introduction

(a) What is this Notice?

This Notice covers information about BU Students. This includes any person who has firmly accepted an offer to study at BU, as well as anyone registering/ already registered on a credit-bearing course of study provided by BU. As we hold information in a form that identifies individuals, it is “personal data” [often referred to as “data” in this Notice].

In this Notice, “BU” “we”, “our” and “us” refers to Bournemouth University Higher Education Corporation. We have a separate Privacy Notice covering information relating to student recruitment (including enquiries about potential study at BU and events for those considering studying at BU) and our admissions process: you can refer to this for information about how your data was processed by BU before you became a BU Student.

We also have separate Privacy Notices relating to BU Alumni information, BU Staff, individuals interested in BU public events or making general enquiries and individuals participating in BU research projects. All of the Privacy Notices mentioned here can be accessed through the main Data Protection Page on our website. If you are a BU student who is also employed by BU in any capacity, the processing of your data in relation to your employment is covered by the BU Staff Privacy Notice.

More information: The purpose of this Notice is to enable you to understand the scope of the personal data which BU holds and uses that relates to you personally, and how this data will be handled by us. It covers use of your information within BU and the circumstances in which we will share your data with other organisations.

We think it is important that you can understand how and why we use your data. We are also required by law to give you specific information about the processing of your data.

For this reason, and because BU is a large organisation which needs to collect and use personal data for a range of purposes, this Notice is quite long. It contains some technical legal language. We have tried to make the Notice as clear as possible and provide signposting so that you can find the information most relevant to you. See section (c) below for guidance on how to use the Notice.

(b) What is data protection?

Personal data is information relating to identifiable living individuals (known as “data subjects”). Use of personal data (including collecting data, sharing data or just holding it in files) is referred to as “data processing”. To protect your interests and rights, organisations do not have complete freedom in how they use your personal data. They have to comply with data protection laws, which apply restrictions on when and how personal data can be processed. Processing of personal data is lawful only if it meets certain requirements or conditions. These are concerned with the purpose of the processing and how it is carried out.

More information: Current data protection laws are set out in the UK's Data Protection Act 2018. This Act incorporates most the provisions which came into force in the EU General Data Protection Regulation (called "GDPR") so that they continue to apply within the UK following our exit from the EU.

Under these laws, BU is the data controller of the information it collects and processes as described in this Notice. This means that it has the core legal responsibility to safeguard the information and ensure it is processed lawfully.

BU must:

- Take steps to ensure that the data it processes is accurate and up to date;
- Give you clear information about its processing of your data, in one or more Privacy Notices like this one;
- Only process your data for specific purposes described to you in a Privacy Notice, and only share your data with third parties as provided for in a Privacy Notice;
- Keep your data secure; and
- Respond within set timescales to certain enquiries or requests from individuals about the use of their data.

Information about your data protection rights as an individual is set out in section 8 of this Notice.

(c) Using this Notice

Sections 4 and 5 of this Notice identify and explain the data processing and data sharing carried out by BU.

In these sections, where we describe a particular use of your data you will see a summary description of the processing and a colour-coded indicator of the legal basis of the processing (these are explained below). This first level of information will also describe any use or sharing of your data which we particularly need to highlight to you. You can then choose whether to read the "More information" text which gives a more detailed layer of information about the processing and its legal basis.

(d) Understanding the legal basis for processing of your data

BU is using colour coding to provide a quick, easily-accessible indication of the legal basis for processing. This box explains how the colour coding in this Notice links to the conditions set out in the GDPR: references to Articles are to the relevant provisions within the GDPR. Further information about the basis of a specific category of processing can usually be obtained by reading the "More information" text in sections 4 and 5 of this Notice.

More information: Conditions of processing any personal data



Necessary for the performance of a contract between you and BU: this will be either the core contract between us for the delivery of your course or an additional contract for other services. The terms of the BU Student Agreement can be found

here: <https://www.bournemouth.ac.uk/students/help-advice/important-information> [Art 6.1(b)]



Necessary for compliance with a legal obligation on BU: we will identify the relevant obligation [Art 6.1(c)]



Necessary for the performance of a task carried out in the public interest: this will usually refer to an activity within BU's core purpose as a statutory higher education corporation, to deliver higher education and carry out research. Sometimes it may refer to a public interest task pursued by another organisation [Art 6.1(e)]



Consent: this means that you have agreed that we can use your data for this specific purpose. You are able to withdraw your consent at any time. When you are asked for consent, you will also be given details of who to contact to withdraw your consent.



Necessary for legitimate interests pursued by BU or another organisation, where BU has determined that the processing represents an appropriate balance between its aims and your interests, rights and freedoms as a data subject. Where this applies, we will identify the purpose we are pursuing. [Art 6.1(f)]



Necessary to protect your vital interests or those of another person, i.e. to prevent or manage significant risks of harm [Art 6.1(d)]

More information: Additional conditions of processing

One of these must apply if we are processing any information about your **racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or disability or your sex life or sexual orientation**. These are referred to as “special categories” of data in the data protection legislation.



Explicit consent: this means that you have explicitly agreed that we can use your personal data for this specific purpose. You are able to withdraw your consent at any time. When you are asked for consent, you will also be given details of who to contact to withdraw your consent. [Art 9.2(a)]



Necessary to protect the vital interests of you as the data subject or another person, where you are physically or legally incapable of giving consent [Art 9.2(c)]



Necessary for the purposes of substantial public interest. Where this applies, we will identify the relevant public interest. [Art 9.2(g)]



Necessary for establishment, exercise or defence of legal claims [Art 9.2(f)]



Necessary for healthcare purposes, including assessment of working capacity, medical diagnosis, provision of treatment or the management of healthcare arrangements. This only applies where the processing is the responsibility of a healthcare professional who is subject to professional obligations of confidentiality [Art 9.2(h)]

 Necessary for purposes of carrying out obligations and exercising rights in relation to employment, social security and social protection law [Art 9.2(b)]

 Necessary for research or statistical purposes, where it is considered that that the use of your data will be proportionate to the aims of the research and that your interests as a data subject will be appropriately safeguarded [Art 9.2(j)]

In addition, we can only process information about any **criminal convictions** you may have where this is in the substantial public interest and falls within a relevant description of processing set out in Schedule 1 of the Data Protection Act 2018. Further information about the basis on which we process this information is set out later in this Notice.

2. When and how we collect your data

- **Information we collect or generate about you**

The Information we collect and generate about you includes information:

- Collected from you: through your original application to BU, through online registration/enrolment, through the work you undertake on your course and through all your contacts and engagements with BU staff and service providers;
- Collected from or via UCAS: the information which you provided in your UCAS application and other information generated through the UCAS admissions cycle
- Collected from other third parties, such as institutions involved in joint programmes with BU, organisations providing funding or financing for your course at BU such as the Student Loans Company or any organisations or companies providing you with individual sponsorship or other financial support, agents representing you in the admissions process, organisations which provide work placements and (where relevant) the Home Office in relation to visas and immigration.
- Generated by BU academic and Professional Services staff or service providers in the course of delivering and administering your course and your contract with BU, or providing additional services to you in connection with your status as a BU student.

- **Data categories**

The types of data we will hold about you include:

- Contact and identification information and personal characteristics
 - your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number;

- information about your personal characteristics (gender, ethnicity, disability, sexual orientation, religion) and other demographic information (e.g. your address/postcode at the time of application) which we process for the purposes of statistical analysis for equal opportunity monitoring and regulatory reporting.
- Education history and employment information
 - Information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results.
 - Information about any employment placements or work you undertake as part of your course at BU, including your attendance and performance on the placement and any work undertaken as a student ambassador
- Academic interests, progression and performance
 - Throughout your course we will be creating and retaining records relating to your academic attendance, progression and performance. This will include your submitted assignments and examination papers, assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- Personal or family circumstances, immigration status and financial information
 - We will keep information you provide to us or third parties about your family or personal circumstances (including health conditions or disabilities), and both academic and extracurricular interests, for example where this is relevant to any consideration of exceptional circumstances in connection with your academic performance, additional learning support, pastoral care or other wellbeing support, an academic appeal, complaint or disciplinary **process or the assessment of your suitability to receive a bursary;**
 - **We will process information about your immigration status** in order to fulfil our responsibilities under immigration legislation, i.e. where you need a visa to study in the UK or you have EU/EEA settled or pre-settled status;
 - Financial information for the purposes of managing payment of fees.
- **Special category and criminal convictions data**

The data we collect and generate about you includes information subject to special protections under data protection laws: special category data (your racial or ethnic origin; religion or similar beliefs; sexual orientation; disabilities or health conditions) and information about criminal convictions.

More information: The information of this type that we hold includes special category data and information about relevant criminal convictions and offences, including:

- Information concerning your health and medical conditions (e.g. disability and dietary needs);
- Information about certain criminal convictions and about other matters on your criminal record, including information provided in Disclosure & Barring Service (DBS) checks, where this is necessary for risk assessments carried out for specified purposes; and
- Information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation, which is used for equal opportunities monitoring, external reporting and statistical purposes.

Our processing of these types of information is identified and explained in sections 4 and 5 of this Notice.

3. How we hold your data

BU uses an electronic student record system (currently a system called Strategic Information Technology Systems or SITS) to host core student records. There is an individual SITS account for each student in relation to a particular BU course which they are undertaking. The information held within SITS includes basic contact and registration information; information you provided when applying to BU; information about your course of study and your academic performance and progress; information about your fee liabilities, financing arrangements, fee payments and other aspects of your contract with BU; information about complaints, academic appeals and submission of exceptional circumstances; any student disciplinary matters; and information about any additional support needs you may have.

The same types of information which are held within SITS will also be separately held, to some extent, in electronic and/or hard copy by the Faculty or Faculties in which you are studying. Information about complaints and academic appeals may be held centrally within our Academic Services department as well as in Faculty records.

We use a number of other electronic record-keeping and communications systems for management and delivery of specific BU services. These include the Brightspace VLE, StarRez in relation to Accommodation Services, MyCareerHub and SID (this is a case management system used for managing student enquiries, complaints etc which draws core data from the SITS record).

During the 2021-22 academic year BU will be implementing and piloting the use of a new Learning Analytics system which will collect and analyse data held in existing BU systems such as SITS and Brightspace: this is further explained in section 3 of this Notice.

BU staff are required by their contracts and BU policies only to access information in these systems where this is required for the purposes of their role within BU and to fulfil our contract with you.

Your personal data will also be held in electronic and/or hard copies within files and email folders in individual BU administration departments. This includes information held by our Finance and Academic Quality departments in relation to their administration of your course and the associated financial arrangements. It will also include any information generated through your decision to access additional services provided by or through BU, such as Accommodation Services and Additional Learning Support, and other optional services such as those provided by SportBU.

4. How and why we process your data for BU purposes

This part of the Notice is divided into the following sections which deal with different aspects of data processing within BU.

- (a) **Course Delivery & Education Services**
- (b) **Student Support, Wellbeing & Risk Assessment**
- (c) **Accommodation, Campus Facilities & Additional Student Services**
- (d) **Organisational Development, Quality Improvement & Reporting**
- (e) **Communications**
- (f) **Administration, Compliance & Systems**
- (g) **After you finish your BU course**

Within each section, the main text gives an outline of the processing activity and a symbol to show the legal basis of that processing. For those that wish to have a more detailed understanding of the processing, including its legal basis, you can read the text marked “**More information**”.

Course Delivery & Education Services

- **Management & delivery of your course: core teaching, learning and research services**

The data processed for these purposes will include a wide range of information we collect from you and from third parties, and which is generated through your contact with us. This will include contact information, education history and employment information, and details of your course, your study and learning activities, your progression and your academic performance.   This includes:

- Information about your engagement with your course. This may include information about your attendance at classes (lectures, tutorials, supervisory meetings, lab sessions or other teaching sessions), your use of learning resources (including your use of the Brightspace VLE and library resources), your submission of work and your contact with BU academic staff, including your academic adviser and any research supervisor
- Information about your actual and expected academic progression and performance/attainment
- Your submitted assignments and assessment or examination papers
- Evaluations, reviews or assessments of and comments on your work, including marks and grades awarded

- Arrangements for assessments and examinations
- Details of assessments and examinations taken, your predicted and actual grades and other information in your student record; and
- Any communications between you and BU academic or administrative staff, and internal communications between BU staff which relate to you individually.

We process this information in our Faculties and in our administration teams to deliver your course/programme. We use it to deliver teaching, supervision and other academic support for your studies, to mark or assess your work and to provide you with access to all other relevant elements of our core teaching, learning and research services in accordance with the BU Student Agreement, including the facilities which form part of the core BU student experience. Our processing will include making arrangements for teaching, assignments, supervision meetings, examinations and other elements of your course content or requirements, and communicating with you about them. We use plagiarism detection software (Turnitin®) to review submitted assignments, and this involves putting your written work into a database maintained by Turnitin® in the United States. We also refer some submitted work to external examiners, i.e. academics working outside BU.

During this year we will be piloting the use of a new learning analytics system. This system is designed to gather and analyse data from existing BU systems such as SITS and Brightspace in order to provide a dashboard of information relating to an individual student which may be relevant to understanding and supporting their academic performance and progression. For use within this system we may also collect some additional information about student attendance at certain teaching sessions. You will receive more information directly if your programme is involved in the pilot activity, and during the year we will inform and consult with students generally about our future use of the system across BU.

We may deliver some teaching, supervision and assessment activities by remote or on-line methods, using facilities within BU systems or tools such as Zoom or Microsoft Teams. Where this is the case, the same types of data are processed as described above and for the same purposes. However there may be additional recording of the data being processed, for example through use of recording, monitoring or messaging functions within the systems being used. BU staff will be transparent about the way in which they use these tools. To avoid any adverse impact on staff and other students, you will need to comply with any instructions or guidance given to you about how to engage with remote delivery and specific tools being used for it.



More information: This processing is necessary to enable you to follow your programme of study in accordance with the BU Student Agreement (including relevant BU policies and procedures) and develop and progress academically, with a view to obtaining the academic standard required to achieve the qualification or credits associated with your course.

We process your data through the marking of your assignments and examinations, and in discussions and decisions about the award of marks, grades and degrees. For certain assignments and examinations your submitted work may be shared with external examiners, i.e. academics not employed by BU who provide an external perspective on the BU marking process to ensure that it is fair and maintains appropriate academic standards. (Postgraduate research subject to a Viva Voce examination will always be shared with an external examiner).

When you submit assignments for formal assessment through the Brightspace VLE, these will automatically be subject to a plagiarism detection review using Turnitin® software. This software uses textual similarity analysis to provide a plagiarism risk-rating for your work. This is shared with the BU staff member marking your work, who will consider whether any action is required. Your assignment will automatically be stored within Turnitin®'s database for reference in detecting plagiarism. Use of Turnitin® involves transfer of your personal data outside the EU, to the United States, but contractual arrangements and other protections are in place to ensure that your data receives the same protection as it would when held in the UK/EU.

We monitor your overall engagement with your course as part of the process of supervising and supporting your academic progress and supporting your wider interests and welfare. This is also relevant to compliance with immigration law requirements where relevant. We will capture information about your attendance at specific teaching sessions where this is required either for professional regulatory body requirements (courses within the Faculty of Health & Social Sciences which lead to professional registration) or to satisfy the conditions of apprenticeship programmes. Attendance information may also be captured in relation to other students: where this takes place, you should be informed by your Faculty or relevant academic staff about the data which will be captured and the reasons for this.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research

- **Evaluation and improvement of courses and student experience**

We sometimes ask for your feedback on your academic experiences. We use your feedback on our courses and your study experience at BU to comply with our policies on programme monitoring and evaluation, in order to maintain and improve the quality of our courses and teaching activities and take decisions as to the nature and content of the programmes we will provide to students in the future. Further information on this is provided below.



We also process your data, including data about your academic progress and performance, to meet the requirements of our regulator, the Office for Students (OfS). We use this data

to plan and execute activity to monitor and enhance the quality of our provision and support our Access and Participation Plan as required by OfS. More information about our reporting to OfS is provided in the Organisational Development section below.



More information:



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research



Necessary for compliance with a legal obligation on BU: we will identify the relevant obligation [Art 6.1(c)]



Necessary for the purposes of substantial public interest



Necessary for performance of BU's core public task, i.e. delivery of higher education and research

- **Academic appeals, student complaints, student disciplinary proceedings. Fitness to Practise and Support to Study proceedings.**

We will share your data as necessary to manage these situations fairly in accordance with BU's policies on appeals, complaints and disciplinary action. If you make an academic appeal or a complaint, this will usually mean disclosing information about the case to the individual(s) responsible for the matters you are complaining about. Information may be disclosed to individuals from outside BU who sit on panels who take decisions about this type of case.

We will share data externally with the Office of the Independent Adjudicator for Higher Education (OIA) if you decide to refer any matter to the OIA and with external regulators

where relevant following the conclusion of Fitness to Practise proceedings.  

This will include processing of information about any health issues or other personal circumstances which you provide to us for consideration within these processes. 

More information: If you issue an academic appeal or make a complaint under our Student Complaints policy relating to any aspect of your course, or if there is a concern that you may have committed an academic offence or behaved in a way that justifies disciplinary action by BU or affects your suitability for a course leading to a regulated profession, we will process your data as necessary to apply the relevant BU's policy and procedure and the BU Student Agreement. Our policies and procedures are intended to provide processes which are fair to all of those involved. Where relevant, we will process information about the work you have undertaken on the course and your

academic performance and progression, including information about marks awarded to your work or examination scripts. We will share your information with senior staff within BU's Students Union (SUBU) and/or with relevant NHS or other professionals from outside BU, where they are involved in determining complaints or appeals as provided for in our processes.

Following any Fitness to Practise proceedings we may need to report the outcome to external regulatory bodies (professional regulators such as the Nursing & Midwifery Council, or the Disclosure & Barring Service), if evidence collected or the outcome of the proceedings indicates that you may pose a risk to children or vulnerable adults or are otherwise not suitable to practise the relevant profession.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research, and/or the public task of external regulators

If, following completion of BU's processes, you decide that you wish to refer a matter to the Office of the Independent Adjudicator for Higher Education (OIA) for determination of whether BU has complied with its policies, we are required to provide the OIA with full copies of the material taken into account under our processes and this will include sharing your personal data.



Necessary for legitimate interests pursued by BU, i.e. compliance with the OIA process

If you provide us with information about your personal circumstances, including health or disability information, on the basis that this is relevant to any appeal, complaint or allegation, then with your agreement we will process this information as necessary to complete the relevant BU process and share it with the OIA if you refer the matter to them.



Consent: you have agreed to this processing

- **Applications for exception/special consideration**

We process information about requests from students for consideration of exceptional circumstances which may be affecting their academic performance, in particular their ability to meet deadlines for submission of assignments or other course requirements.



Where the reasons given for the request relate to health conditions or disability, we will be processing special category data. 

More information: We will only process this as necessary for determining your request and implementing any special arrangements which are agreed.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research



Consent: you have agreed to this processing

- **Virtual learning environment (Brightspace)**

BU uses the Brightspace Virtual Learning Environment (VLE) to carry out many activities in respect of the management and delivery of its courses. This includes provision of access to learning and teaching resources, provision of personal and professional development resources for postgraduate researchers, use of Brightspace's tools for communications between students and BU staff for management of courses and provision of teaching and learning support, submission of assignments (including referral of assignments to Turnitin®), capturing data relating to student attendance and engagement and transmission of marks and feedback on student work. Students will receive messages through Brightspace from BU staff regarding their study at BU.



More information: The Brightspace system is provided to BU by an external supplier and cloud-hosted. Our arrangements with the system and hosting suppliers include provisions as to data security.

Students access Brightspace through individual accounts. Students are not able to view material relating to or generated by other students, except where communications take place within a message board or other forum which is open to multiple students. Staff access material submitted through Brightspace as necessary for the purposes of their current teaching and administration responsibilities within their role at BU.

Brightspace includes functionality for capturing student attendance data which may be used where attendance is being recorded as described above. Brightspace also logs data about individual use of the system, e.g. when you log into the system and whether you have accessed certain materials hosted within it: this may be used to assess your engagement with your course and provide confirmation of your compliance with course requirements e.g. submission of assignments.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research

- **Library services**

The library operates a number of systems which process your personal data, for the purposes of managing the University's learning resources and ensuring you can access resources relevant to your study at BU. These systems will record information about the learning and research resources which you access and will also be used to send you messages relating to those resources or your study at BU.

Library enquiries, support requests and management of lost property left in the libraries are processed through the Library & Learning Support service, which can be accessed either through face to face contact with staff on campus or online. The data you give to the Library & Learning Support team will be used only to respond to your enquiry or request. We may access parts of your student record on the library services system or SITS (student record) system to enable us to respond effectively to your enquiries and requests and to return lost property to you.

From time to time the Library & Learning Support team may need to contact you about services such as the loan, renewal, return, reservation and use of library resources. In order to contact you we will access parts of your student record on the library services system or SITS system.



More information: The library systems include:

- A Library Management System, supplied and hosted by an external provider, but utilising BU's IT security arrangements. This will record information about the library resources that you borrow and will send you messages to advise you when those resources are due for return and overdue;
- A reading list system, supplied and hosted by an external provider, but utilising BU's IT security arrangements. This provides guidance on learning resources relevant to your study at BU. This will record your name and e-mail address should you choose to create a personal profile.
- A variety of online library resources, supplied and hosted by external providers, but utilising BU's IT security arrangements. Your university login enables you access learning resources relevant to your study at BU.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research

- **Apprenticeships**

If you are studying at BU as part of an apprenticeship programme, we will share information about you, your attendance and your academic progression and performance with the

Education & Skills Funding Agency (ESFA), Ofsted, your employer and any other education provider involved in delivering your apprenticeship. This is done to comply with ESFA requirements to account for apprenticeship funding and conditions set by your employer, and to enable Ofsted to fulfil its duty to inspect apprenticeship provision. You will be have been given details of this information sharing when you signed up for your apprenticeship.



More information: We will record information about your attendance at teaching and supervision sessions, so that we can provide this to your employer.

If BU is the lead provider of your apprenticeship programme, you will have entered into a commitment agreement between BU, your employer and yourself regarding the terms of your apprenticeship, and BU will provide information (about you, your attendance and your academic progression) direct to the ESFA in accordance with their requirements for providing apprenticeship funding and to your employer in line with the commitment agreement.

If BU is delivering education courses to you as part of an apprenticeship programme provided by another education provider (e.g. Bournemouth & Poole College), we will provide information to the other provider so that they can then share information about you with your employer and the ESFA.

Ofsted has responsibility for inspecting and reporting on the quality of apprenticeship provision. We process data about the attendance and progression of apprentices as required by Ofsted as part of their inspection processes.

-  Necessary for the performance of a contract between you and BU/others: this refers to your agreement to undertake the apprenticeship programme
-  Necessary for the performance of a task carried out in the public interest: ESFA's functions in respect of funding for apprenticeships and ensuring accountability for the use of such funding and Ofsted's functions in relation to inspection of apprenticeship provision.
-  Necessary for legitimate interests: employers' interests in ensuring that employees undertaking apprenticeship programmes comply with the attendance requirements and other conditions of their absence from the workplace to undertake their course.

- **Bursaries, scholarships/studentships and BU support funding**

We will process information about your personal and family circumstances, academic and extra-curricular interests and academic performance and progression where this is relevant to the assessment of your suitability to receive a bursary/studentship or scholarship or your eligibility for BU Financial Support Funding (previously known as hardship funding). Where a

bursary or scholarship is funded wholly or partly by a third party, at their request we will disclose basic information about your identity as the recipient of an award.

Depending on the terms & conditions of the scholarship, if you accept a scholarship or bursary then information about your academic engagement, performance or attainment may be shared within BU (for BU funded awards) or with any third party funding a scholarship/bursary. You will be told about such terms & conditions when the scholarship/bursary is awarded.

In relation to BU Financial Support funding we may need to process information about your financial position, e.g. bank statements, in order to determine your eligibility for funding.



Where you provide any information relating to health conditions or disability in support of an application for BU Financial Support funding or other financial support, with your agreement we will be process this for the purposes of considering your application and administering payments. 

More information:



Necessary for legitimate interests pursued by BU, i.e. enabling access by students to additional financial support.



Necessary for the purposes of a contract between us or to take steps preparatory to entering into a contract with you (e.g. a grant agreement to provide BU Financial Support funding)



Consent: you have agreed to this processing

• Work placements, student projects & exchange programmes

Where your course involves undertaking a work placement, a project which is delivered to a third party customer or a student exchange (i.e. where you undertake a period of study at a separate education provider) it will be necessary for your data to be shared between BU and the other organisation. We are likely to share your name, contact details, information about your course at BU and details of your education and employment history in order to arrange the placement, project or exchange. We will ask the third party to share information with us about your attendance and activities within the placement, project or exchange, including performance and progression information.



More information:



Necessary for the performance of the contract between you and BU

 Necessary for performance of BU's core public task, i.e. delivery of higher education and research

 Necessary for legitimate interests pursued by BU, i.e. enabling access by students to opportunities relevant to academic study and/or future career opportunities .

- **Disclosure to research funding organisations**

Certain external research funding bodies impose requirements on BU to inform them if individuals working on a project funded by them are subject to investigation or sanction for bullying or harassment. These requirements are part of the terms and conditions of funding. The exact nature of the information which has to be disclosed and the timing of disclosures varies by individual funding body. You will be given more information about these potential disclosures if you are included in the team for a relevant research project. The funding bodies which impose this type of requirement currently include the Wellcome Trust, the British Heart Foundation and Cancer Research UK. 

- **Professional regulatory bodies and their requirements**

This section applies where you are following a course within the Faculty of Health & Social Sciences which is intended, if successfully completed, to enable you to meet the requirements for registration with a professional body. This includes certain nursing, midwifery, social work and paramedic science courses.

Prior to you commencing your course, if there are matters on your criminal record which are or would be shown on an Enhanced Disclosure & Barring Service check we will carry out an assessment of your suitability to undertake the course (which includes compulsory work placements in a regulated environment). Your data may be processed for the same purposes if you become subject to our Fitness to Practise procedure during your course.

We will share your data with the relevant professional body as necessary in relation to the confirmation of qualifications, compliance with professional registration requirements (including conduct requirements) and the accreditation of courses. This may include sharing information about your conduct, performance or progression while undertaking our courses, including any required work placements, and sharing information about any case relating to you within BU's Fitness to Practise procedure. If you remain employed by a health or social care organisation while undertaking your BU course we may also share this type of your information with your employer if this is necessary for the purposes of public protection or effective professional regulation.   

More information: More information about processing of criminal records information for the purposes of risk assessment and suitability assessment is provided in the next section of this Privacy Notice.

 Necessary for the performance of the contract between you and BU

 Necessary for the performance of a task carried out in the public interest, i.e. professional regulation, maintenance of professional standards and protection of the public

 Necessary to protect the vital interests of another person

Processing of criminal records information is carried out under Article 10 GDPR, on the basis that paragraphs 6, 11 and 18 of Schedule 1 to the Data Protection Act 2018 apply [see further explanation later in this Notice].

(a) Student Support, Wellbeing & Risk Assessment

- **General**

This section provides an overview of the processing of your data for support, welfare and risk assessment purposes. The sections below provide more detailed information about processing of data for these purposes in some circumstances, e.g. in connection with particular course requirements or where you access certain support services from BU.

General enquiries or support requests and queries about lost property are processed through the AskBU service. This can be accessed either through face to face contact with staff on campus, by phone or on-line. The data you give to the AskBU team will be used only to respond to your enquiry or request. When you contact AskBU we may access parts of your student record on the SITS system to enable us to respond effectively to your enquiries and requests.

Information about enquiries you make and your use of student services (e.g. to obtain advice on finance or immigration issues or to make a complaint) may be stored in our SID system. Staff within the relevant student support service and Faculty programme support staff may be able to see that you have asked for support or made an enquiry. This enables staff to make appropriate referrals of further enquiries and may assist in providing advice on specific subjects. However only staff who provide a particular service will see the details of a support request/enquiry, and sensitive enquiries (e.g. about health and wellbeing) will not be visible to staff outside the relevant specialist team.

During your time at BU, staff will process information about your personal and family circumstances, academic and extra-curricular interests and academic performance and progression where this is necessary to provide you with appropriate pastoral care and support in the context of your studies at BU. We also process this type of information where we have concerns about your ability to continue with your studies at BU for health reasons or to safeguard you or others from potential harm. We also process this type of information in the context of our Global Talent Programme: further information about this will be provided if you become involved in this Programme.



The data we process for these purposes will include information you have given us about any health conditions or disabilities affecting your life and study at BU, and any other special category data you have provided to us which is relevant. This may also include processing any information given to us by third parties, e.g. expressions of concern about your wellbeing or information about any risks of

harm to yourself or others. 

Prior to on-line registration we asked you to complete a questionnaire to tell us about any disabilities, health conditions, learning support needs or other support needs which might be relevant to your life at BU. We ask for this information so that we can assess the range of support you may need and put appropriate adjustments in place where possible. Further information about how we use this information was provided with the questionnaire and is also set out below and in our policy (3D: Admissions Policy and Procedure for Applicants with a Disability, Medical Condition or Other Support Need). You do not have to give us this information, but we are only able to make adjustments for you and put support in place if you provide us with full and accurate information.

We have asked you to tell us during on-line registration if you have a health condition which means you are within the government's definition of "extremely clinically vulnerable or "clinically vulnerable" in the context of the Covid-19 pandemic. You do not have to give us this information, but if you do provide it we will contact you only if circumstances (relating to the public health situation) indicate that you may need support. We will then contact you to discuss potential support arrangements with you. We will only use the information for these purposes during the academic year 2021-22. 

Where your application to BU indicates that you are a care leaver, we will contact you before the start of the academic year to invite you to a care-leaver specific event designed to give you additional support in preparing to start your studies at BU, and to put you in touch with our Student Support staff who provide support specifically for care leavers. We will also send you information about Care Leaver Bursaries, and share information with our Accommodation Services team to ensure you are given the appropriate priority in allocation of accommodation, in accordance with the Care Leavers accommodation guarantee.  

Where you tell us during the admissions process and/or during online registration that you are estranged from your family, we will contact you before the start of the academic year to provide information about support available to you. We will send you further emails about available support during the academic year, unless you ask us to stop these communications.  

We will process information about any matters on your criminal record which you notify to us in accordance with our processes, when you accept an offer to study at BU or subsequently. We use this information to carry out risk assessments which consider whether your record will affect your suitability for your course, any potential risks to others which would arise from your study at BU, and whether or how any such difficulties or risks may be appropriately and effectively managed.



More information:



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research

 Necessary for the purposes of substantial public interest [Safeguarding students under 18 and vulnerable students over 18]

 Consent: you have agreed to this processing

 Necessary to protect your vital interests or those of another person

 Necessary for legitimate interests pursued by BU, i.e. support of care leavers

- **Additional Learning Support**

If you have a condition, disability or support need which may mean that you require additional support with learning or other adjustments by BU, we ask you to register with BU's Additional Learning Support service. Additional Learning Support works with you to assess the range of support you may need and put appropriate adjustments in place where possible. This includes supporting other student services by helping to assess the impact of conditions and disabilities on other aspects of your experience at BU e.g. accommodation. The service also manages the delivery of learning support. With your agreement we will process your personal data, including information about relevant health conditions or disabilities, for the purposes of providing this service. We will collect this data from you and from third parties such as professionals who assess your support requirements.

Additional Learning Support will need to share some of your disability-related information with BU staff and external examiners, so that appropriate support and adjustments can be provided to you in relation to teaching, learning and assessment, and provision of accommodation. We may also need to share information with external auditors of Disabled Students Allowance funding. With your permission we may share your information with other third parties, for the purposes of assessing and meeting support requirements. 

More information: We use the information you provide to assess your needs, determine the support which can be provided to you, determine eligibility for public funding for the cost of that support, provide the support to you and process any payment required for the support. We do this only with your agreement and on the basis that it is necessary to enable us to provide the Additional Learning Support service.

We use information about you provided by you at application stage as described in our Student Recruitment & Admissions Privacy Notice. We collect more detailed information from you through the questionnaire we ask you to complete before enrolment (see above), and later through registration with the Additional Learning Support service and further discussions with you. We will also collect information about you from third parties, e.g. where they are asked to provide relevant assessments: you will be involved in these processes.

Detailed information about your conditions or disabilities will only be accessible to staff within ALS. However to provide ALS services we will need to share some information

with BU staff and external examiners who carry out teaching, learning support, administration or assessment activities on your course. We will discuss with you whether/to what extent we will share information about your disability, the impact of your disability on you and your studies and the adjustments which need to be made for you. With your permission we may share your information with third parties, such as educational psychologists, funding bodies or equipment providers. If you receive Disabled Students' Allowance, some of your ALS information may also need to be shared with external auditors.

For students applying for or living in BU-allocated accommodation, information about your support requirements may also need to be shared between ALS, BU's Residential Services team and external accommodation providers for the purposes of providing you with access to suitable accommodation and support. ALS may also process information about any disabilities you have, to assess your eligibility for BU parking permits on behalf of our Estates department.

 Consent: you have agreed to this processing

 Necessary for the performance of a task carried out in the public interest:
auditing of public funding [this relates only to sharing with DSA-QAG
information about students receiving Disability Support Allowance]

 Necessary for the purposes of substantial public interest

- **Occupational Health**

Where your course requires you to undertake work placements within healthcare settings, before the start of the course you must undergo an occupational health assessment to ensure you meet vaccination requirements, and to identify any risks or issues which may affect your ability to complete the placement and any needs you have for specific support in your placement, e.g. due to health conditions or disability. We may also need to carry out additional risk assessments in relation to specific conditions or infections (such as Covid-19). This applies to professional healthcare programmes of study within our Faculty of Health and Social Sciences. Your personal data will be shared as necessary with the University's supplier of student occupational health services (currently Dorset Healthcare University NHS Foundation Trust). This will take place once you have accepted an offer to study at BU. Outcomes from this assessment process may be shared with BU if they are relevant to your suitability to take up your offer of study at BU. Further information will be given to you when we make the referral to the service.



More information: Within the occupational health services provider, data relating to your health conditions or disabilities is processed only by healthcare professionals who are subject to professional obligations of confidentiality.

-  Necessary for performance of BU's core public task, i.e. delivery of higher education and research
-  Necessary for healthcare purposes, including assessment of working capacity, medical diagnosis, provision of treatment or the management of healthcare arrangements.
-  Necessary to protect your vital interests or those of another person, i.e. to prevent or manage significant risks of harm
-  Necessary for the purposes of substantial public interest: safeguarding vulnerable people

- **Support to Study process**

We will process your data as necessary for the purposes of BU's Health, Wellbeing and Support to Study Policy and Procedure. This applies where we BU staff have significant concerns about your behaviours, attitude or ability to undertake your course or elements of your course, and where we believe that this is related to underlying health conditions or disability or that otherwise it would not be appropriate to use the Student Disciplinary Procedure in response to these concerns. This may include processing special category data about health conditions and disabilities which you provide to us for the purposes of this process or which you have previously provided to us for other purposes. Information processed within this BU process may subsequently be shared with the Office of the Independent Adjudicator (OIA) if you refer your case to the OIA for a review.

More information:

-  Necessary for the performance of the contract between you and BU, i.e. the Student Agreement
-  Necessary for performance of BU's core public task, i.e. delivery of higher education and research and safeguarding students
-  Necessary for legitimate interests pursued by BU, i.e. compliance with the OIA process
-  Consent: you have agreed to this processing
-  Necessary for the purposes of substantial public interest: safeguarding vulnerable people

- **Medical Conditions and Health & Safety**

We ask you to tell us about any disabilities or health conditions which may have implications for your or others' health & safety while you are at BU. This would include any disability or

condition which may result in a medical emergency or which would affect your ability to undertake particular activities safely, even if you do not generally need support or adjustments for your life at BU. We will not know this information or be able to help you manage risks unless you tell us. We give you an opportunity to provide this information in the questionnaire we ask you to complete before enrolment. If your course involves activities for which a health and safety risk assessment is required (such as field trips, laboratory work or workshop activities involving use of machinery), we need to ask you specific questions about health conditions, disabilities and support needs in order to identify and manage any particular risks to you and others within these environments.

If you provide this type of information, with your agreement we will work with you to assess your disability/condition and its potential impact, and agree any health & safety action plan needed to manage risks to you and others or any other wellbeing or support plan you wish to put in place.

More information:

If your course involves activities such as field work, laboratory work or use of workshop machinery, we need to know about relevant conditions or support needs so that we can manage health and safety risks to you and others. If you are not on a course of this type you do not have to provide us with this information. However this will usually affect our ability to provide you with support in managing the impact of your condition/disability.



Explicit consent: we only process this information with your specific agreement



Necessary to protect your vital interests or those of another person, i.e. to prevent or manage significant risks of harm

- **Health and Welfare information**

Throughout your time at BU you may share with BU staff information about your health or welfare, or matters affecting your health or welfare. This might include your academic adviser or supervisor, other Faculty staff, a BU student welfare advisor or other staff involved in providing student services. Where this happens, the staff member will usually let you know on a case by case basis what they will do with the information, including whether they think need to share any of it within BU or with third parties. They will normally give you the opportunity to agree or object. For example, if you share information with your academic adviser they may ask if you are happy for them to contact staff within the Student Wellbeing team in BU Student Services.

If we refer you to an external health or wellbeing service (whether this is a service commissioned by BU, such as the Student Wellbeing service, or an NHS service), we will

usually agree this with you. After the referral is made, the external service will collect further information directly from you and will be responsible for how that information is processed and held.

Occasionally we may decide that we need to process certain information about you without relying on your consent: for example because the processing is necessary to protect your or another person's vital interest, to safeguard the welfare of you or someone else or to comply with our legal obligations.

Sometimes a third party will share information about your health or welfare with us because they are worried about you. When this happens, we will consider what action, if any, we will take in response to the information. We will decide whether we need to tell you about the information and our response or whether the situation means that this would not be necessary or appropriate.

More information:



Consent: you have agreed to this processing



Necessary to protect your vital interests or those of another person, i.e. to prevent or manage significant risks of harm



Necessary for the purposes of substantial public interest: safeguarding vulnerable people

- **Student Wellbeing Service**

This service provides counselling and other support in respect of wellbeing issues and mental health or distress. If you wish to access this support, with your agreement BU student support staff will process your data in order to refer you to the service, which is provided by Dorset Healthcare University NHS Foundation Trust (an NHS organisation separate to BU) under a contract with BU. If you access the wellbeing service you will be given further privacy information about the use of your data.

More information: A wellbeing service for BU students is provided by Dorset Healthcare University NHS Foundation Trust (an NHS organisation separate to BU). This service is provided under a contract between BU and the Trust. If you wish to access this service, the BU student support team will use your data to refer you to this service. Following referral, with your agreement your data (including information about any relevant health conditions or disabilities) will be shared with and processed by the wellbeing service. You will be given further information about this processing, and asked to sign a form consenting to the use of your information, when you are referred to the service.

Within the wellbeing service your information will be processed only by healthcare professionals who are subject to professional obligations of confidentiality.



Consent: you have agreed to this processing

- **Criminal records information and Disclosure & Barring Service checks**

BU requires offer-holders and students to disclose information about criminal records matters as follows:

- If you are accepting an offer from BU on certain health & social care courses which include mandatory work placements in the regulated professional environment: we require you to declare and provide details of any matters on your record which would be disclosed through an Enhanced Disclosure & Barring Service check. We also ask you to complete an Enhanced DBS check, either immediately after you have declared matters on your record or, if you did not declare anything, before enrolment. We use this information to assess your suitability for your chosen course/profession and your ability to meet the course requirements to complete work placements in the regulated professional environment. For further information see our [policy and guidance](#) on criminal records declarations for regulated professions courses. 
- Everyone accepting an offer to study at BU is asked to declare certain relevant unspent criminal convictions (as defined in our [Admissions Policy and Procedure for Applicants with a Criminal Record \(3E\)](#)). We ask you to give us this information so that we can assess and manage any risks arising from the conviction in the context of the University environment.

The requirement to declare these matters to BU is on-going. This means that you are also required to disclose any matters within these descriptions (where applicable) which are imposed on you at a later date, after the point at which the declaration was first required - whether before or after enrolment at BU. 

If you wish to undertake a voluntary work placement (i.e. a work placement option which is not a mandatory course requirement) which involves regulated activity with children or vulnerable adults, you will need to go through an Enhanced DBS check before the placement is confirmed. 

We will disclose to the Disclosure & Barring Service information about any conviction or caution you receive which is relevant to the DBS function of protecting children and vulnerable adults. 

More information:

We ask about spent convictions and other criminal matters in relation to regulated professions courses because the purposes for which we use this information make our question exempt from the Rehabilitation of Offenders Act 1974.

Information about your criminal record is only processed or shared within BU as necessary to carry out the risk assessment processes as described in our Admissions

Policy and Procedure for Applicants with a Criminal Record (3E)) and to complete any risk control actions identified in risk assessments. Where that assessment is carried out by a BU Panel (Disclosure Panel or Criminal Conviction Panel), information is given to Panels in anonymised (no-names) form.

Where risk assessment results in a decision that we need to pass some information about your record and our risk assessment in identifiable form to individuals within BU or at third party organisations (e.g. accommodation provider), we will tell you before this happens.

Otherwise information about criminal records which is collected before you start your course at BU will not be further processed or shared within BU unless this is necessary to manage any issue which arises in connection with the accuracy of previous declarations made to BU or in connection with any later concerns/additional criminal matters arising.

If you have made the required declaration when accepting an offer but you subsequently receive a relevant criminal conviction or other matter (i.e. a matter that you would have been required to declare at the earlier stage), you need to notify BU. In addition, during enrolment at the start of each academic year you will be asked to confirm whether there are any changes you need to make to your previous declaration(s) regarding relevant criminal convictions or other matters. Any information provided in these declarations will be processed in the same way and for the same purposes as the original declarations required, and we will disclose it to the Disclosure & Barring Service if it is relevant to its statutory functions of protection children and vulnerable adults.

Further information about BU's processing of students' criminal records information is set out in our policy 3E: Admissions Policy and Procedure for Applicants with a Criminal Record (available in the Important Information section on the BU website).



Necessary for the performance of a task carried out in the public interest: this refers to the University's role in supporting the regulation of health and social care professions by assessing the suitability of applicants to courses leading to those professions, its task of providing education in accordance with its own regulatory requirements and the wider duty of the University, professional regulators and the Disclosure & Barring Service to safeguard people within the University environment and people in the health and social care work placement environment.

We can only process this type of information where it falls into one or more of the paragraphs in Schedule 1 to the UK Data Protection Act 2018. The relevant paragraphs are:

- Regulated professions courses:

- Paragraph 6: necessary for the exercise of a function conferred by law: this refers to the University’s need to comply with regulatory requirements set by the Office for Students, in particular regulatory conditions B1 and B2
 - Paragraph 18: necessary for the purposes of safeguarding, i.e. protecting individuals from risks of neglect, harm or damage to well-being
 - Paragraph 11: necessary for the exercise of a function intended to protect members of the public against seriously improper conduct, unfitness etc.
 - Other courses:
 - Paragraph 10: necessary for the purposes of prevention or detection of unlawful acts
 - Paragraph 18: safeguarding, as above
- **Finance advice & support**

BU Student Services provide advice to students on sources of financial support and assistance with applications for financial support, e.g. to Student Finance England/the Student Loans Company or to the BU Financial Support fund. We will make and retain notes of the advice we’ve given to you within our SID system. If you apply to the BU Financial Support Fund, you will usually do this using the MyCareerHub system. We will keep your completed application forms, our calculations of eligibility for financial support and a record of the award for seven years, but documentation you provide in support of your application will be kept only until the end of the academic year in which you make the applications.

 Necessary for the performance of a contract between you and BU

 Necessary for the performance of a task carried out in the public interest: providing support to students to enable them to access higher education

 Necessary for legitimate interests pursued by BU: providing support to students to enable them to access higher education

 Consent: you have explicitly agreed that we can use your personal data for this purpose – this applies to any special category data shared with us

- **Immigration advice & support**

BU Student Services provide support and assistance to future students (those who have received an offer from BU) and students with regard to their immigration status and visa applications. This is provided through webinars, email and one to one appointments. This service is regulated by the Office of the Immigration Services Commissioner (OISC), which may access information for the purposes of auditing compliance with their standards and requirements. We retain records of advice given to individuals for six years, in accordance with OISC requirements. Information you give us when using this service may be disclosed as described in the Immigration Compliance section of this Notice.



Necessary for the performance of a contract between you and BU



Necessary for the performance of a task carried out in the public interest: providing support to students to enable them to access higher education



Necessary for legitimate interests pursued by BU: providing support to students to enable them to access higher education



Consent: you have explicitly agreed that we can use your personal data for this purpose – this applies to any special category data shared with us

(b) Accommodation, Campus Facilities and Additional Student Services

- **Accommodation**

Your data will be processed by the BU Residential Services team where you choose to apply for certain categories of student accommodation or use other accommodation services provided by BU.

- BU accommodation (student halls)

Certain places in certain student residences are provided either by BU or by third party providers under contract with BU, and students access booking facilities for this accommodation through the BU Accommodation Portal. This accommodation is referred to as “BU accommodation”. BU directly allocates some BU accommodation to those with specific needs such as relevant health conditions or disabilities, otherwise students select their accommodation on the Portal and are then referred to the relevant accommodation provider to complete their booking.

Your name, contact details and banking details will be processed for the purposes of managing your booking and then managing your contract for accommodation. This will include your data being passed to any third party accommodation provider which operates the accommodation you are booking so that you can conclude the booking process with them. After that, the provider will give you privacy

information about how they process your information for the purposes of managing the accommodation and their contract with you.



If you are going to be under the age of 18 when you start your course, you will be given further specific privacy information about processing of your personal data and that of your parents/guardians in connection with your information.

Students resident in BU accommodation will automatically be sent information about ResLifeBU events and activities by email and text, as access to these services is part of the overall accommodation service covered by your rent payments. 



Necessary for the performance of the contract between you and the accommodation provider, or for preparatory steps in relation to that contract.



Necessary for legitimate interests pursued by BU, i.e. enabling access by students to all services and facilities available to them as a higher education student and ensuring a safe environment

If you declare a relevant criminal conviction when you accept an offer to study at BU, the risk assessment we carry out in relation to your conviction(s) will include consideration of any risks to yourself and/or others if you live in BU accommodation. Depending on the outcome of that risk assessment, we may share information about your convictions and our risk assessment with relevant third party accommodation providers. We will tell you before sharing information in this way.



Necessary for the performance of a task carried out in the public interest: this refers to the University's duty to safeguard people within the University environment.

We can only process this type of information where it falls into one or more of the paragraphs in Schedule 1 to the UK Data Protection Act 2018. The relevant paragraphs are:

- Paragraph 18: necessary for the purposes of safeguarding, i.e. protecting individuals from risks of neglect, harm or damage to well-being;
- Paragraph 10: necessary for the purposes of prevention or detection of unlawful acts

If you provide us with information about any health conditions, disabilities or support needs relevant to your booking of accommodation, we will process this within BU and share it with accommodation providers as necessary to identify your accommodation needs and help you secure a booking of appropriate accommodation.

If you tell us that you have a disability or medical condition that affects the type of accommodation you need, or that you have a partner, family or dependents who need to live with you, we will need to pause the registration and booking process while we collect further information needed to consider your accommodation needs. Information provided in this section or in response to our further enquiries may be shared with those who manage your accommodation, including BU's third party accommodation partners. By providing the information you consent to its use by BU and its accommodation partners where this is necessary to identify appropriate accommodation for you, process your accommodation booking and support you in BU accommodation. You can withdraw your consent at any time, but this will affect our ability to provide you with accommodation and support.



Consent: you have agreed to this processing.

While you are living in BU accommodation, if there are concerns about your welfare then BU's Residential Services team and your accommodation provider will share information between them, and will provide information to other people within BU or to third parties (e.g. NHS organisations or the police) where they consider this necessary to safeguard your welfare.



Necessary to protect your vital interests



Necessary for a task in the public interest (BU's duty as a university to safeguard its students)



Necessary for the purposes of substantial public interest: safeguarding vulnerable people or providing confidential counselling or similar services

Each year we invite everyone living in BU Accommodation to complete the National Student Housing Survey. You do not have to complete it. Data collected through the survey is shared with third parties in an anonymous statistical format.



Necessary for legitimate interests pursued by BU and a third party, i.e. monitoring and reporting on the quality and suitability of student housing.

- o LettingsBU service

LettingsBU is an accommodation finding and letting service operated by BU. It provides similar services to those of commercial letting agencies. If you use the services of LettingsBU then you will be given separate privacy information about the processing of your data for these purposes.

- **Campus Facilities**

We process your information in a number of ways in order to manage the BU estate (land and buildings) on both the Talbot and Landsdowne Campuses, so that we can provide a safe, secure, efficient and well-managed environment. This includes:

- Use of an electronic access control system to manage entry and exit to buildings. Access controls are applied to doors within BU buildings and access to some of our buildings is controlled through use of barriers. These controls are applied for safety and security reasons. The access control system enables access by a student with appropriate permissions through use of their student ID card. Where you obtain access in this way, the access control system will record your name and ID card number together with the details of your entry and exit times to the relevant buildings. This data is held in our systems for three months before being automatically deleted. While held this data is accessible only to limited BU with responsibilities for managing or supporting the access control system. The data is extracted and used /shared only for the purposes of identifying or resolving system or access issues (e.g. issues with access permissions), or where required for the purposes of a disciplinary process or by the police for a criminal investigation.
- Operation of CCTV systems. Data generated through the operation of these systems will be used internally by BU for investigating and responding to incidents. This data may in certain circumstances be shared with the police or other third parties.

CCTV systems are in place in some parts of BU's estate for the purposes of ensuring a safe and secure environment, preventing crime and anti-social behaviour and facilitating the detection or prosecution of criminal behaviour. CCTV footage is processed in accordance with BU's CCTV policy and procedures. Images are captured 24 hours a day, seven days a week. The CCTV systems digitally record seven frames per second. These images are automatically erased after a period of no more than 31 days after they are recorded, unless before that time we are made aware that the images are required for evidence (in which case they are securely stored until the incident is resolved or the information is passed to an official third party). Access to the footage is securely controlled by BU's IT security arrangements. Footage may be viewed and used internally by BU staff for the purposes of investigating and responding to incidents on BU premises: this may include use within staff or student complaint/grievance or disciplinary processes, and use in relation to managing BU's legal liability and making or managing insurance claims.

We may provide CCTV footage to the police where they believe that a crime has been or may have been committed and we are satisfied that the CCTV footage may assist them in their investigation and disclosure would comply with the data protection legislation.

We may provide CCTV footage to other third parties, but only if we are satisfied that there is a clear legal basis for doing so and that it will be fair to the individuals who are the focus of the request, including consideration of whether to notify those individuals before access to the footage is provided if their identities are known and this is feasible.

- Management of car parks and provision of parking permits. This includes sharing data with the third party provider of parking enforcement services (UK Car Park Management (UKCPM)).

When you apply for a parking permit your data is processed within BU to assess your eligibility for a permit. The data held within the BU parking permit system is accessible only to staff in the Estates team with responsibility for managing the permit system. This data is deleted from our system within three months after you leave BU.

A third party provider (currently UKCPM) carries out monitoring and enforcement of the terms and conditions of use of BU car parks. UKCPM uses Automatic Number Plate Recognition (ANPR) technology for this purpose. Separate privacy information about this processing is provided on the signs in BU car parks and when you make any application for a BU parking permit.

- Timetabling of classes. We use student personal data to produce individualised student timetable information. This involves processing student names, ID numbers, contact details and module choices.
- If you make a room booking at BU we will use your BU email contact details to send a confirmation email to you and to contact you if any issues arise in relation to your booking.
- We use your contact details to let you know of any issues affecting access to or safety on the campus



Necessary for the performance of a task carried out in the public interest, i.e. operation of BU as a university in a safe, secure and efficient environment or prevention and detection of crime.



Necessary for the performance of a contract between you and BU



Necessary for legitimate interests pursued by BU, i.e. management of premises

- **Additional Student Services (Sport, Culture, Careers)**

BU provides a number of other services for students to support them in achieving a wide and fulfilling experience of student life and in making the best use of their BU education after they leave BU. Some information about the scope of these services and their availability to BU students will be provided within general student communications as described below. Other information about the services will be made available only if you engage with a specific service

and choose to receive information about it. At this stage you will also be given more information about how your data will be processed in connection with that service.

- Culture

We issue regular mailings to those interested in music and art activities and events. Separate privacy information will be provided in those communications.

With your agreement, we will share your data (including your contact details and information about your musical interests) with music tutors to facilitate the arrangement of music tuition. 

- SportBU

Separate privacy information will be provided when you access SportBU services and facilities. Communications may be sent to you about the existence or scope of SportBU services as described in the Communications section below.  

- BU Careers & Employability Service

Information you provide will be processed for the purposes of responding to any specific enquiries you make, providing any specific services or support requested and carrying out internal analysis of the use of the Careers & Employability Service. Much of the information and support available from this Service can be accessed through the online MyCareerHub system: to use this system you will be asked to set up an individual account using your BU login and password information. Further privacy information about the processing of your information through MyCareerHub will be provided at this point.  

 Consent: this means that you have agreed that we can use your data for this specific purpose.

 Necessary for legitimate interests pursued by BU: providing support and additional services to students as part of the higher education experience

(c) Organisational Development, Quality Improvement & Regulatory Compliance

- **Evaluating courses, outcomes and student experience**

We sometimes ask for your feedback on matters relating to your student experience at BU, including both academic experiences and other matters such as the impact of receiving student bursaries or your wider experience of student life at BU. These may be sent to you while you are still at BU or after you leave BU. You are not required to participate in these

surveys. We use your feedback on our courses and your study experience at BU to comply with our policies on programme monitoring and evaluation in order to maintain and improve the quality of our courses and teaching activities and take decisions as to the nature and content of the programmes we will provide to students in the future. Where relevant, your feedback is also used for other organisational development purposes e.g. to consider future approaches to providing financial and other support for students and determine how to communicate with applicants/potential applicants and students in the future.

To obtain student feedback we may ask you to complete BU forms or surveys, provide oral or written comments to student representatives or act as a student representative for your course. We may use online survey tools such as Survey Monkey for this purpose. You may also be invited to complete surveys delivered by external organisations, such as the National Student Survey (NSS), the Graduate Outcomes Survey (GOS), the Postgraduate Taught Experience Survey (PTES) and the Postgraduate Research Experience Survey (PRES).



More information: In connection with our core teaching, learning and support services we use student views and evaluations to help us maintain, develop and improve the quality of our courses, our teaching and supervision activities and related policies. In some cases BU has a regulatory requirement to carry out surveys or evaluations itself or support the conduct of surveys by third parties. In particular:

- We will ask you to provide internal feedback on or evaluations of your study experience at BU, including specific courses or modules you are undertaking. When submitted in writing as a response to a survey (e.g. MUSE questionnaires) this information will be provided on an unnamed basis unless you choose to provide your name. All personal data will be anonymised in internal and external reporting of results. We may ask you to provide this information using an online survey tool such as Survey Monkey: if this is the case, the survey tool provider will also provide you with a privacy notice about their processing of data. If you provide feedback orally or informally, e.g. to a student representative or by email to an individual academic, you need to tell the recipient if you do not want your name to be linked to your feedback or you do not want your feedback to be used or shared in a particular way.
- We sometimes invite students to take part in focus group discussions about BU policies relating to teaching and learning or student experience. We keep a record of the names of students who participate in these groups but when we record the views expressed in the group we do not link these to student names or any other identifying information.
- External evaluation surveys used by BU for the same purposes include the National Student Survey (NSS) of undergraduate student experience and the Graduate Outcomes Survey (GOS) (both carried out on behalf of HESA/the Office for Students) and the PTES and PRES surveys of postgraduate student experience,

carried out by AdvanceHE on behalf of higher education providers. We use the results of these surveys in anonymised form. Separate privacy notices will be given to you by those carrying out the surveys if you agree to participate. For PTES and PRES, the survey is developed by AdvanceHE for use across the HE sector and administered by BU in relation to its students. To run the survey we use an individual identifier linked to student name, but the identifiable information is deleted after the results are received and we do not connect the survey responses to individuals. There is a separate section below about the national surveys we are required to take part in, the National Student Survey (NSS) and the Graduate Outcomes Survey (GOS).

- We use your evaluations to provide overall feedback to the BU staff who manage and deliver a course, with a view to securing appropriate improvements to the course and its delivery.
- If your feedback has not been provided anonymously, we will sometimes ask to discuss feedback with you for the purposes of improving the relevant course or course delivery or giving you information on responses to feedback.
- Your evaluations and feedback will not affect any other decisions or actions relating to you specifically (as an identifiable individual). The only exception is if your views or the way in which you have expressed them breach a BU policy such as the Dignity & Respect policy.
- In addition to surveys or evaluations of your course of study, we will sometimes invite you to complete surveys carried out by BU or external organisations which relate to other aspects of your BU experience/student life. These include the National Student Housing Survey (carried out by an external organisation), LettingsBU surveys on accommodation and the Arrivals survey carried out by BU Student Services. The results of these surveys are used by BU only for the purposes of evaluating and improving the scope and content of services and support we provide to our students. External organisations will provide further privacy information about their use of survey results.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research



Necessary for legitimate interests pursued by BU, as described above.

- **Statistical analysis and reporting**

For analysis and reporting purposes we process information about your personal characteristics and background. This data is collected during the application process and during on-line registration at the start of the year, and you can update it throughout the

academic year. It includes information about your ethnicity, health/disability, your gender status, sexual orientation and your religion or equivalent beliefs. It also includes information about your qualifications on entry to BU and about your socio-economic background, such as the socio-economic profile of your home address, whether you are a care-leaver, whether you are estranged from your family and whether you are the first person in your family to attend higher education. For analysis and reporting purposes we often link this data together and to the further information about your academic performance and progression which is generated through your study at BU and contained in your student record, and student feedback collected as described above.

The processing described in this section is carried out for the purposes of data analysis and reporting, which informs work to develop our provision of education, support and other services to students: it does not focus on you as an individual or involve taking decisions or actions relating to you specifically as an identifiable individual. The outputs from this activity are reports which refer to anonymised, statistical data from which you cannot be identified. This analysis is used:

- Internally to help us improve the quality and effectiveness of our education provision, student support arrangements and wider services for students, so we can increase our ability to meet the expectations and needs of students/potential students and future employers;
- Internally to help our Access and Participation work at BU as required by the regulatory requirements of the Office for Students (OfS) and promote equality of opportunity in accordance with the Equality Act 2010. This may include using the analysis to identify categories of students who may benefit from particular support or adjustments to current practice, plan provision of such support or adjustments and evaluate the success of such measures;
- In external reporting to the OfS (on our performance as a higher education provider and our compliance with regulatory conditions, including our Access and Participation Plan) and to the UK government and other government/public sector bodies.



More information: The statistical analysis we create is carried out primarily by data analysts in our Academic Services and PRIME teams and is presented in a format which does not identify you as individuals.

Internally, reports on this statistical analysis are shared in a range of ways. This includes reporting within our governance structure, to our Board, Senate, Committees and sub-Committees. It also includes use within our Academic Quality team, Faculties and professional service teams to drive improvements within BU.

Externally, BU is required to make a range of reports to OfS. These include reporting on BU's actions for the purposes of widening participation as well as reports which enable

OfS to appraise the quality and effectiveness of BU's teaching and research activities. BU may also be asked to provide similar reports to the UK Government (Department for Education) and other public or government bodies or agencies.

-  Necessary for performance of BU's core public task, i.e. delivery of higher education and research
-  Necessary for the purposes of substantial public interest: this is equal opportunities monitoring
-  Necessary for research or statistical purposes

- **Providing data to HESA**

As a higher education provider BU is legally required to include your personal data in an annual data report to HESA, the Higher Education Statistics Agency. Our reporting to HESA includes your name, the course you are following at BU and your funding arrangements, as well as detailed information about your personal characteristics including home postcode, ethnicity and any information we hold about your health conditions or disabilities, sexual orientation, religion or equivalent beliefs and care leaver status. For further information about the data provided to HESA and the way in which it is processed by HESA and other third parties, please see the HESA Collection (privacy) notice for students:

<https://www.hesa.ac.uk/about/regulation/data-protection/notices> .

We provide some of this information under the legal framework in the Higher Education and Research Act 2017 or for a task in the public interest, or for legitimate interests, and always for research and statistical purposes. We do not ask for your consent to provide this information to HESA. This processing is not on the basis of consent, once you have given us the information. If you have questions or concerns about HESA's use of your information which are not answered by the HESA privacy notice, you should contact HESA directly using the contact details provided in its privacy notice.    

More information:

-  Necessary for compliance with a legal obligation
-  Necessary for the performance of a task carried out in the public interest
-  Necessary for legitimate interests
-  Necessary for research or statistical purposes,

- **Arrangements for national surveys**

BU is required to facilitate the conduct of two national surveys used to appraise the quality and effectiveness of higher education experiences in the UK and facilitate higher education policy-making. For this reason we will provide your name, course details and contact information to:

- the organisation which acts on behalf of the Office for Students to carry out the National Student Survey (NSS).

This is an annual survey of higher education students' views about their course and higher education provider which is used to create published feedback about and ratings of courses and providers, and generally to drive improvements in higher education provision;

and

- the organisation which acts on behalf of HESA to carry out the Graduate Outcomes Survey (GOS).

This is a survey about the job/career outcomes for higher education graduates. You may be contacted about participating in this survey about fifteen months after you leave BU.

If you are contacted for these purposes you will be given further privacy information at that point and can choose whether you wish to participate. BU receives your responses to the NSS only in anonymised statistical form. Responses to the GOS are received in individualised format but your data is only used for the research and statistical purposes (evaluation etc) described above and is not used to take any action or decisions in relation to you as an individual. Any information we publish about GOS responses will be in anonymised statistical form.

More information:



Necessary for the performance of a task carried out in the public interest: the OfS's statutory duties to ensure the quality of higher education.

(d) Day to day communications

- **Communications**

We process your contact data to facilitate and manage your registration as a student at BU, and to administer your course of study. We create an individual student ID number and a BU email address for each student. Your name, ID number and BU

email address are listed in our internal contacts directory which is accessible to all BU staff and students using BU's email system.

BU academic and faculty staff will use your contact information to communicate with you about your academic work and associated administrative arrangements such as arrangements for examinations and submission of assignments. This type of communication may also be sent to you through Brightspace. BU Professional Services staff will use your BU email address to communicate with you about non-academic matters including support services and management of complaints or disciplinary processes. If you have signed up for a specific service provided by BU, such as accommodation or Sport BU services, the relevant teams within BU will send you communications as necessary for the provision and administration of the service and in accordance with any permissions you have given e.g. to receive information about offers or events.

Towards the end of each academic year we send all BU students an email informing them of the options for securing accommodation for the next academic year through BU Residential Services. If you do not wish to receive this email please contact us through lettingsbu@bournemouth.ac.uk .

We use your BU email address to send you frequent communications about matters relevant to your studies, your accommodation (if you are resident in BU accommodation) and about other aspects of the standard BU student experience (such as matters affecting the BU environment on campus and information about BU facilities and events). We may use email to invite you to complete surveys being carried out by BU or external organisations, as described elsewhere in this Notice.

If you have provided us with an alternative email address and/or a mobile phone number, we may use these methods of communication as well as your BU email address.



More information: This processing ensures that you are able to access all elements of your course or research programme in accordance with our commitments under the BU Student Agreement. These include feedback from BU staff and facilities required for your course. It also helps to ensure your safe and appropriate use of BU facilities, and to facilitate your access to the wider student experience at BU which forms part of the core BU offer to its students. It enables you to make informed choices about accessing specific services or experiences available to you as a BU student.

If you are resident in accommodation booked through BU Accommodation Services, you will receive information about ResLifeBU events and activities, as access to these services is covered by your rent payments.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research in an appropriate environment



Necessary for legitimate interests pursued by BU, i.e. enabling access by students to all services and facilities available to them as a higher education student and ensuring a safe environment

(e) Administration, Compliance & Systems

- **Finance and payments**

If you make payment to us by card through our online payment gateway, this system uses up-to-date security authentication tools. Personal details you provide during the payment and authentication process will be used only for the purposes of processing your payment. Your bank may separately require you to use two-factor authentication through its systems.

We process your data in order to make appropriate payments to you and receive funds on your behalf, including:

- **Course Fees**

Our Finance team will process your data in order to identify the fees which you need to pay under your contract with the University and obtain payment of those Fees.

For all students, we process information about your nationality, country of residence and immigration status where this is relevant to determining your funding source (if any) and as required to determine your fee status, i.e. whether you are entitled to pay fees at the UK rate or required to pay at the overseas rate.

We then process information about your course/progression, your fees status and your source of funding and method of payment in order to issue invoices for, and receive and process payment of, your fees.  

If you apply for and obtain funding from the Student Loans Company (SLC), we will share some of your data with them in line with the terms and conditions of their loan to you. This will include information about your course, progression and attendance/registration, your fees status and your payment status with the SLC as necessary to enable them to enter into and monitor the agreement they have with

you and make arrangement for the payment of your course fees. We are required to inform SLC if you do not enrol on your course (after accepting an offer) or if you interrupt your studies or leave your course during the academic year.

If you obtain funding from another source (e.g. sponsor or non-UK government) we may also need to share your data with them in accordance with the terms on which they provide your support.

If you obtain financial support from US Federal funding, we will need to share your data with the US authorities including the US Department for Education, who also require us to retain indefinitely the supporting documentation you provide to us.



Necessary for the performance of the contract between us and/or the terms of an agreement you have entered into for financial support



Necessary for legitimate interests pursued by the Student Loans Company, i.e. applying their funding eligibility criteria and the terms of their loan agreements

▪ **Expenses**

If you are able to reclaim any expenses incurred, e.g. in the course of a BU research project, we will process information about the relevant activities and your banking details in order to determine whether BU can pay the expenses and to make payment as appropriate.

▪ **Scholarships, bursaries and BU Financial Support funding**

We process your data as necessary to make payment of any scholarships, bursaries or BU Financial Support funding you are awarded. This will include name, contact details, course and award details and payment information (e.g. banking details). This will include sharing data with Sodexo to enable payment by VISA pre-payment card to enable Sodexo to meet banking regulation requirements to “know your client/customer” 

▪ **Debt collection**

If you fail to meet your financial obligations to BU, we will process your data for the purposes of debt collection. If you do not respond adequately to our request to remedy any debt situation when given appropriate opportunity to do so, we may share your data with a third party contracted to provide debt collection services to BU (currently the legal firm Shakespeare Martineau). For these purposes we will process and share information about you, your fee status and fee liabilities, your payment or non-payment of fees, and your contact details. 



Necessary for the performance of the contract between you and BU



Necessary for legitimate interests pursued by BU: collection of debts owed to BU

To comply with legal and audit requirements we keep personal data relating to these Finance matters for a minimum period of seven years after the end of the tax year in which the relevant payment is made.

- **Complaints & discipline**

If you are subject to the student disciplinary process, we will process your data as required to complete this process. Further information is set out above.

- **Immigration Compliance**

If you are from the EU/EEA, your immigration status and the information we will need to process for immigration purposes will depend on when you entered the UK, but you should contact AskBU or immigration@bournemouth.ac.uk if you are unsure of your status.

If you have EU/EEA settled or pre-settled status, you will need to provide us with a copy of your passport and evidence of your right to study in the UK (this can be obtained from the Home Office website). You will need to provide this documentation during online enrolment.

If you require a Student visa in order to study in the UK, we will need to process your data for purposes relating to immigration and visa applications.

As described in the Student Recruitment and Admissions Privacy Notice, when you accepted an offer from BU we will have processed your information to issue the Confirmation of Acceptance of Studies (CAS) that you need in order to apply for a Student visa and to comply with our legal obligations under our Student visa sponsor licence. This may have included sharing your data with UK Visas and Immigration (UKVI) which is part of the Home Office within the UK Government.

We will carry out similar processing in respect of any application you make to extend your visa. As for the initial processing to issue a CAS, we may need to share information with UKVI in order to obtain information relevant to your eligibility to extend your visa. For a visa extension we also have to process financial information including bank statements. If your reasons for seeking an extension include an illness you have suffered, we may also have to process information about your health for these purposes.

Where you are given a Student visa, we are also required to report to UKVI on matters which may affect your visa status: this includes any interruption of your studies, change in course, withdrawal from the course or early completion.

We will retain any documentation you provide to us in support of a Student visa application (e.g. financial or medical documents) only for the period during which we are carrying out the assessment of eligibility for a CAS. Once the CAS is issued we destroy/delete this documentation.

We are required to retain some information collected for the purposes of our position as a Student visa sponsor under the immigration legislation for the duration of your studies, and some information must be retained for six years after completion of your studies. We are also required to share retained information with UK Visas and Immigration on request for audit purposes. This is in accordance with the current document retention guidance for student visa sponsors which is issued by UK Visa and Immigration.  

More information:

 Necessary for compliance with a legal obligation on BU: our obligations as a student visa sponsor/licence holder under the immigration legislation and immigration law requirements with respect to holders of EU settled status.

 Consent: you have agreed to this processing

- **Audit**

Your data which is held within our Finance or other administration teams may be viewed by BU staff carrying out internal audits or staff of external companies or organisations carrying out external audits of our operations. They will process this data only for the purposes of auditing our compliance with BU processes and legal or regulatory requirements. They will not use your data to contact you or take any decisions relating to you as an individual.

 Necessary for the performance of BU's core purpose as a statutory higher education corporation, to deliver higher education and carry out research, and the public functions of other organisations such as the Charity Commission, central government and the OfS with regard to ensuring appropriate use of charitable and public funds.

 Necessary for compliance with a legal obligation on BU: our obligations as a charity and our obligations to report to Office for Students

 Necessary for legitimate interests pursued by BU: ensuring the appropriate and efficient financial operations and governance within BU.

- **IT services and systems**

We process your data in the course of providing, maintaining and protecting the IT systems and network which we use to hold, access and create the personal data relating to you which is covered by this Notice. Some of this processing will be carried out by third parties who provide those systems to us or provide technical support services to us. These include

Tribal which provides the SITS (student records) system used for student records and our provider of out of hours IT support. Your data will be processed in the course of the following activities:

- **Holding data and hosting systems**

Much of the personal data described in the rest of this privacy notice will be held in electronic form in systems provided or hosted by BU, including systems we have procured from third party providers. Separate privacy information will be given to you about some of these systems. Some of your information may be held in cloud-based systems. We enter into agreements with IT service providers so that we have appropriate assurances in place regarding the functionality and security of their systems, to ensure that your data is processed in compliance with the data protection laws which apply in the UK.

- **Cyber security: protecting systems and data**

During the academic year 2021-22 we are asking students to complete a registration process so that we can use multi-factor authentication for access to BU systems and networks and operate a process where students are required regularly to re-set their BU password using an automatic password re-set service (SSPR). These measures help BU manage on-going cyber security risks and provide appropriate protection for all of the personal data and other information held on BU systems. The registration process asks users to provide personal contact details (personal email address and phone number other than a BU extension) and other personal information which will be used as the answers to security questions, although users can also choose to use an authenticator app on their smartphone (the Microsoft Authenticator app) as an alternative to using personal data for authentication purposes.

The details you provide for these purposes will always be kept securely within the Microsoft Office system (the BU Microsoft Azure tenancy). The information will only be used for authentication. The information will only be accessible to you (via your BU login to Office365) and to a small number of BU privileged administrators. (These administrators will have access to the contact information you provide but not any answers you provide for security questions). For further information see the [separate privacy notice](#).

- **System development and maintenance**

Where your personal data is held within BU IT systems it may be viewed or otherwise processed in the course of work to maintain, test or further develop the functionality or security of our systems. This processing may be done by BU staff or by third party suppliers of the relevant system or service providers. Access to these systems is limited to specific authorised professional BU IT or third party staff as

necessary for the purposes of their current responsibilities within their role at or for BU. This processing does not result in any communications with you or any decisions being taken which relate to you individually. BU is seeking to minimise the use of identifiable data for these purposes, and ensure that third parties carrying out this processing are subject to appropriate contractual requirements to maintain the confidentiality and security of your data.

○ **IT support services**

BU provides an IT support service to students. During standard working hours this service is provided by BU staff. Outside standard working hours (during evenings/nights, weekends and holidays) this service is provided by staff of an external service (currently the NorMAN service provide by Northumbria University).

Your data will be processed by IT support staff for the purposes of verifying your identity and responding to any requests for support that you make to this service. This may include accessing your personal BU accounts (e.g. email or Brightspace), following prior notification to you that this is necessary, and collecting information (from you) about you and about the nature of your need for IT support.

To enable the delivery of the NorMAN out of hours IT support service, we provide Northumbria University with your name, student and user ID numbers, BU and personal email addresses, home postcode, phone number, and course title. This is to enable NorMAN to verify your identity so that you can use the service, to access your accounts/services on the BU system and to work with you to resolve your IT issue. NorMAN will share with the BU IT Support team information about you (your name and user details) and your query if they have been unable to resolve it during the out of hours period.



Necessary for the performance of the contract between you and BU



Necessary for performance of BU's core public task, i.e. delivery of higher education and research



Necessary for compliance with legal obligations on BU, i.e. obligations under data protection legislation to keep personal data secure



Necessary for legitimate interests pursued by BU, i.e. operating and improving IT systems appropriate to the work of the organisation

(f) After you finish your studies at BU

• **Graduation**

If you wish to book guest tickets for your graduation, we will need to share your name, email address, phone number, ceremony date and time, the number of complimentary tickets you order, and any accessible guest seating requirements with our third party service provider BH Live, which operates the venue we use for graduation ceremonies (the Bournemouth International Centre) and provides associated ticketing services to BU. This data will be used only for the purposes of running the graduation event. 

With your agreement, we will publish your personal data (your name and course) in information relating to graduation award ceremonies for your course. 

We film the graduation ceremony and broadcast the footage on-line both live and after the ceremony. We also take photographs and footage throughout the day of graduation ceremonies and post this on social media 

Before graduation we provide some of your data to Ede & Ravenscroft, who have a contract with BU for provision of gowns to graduating BU students. This enables you to order and pay for your gown through Ede & Ravenscroft's on-line system. We may also share data with a third-party contractor (Stageclip) so that it can create and provide access to a film clip of your participation in the graduation ceremony. 

More information: We publish your name and course details in the graduation ceremony booklet which is available to everyone attending a BU graduation ceremony. We provide Ede & Ravenscroft with your name, student ID number, email address, required graduation gown and the likely date and time of your degree ceremony.

When you register online to attend the award ceremony or choose to graduate in absence you will be asked whether you consent to your data being published in this way. If you do not consent, this will not affect your ability to attend or participate in the graduation ceremony.

 Consent: you have agreed to this processing

Film footage of all of our graduation award ceremonies are broadcast online and will be available to view online afterwards. The film will be live-streamed through the BU website, and will later be available to view on You-Tube. If you have any concerns about this, please contact askbu@bournemouth.ac.uk to discuss: however please note that we are unlikely to be able to guarantee your privacy, particularly with regard to the live-stream.

If we decide to procure the service from Stageclip we will provide Stageclip with your name and degree award (type of degree and programme title), and possibly your email address. You will be given access to the film clip they produce of your participation in the degree service.

BU also takes photographs and films throughout the day of the Graduation ceremony, and includes some of these films and photographs in frequent social media posts. Please see our website [<https://www1.bournemouth.ac.uk/about/governance/access-information/data->

protection-privacy/use-personal-images] for our standard information about use of personal images recorded at BU events. However, due to the size and nature of the graduation event we are unlikely to be able to guarantee that we will not include particular individuals in photographs, film or social media on the day. Again, please [contact us](#) if you have any queries or concerns about this. We will take into account any concerns or objections you have in relation to future use of photographs in our marketing or publicity materials.

In general, you need to be aware that a very large number of people attend our graduation ceremonies, and BU has no control over the actions of attendees with regard to the taking, sharing or other use of either still or moving images. 



Necessary for legitimate interests pursued by BU: celebrating student achievement and providing participants with records of the day, promoting BU, facilitating cost-effective procurement by students of correct graduation gowns.

- **After Graduation**

We will retain your data as collected or generated for the reasons given above, in accordance with our retention policies (see below).

With your consent, we will provide information on request to verify the title, class and date of any degree you have been awarded by BU to third parties such as future employers or other universities. We currently do this through the HEDD service provided by Jisc, and you will be asked to confirm consent to this verification check before it can proceed.

We may continue to process your data within our Careers service (MyCareerHub), if you take up your ability to use this service for up to three years after Graduation. You will be provided with a new graduate log-in for MyCareerHub for this purpose, and will be given updated specific privacy information about processing of your data within MyCareerHub.

You may be contacted with invitations to participate in external national surveys about your student experience at BU as described above.

All postgraduate research students are required to deposit a digital copy of their thesis with BU's Library and Learning Support Service. Save in exceptional circumstances, theses will be available as open access in BURO, BU's institutional repository, and on requisition with EThOS.

Your name, contact details and information about the course you followed at BU and the degree you obtained will be transferred into our Alumni database. Please see the separate [Alumni and Fundraising Privacy Notice](#) for information about how and why we use this data after you leave BU. You will be able to retain and use your BU student email address for up to three years after you complete your BU course (subject to certain conditions and regular use of your account): we will process your name, email address and information about your access to/use of your email account for the purposes of account management and maintaining security of BU systems and network.

- **Additional future reasons for processing**

In addition to the original basis for processing your data as set out above, there may be situations where the basis for our processing changes over time due to developments in circumstances or in our relationship with you. We may then rely on a legal basis for processing which is not mentioned above.

We may originally process your data on one basis, but then find that it is necessary to retain it and carry out further processing for other reasons even where the original basis no longer applies. For example, we may originally have collected and processed your data on the basis of consent or legitimate interests, but subsequently identify a need to process it for the purposes of managing a legal claim or process, or to protect the vital interests of you or another person. If at any point you have concerns or questions about the basis on which we are processing your data, please contact our Data Protection Officer.

5. Sharing your data with third parties

This section describes when and why we share your data with third parties where this is not covered in section 4 or a separate privacy notice you will be given in respect of certain specific activities or services if they become relevant to you. In this section and section 4 we provide details of planned, regular data sharing and types of one-off data sharing which we know will usually arise in relation to one or more students in the course of an academic year. There may be additional one-off circumstances in which we share data with third parties which are not covered in this Notice or other privacy information, such as where a government or other public sector body exercises a legal right to require information in relation to a specific situation. We will only share information with third parties where satisfied that the sharing complies with the data protection laws.

- **Parents/guardians and other family members**

We do not usually share your personal information with your parents, guardians or other family members unless we see appropriate evidence that you have expressly agreed to this (this would normally mean a signed written statement of your consent). Under the data protection laws, only the relevant individual has legal rights to access and control the use of their personal data (identifiable information relating to them). Parents/guardians do not have automatic rights to access their children's personal data at any stage, and they have no specific status or rights in relation to information about their children who are over the age of 18. Information can be shared with family members only where we can identify a clear legal basis for the sharing under data protection laws.

We will share information about you with your parents/ guardians or other family members only where:

- We are satisfied that you have given your clear consent to the sharing; 

- You are under 18 and the sharing is in line with our policies in relation to Under 18 students: you will have been given details of these policies and information-sharing arrangements in our Under 18 Information Pack; or 
- We consider the sharing to be necessary in your vital interests or to safeguard your welfare as a vulnerable person (see exceptional circumstances section below). 

More information: We do not ask you to give advance consent at the start of the academic year for us to share information with your parents generally or in certain future circumstances. We consider that consent to share information is not valid without knowing all the relevant circumstances.

If we know that you are experiencing health difficulties or other matters affecting your welfare, when providing support to you we may suggest that you speak to your family or ask for your permission to contact your family, if we consider that this may be helpful to you. Exceptionally we may contact family members to share information without your consent. This would happen where either it is not possible for you to give consent or it is not appropriate in the specific circumstances for us to ask for your consent, and where we consider that sharing the information is necessary in your vital interests or to safeguard your welfare when you are vulnerable (e.g. in a medical emergency so that appropriate decisions can be taken about your medical care, or to enable you to be removed from a situation which poses a clear risk to your health, safety or welfare).



Consent: you have agreed to us sharing your data



Necessary for the purposes of substantial public interest, i.e. safeguarding vulnerable people



Necessary for legitimate interests pursued by BU, i.e. ensuring we can recover money owed in respect of students under the age of 18



Necessary to protect your vital interests

- **Students Union (SUBU)**

All BU students are eligible for membership of the Bournemouth University Students Union (SUBU). If you decide during online registration at the start of the academic year to become or remain a member of SUBU, we will pass some of your basic contact and course information to SUBU to facilitate the administration of SUBU and we provide SUBU with updates to this information through the year. 

When BU students log into the SUBU website for any reason, the SUBU system automatically links to the BU system to verify your student status and confirm whether your details are linked to a SUBU member account. For students who are not SUBU members, the link will provide SUBU with limited personal information so that you can log into the SUBU website as a student guest.

With your agreement, when you book your graduation from BU we pass your name to SUBU for inclusion in graduation merchandise. 

More information: All BU students are eligible for membership of the Bournemouth University Students Union (SUBU). SUBU is a separate organisation from BU and has its own legal status. However BU has a legal obligation to support the fair and democratic operation of SUBU.

When you complete online registration as a BU student you will be asked whether you wish to opt-out of membership of SUBU. If you do not opt-out of membership, you will automatically become a member of SUBU and we will share with SUBU your name, date of birth, details of your course [including type, level and duration of course, whether you are on a placement or exchange programme, what stage you are at in your course], your gender, your fee status, your student ID number, your BU email address and your library card number. This is to enable SUBU to establish and administer your membership, carry out other core SUBU activities (including administration of voting rights and elections) and send you communications relevant to you. This data is transferred to SUBU through their third party data processor which provides the systems SUBU uses for managing its membership. We provide SUBU with updates to this data when it is changed on our systems (e.g. if you leave BU or change your course), through a frequent automatic data feed from the BU system to Union Cloud/SUBU. 

When you log into the SUBU website, this links automatically to the BU system to verify your log-in details against your BU student account. For students who are SUBU members, this link will connect your log-in to your SUBU membership account. For students who are not SUBU members, the BU system will provide the SUBU system with your name, student ID number, email address, BU Faculty and confirmation of your BU student status. This is used to enable you to log into the SUBU website as a confirmed BU student, so that you can access events and activities which are open to BU students and vote in the course and Faculty representative elections which are run by SUBU on behalf of BU. Where it cannot link your details to a SUBU member account the SUBU website may also offer you the option to become a SUBU member. The data shared through this automatic link is used only for these purposes and within the SUBU system, and is not viewed by or accessible to any SUBU staff. After we share your data SUBU will be responsible for compliance with data protection law in relation to its processing of that data. SUBU will contact you direct regarding your membership and to provide you with access to SUBU systems and services. SUBU will provide you with separate privacy information about how it will process your data for its purposes. 



Necessary for compliance with a legal obligation on BU: its obligations under the Education Act 1994 as to governance of SUBU and protection of the interests of students who opt out of SUBU membership.



Necessary for the performance of a task carried out in the public interest: the functions of BU and SUBU under the Education Act 1994, including SUBU's function of representing students



Necessary for legitimate interests pursued by BU and SUBU: efficient and effective management of membership by SUBU, facilitating the fulfilment of

students' rights to student union membership, representing the interests of students.

When you book your place at a BU graduation ceremony, you will be asked whether you agree to your name being passed to SUBU for inclusion in relevant graduation merchandise.

 Consent: you have agreed to this processing

- **Bournemouth, Christchurch & Poole Council: Council Tax and electoral purposes**

We automatically provide information about you to Bournemouth, Christchurch & Poole Council (BCP Council) for two purposes: to enable the Council to manage and apply the Council Tax exemption which applies to properties solely occupied by students, and to assist it with management of the Electoral Register.

In December each year we provide BCP Council with the names of all of our students, together with the programme codes of each student's course and the start and anticipated end date of the student's programme of studies. This enables the Council to ensure that they correctly apply the Council Tax exemption for properties solely occupied by students. The Council is not permitted to use this data for any other purpose.

We also separately provide BCP Council with information about you to assist it in managing the Electoral Register. The Council uses this to identify students who would be eligible to vote and to contact them to invite them to register to vote. For use in connection with these purposes only, we provide the Council with your name, date of birth, nationality, home address, term-time address and your BU email address.



In addition, we assist the Council with its electoral registration functions by providing you with an opportunity to register to vote in the BCP area during annual online registration (if you are eligible to register on the basis of your term-time address). If you take up this opportunity, with your agreement we provide the Council with required information from your BU student record, your national insurance number and information about your electoral registration preferences.



More information:

You do not have to complete the electoral registration process within online registration: we do this only with your agreement. If you do complete the electoral registration form within online registration, we are acting as data processor for the Council in sharing information in the form so that they can determine your eligibility to be registered to vote and confirm your registration where appropriate. The form will automatically collect information from your student record (name, date of birth, nationality, term-time address, your BU email address and your national insurance number if BU already collects this for other purposes) and will ask you to provide additional information required by the Council (national

insurance number if not already collected by BU and your preferences regarding inclusion on the open electoral register and as to voting methods). This is shared with the Council using secure methods, and they will contact you directly to confirm whether your electoral registration has been completed or engage with you further as required.

 Necessary for tasks in the public interest: the Council's public tasks in relation to Council Tax and management of the electoral register (regarding electoral registration these are activities supporting and promoting democratic engagement, within section 8(e) of the Data Protection Act 2018).

 Necessary for legitimate interests pursued by the Council and BU: ensuring students have access to Council Tax exemptions and voting rights

 Necessary for compliance with a legal obligation on BU: under the Representation of the People (England and Wales) Regulations 2001, the Council can require the provision of information required for the purposes of their duties in maintaining Electoral Registers. In addition, OfS conditions of registration require BU to facilitate the electoral registration of students.

 Consent: you have agreed to this processing: we only process your data within the direct registration facility if you agree to this.

- **Non-routine data sharing in exceptional circumstances**

We will share personal data with emergency services and/or the person you have identified to us as being your next of kin or emergency contact, where this is necessary to safeguard your position or that of other individuals. 

We will also share personal data with the police or other organisations with responsibility for investigating potential crimes such as fraud (e.g. local authority fraud investigation teams) where satisfied that this is necessary for the prevention or detection of crime. 

This may include sharing special category data such as health information 

We will also share your information (including name and address) with Bournemouth, Christchurch & Poole Council where this is requested under their statutory powers for the purposes of environmental protection (e.g. noise abatement issues).

More information: Depending on the nature of the situation which has arisen, sharing with the emergency services could include sharing information with the police, National Health Service organisations and the Fire Service.

 Disclosure is necessary to protect your vital interests, i.e. where you are at clear risk of harm, or to protect the vital interests of others e.g. if they are at risk of harm from your actions. We will only share special category data on this basis if it is not possible or appropriate for us to obtain a valid consent from you to the disclosure



Where the police have told us, and we are satisfied that this is the case, that sharing your data with them is necessary for the purposes of preventing or detecting crime, or where we have suspicions regarding the commission of the offences that we consider it appropriate to pass to the police for investigation



Disclosure is necessary for the purposes of protecting you or others from risk of harm, or for prevention/detection of crime: these are purposes in the substantial public interest.

6. Transfer of your data outside the European Economic Area (EEA)

Data protection laws limit our ability to transfer personal data outside the countries within the EEA (i.e. the countries which are subject to the same or very similar data protection laws). This is to help ensure that a consistent level of data protection applies to your data at all stages of processing, and that you are not exposed to additional privacy risks through the transfer of your data. Transfers of data outside the EEA are only permitted in certain circumstances.

We have given information in sections 4 and 5 about specific situations in which your personal data is or may be transferred outside the EEA. Aside from these situations there may be a transfer of your personal data outside the EEA in the following circumstances:

- Where we use a cloud-based IT system to hold your data, and the data in the cloud is stored on servers located outside the EEA. In these circumstances we safeguard your data through undertaking appropriate checks on the levels of security offered by the cloud provider and entering into a contract with them which applies protections of the same type and level required by data protection laws within the EEA;
- Where you are based outside the EEA and we need to send you emails or other communications which are necessary for the performance of our contract with you or for implementing pre-contractual measures which you have asked us to take [(e.g. processing an application or enquiry)] or [(e.g. making arrangements for you to commence your studies at BU)]. In these circumstances the data protection laws say that transfer is permitted; or
- With your consent.

7. Retention: how long will we keep your data for?

We have given information in sections 4 and 5 about the length of time for which we will keep your personal data in connection with some categories of processing/data. BU is undertaking a review of its retention policies and future versions of this Notice will contain links to the detailed retention schedules which are being developed in each BU Faculty and professional service.

In general, we apply the following principles to determine for how long we will keep your data:

- Much of the personal data we hold, including within your student files and in our Finance department, will be kept during the period of your BU course and for several years after you leave BU. We keep this data to enable us:
 - to manage your course/education efficiently and effectively and provide you with appropriate support during your time at BU
 - to respond to queries or concerns you have about your experience at BU either during your time here or afterwards, and to defend any legal claims brought against us; and
 - to comply with legal and regulatory requirements as to accounting and audit.
- A small amount of data will be held indefinitely: this is the data that we need to hold so that we can confirm whether individuals attended BU and the qualifications they obtained here.

8. Your rights as a data subject and how to exercise them

Under the data protection laws you have a number of rights in relation to our processing of your data. In summary these are:

- Right to request access to your data as processed by BU and information about that processing [“subject access request”]
- Right to rectify any inaccuracies in your data
- Right to request erasure of your data from our systems and files
- Right to place restrictions on our processing of your data
- Right to object to our processing of your data
- Right to data portability: where we are processing data that you have provided to us, on the basis of consent or as necessary for the performance of a contract between us, you have the right to ask us to provide your data in an appropriate format to you or to another controller.

Most of these rights are subject to some exceptions or exemptions, depending on the purposes for which data is being processed.

If you have any questions or concerns about our processing of your data, please contact the **BU Data Protection Officer (DPO)**:

Email: dpo@bournemouth.ac.uk

Telephone: 01202 962472

Address: Poole House, Bournemouth University, Fern Barrow, Poole BH12 5BB

If you would like to exercise any of your rights as outlined above, you can contact the DPO as above or visit the Data Protection page on our website [<https://www1.bournemouth.ac.uk/about/governance/access-information/data-protection-privacy>] to access the relevant forms.

We will always aim to respond clearly and fully to any concerns you have about our processing and requests to exercise the rights set out above. However, as a data subject if you have concerns about our data processing or consider that we have failed to comply with the data protection legislation then you have the right to lodge a complaint with the data protection regulator, the Information Commissioner:

Online reporting: <https://ico.org.uk/concerns/>

Email: casework@ico.org.uk

Tel: 0303 123 1113

Post:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF