

## **Applicant and Student Privacy Notice**

### **About us**

This Privacy Notice explains the nature of the personal information that the University and the Henley Business School processes for the purposes of administering applications from prospective students and the provision of teaching and learning to current students.

The University and the Henley Business School (**We** or **Us**) are data controller in respect of the information that We process about you. Our contact details are The University of Reading, Information Management and Policy Services, Whiteknights House, Whiteknights Road, Shinfield, Reading, RG6 6UR.

This notice explains what personal information We collect, hold and share in support of these purposes and your rights in respect of the data We hold about you.

Your privacy is important to Us, so if there is anything in this privacy notice that is unclear or you do not understand, please contact Our Data Protection Officer at: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)

### **Data we collect about you**

To manage its operations effectively, provide services to you, and meet certain legal requirements, We need to collect, record, store, use, share, retain and destroy (this is known as 'processing') your personal data. Over your time with Us, we will collect and process a number of different types of personal data.

#### **Studying at the University of Reading and Henley Business School**

To provide you with educational support from application to graduation, We will process a number of different types of personal data including your name, address, contact details, previous education, date of birth, domicile, marital status, qualifications, programmes studied, fee payments and information about your tutorials, examinations, assessments and results. We will collect this information from you directly, via forms and applications, or we may collect it from third parties including previous education providers, application service providers, exam boards, referees, employers, relatives, agents and sponsors.

Your personal data will be used by Us to provide you with general services, such as accommodation provision, access to the Library, educational resources and computer facilities, and support, such as careers services, guidance tutors and study advice.

We may also process data that relates to disciplinary matters, complaints, engagement with your studies and resources, or fitness to practice proceedings where applicable.

In certain circumstances, We may process personal data relating to your criminal convictions. The type and scope of criminal convictions data that We process will depend on whether you are an applicant, an offer holder, or a current student and whether you are studying on a Regulated Course. Further information about how and why we process this data is set out in our Criminal Convictions Disclosure Policy (Students and Applicants). We will process criminal convictions data where it is necessary for the purpose of the prevention or detection of unlawful acts, and/or to safeguard the welfare of the individual or third parties. Where applicable, We may also process criminal convictions data for the purposes of meeting our obligations relating to public protection.

## Recording of teaching and learning activities, including Learning Capture

It may be necessary for us to record teaching and learning sessions, that may feature you, for the purposes of:

- Ensuring that all students can access teaching and learning content. When a student is unable to attend on campus sessions because of Covid-19 travel or quarantine restrictions, and it is not reasonable to expect them to attend an online session because it is scheduled at a time that is outside of usual teaching hours (9-6) in the country or region they are based in.
- Assessment, such as recording of clinical practice for summative assessment; recording a coaching session for formative feedback; recording a presentation when an assessor is unable to attend.
- Making a reasonable adjustment under the Equality Act 2010. Should a student require a recorded session as a reasonable adjustment, a recording may be made for these purposes • When a student's employer has sponsored them to attend a University programme on a parttime/flexible basis, and the University has agreed to make all sessions available to all students on that programme even where a student's work commitments mean they can't attend some of the sessions at the scheduled 'live' time. An example of where this will apply is in the context of some of Henley Business School's Apprenticeship programmes.
- When a specific exceptional case has been approved by a Teaching & Learning Dean (in liaison with Legal Services/IMPS).

You will always be notified when recording is taking place. Circulation of recordings will always be on a limited and need to know basis and will be subject to a University Retention Schedule. More detailed information can be found within our 'Recording of Teaching and Learning content' notice located at: <http://www.reading.ac.uk/internal/imps/DataProtection/imps-d-p-privacynotices.aspx>

## Engaging in social life at the University

We will also process your personal data if you have subscribed to additional services We offer, such as registering as a member of the Sports Park. Some of the additional services the University provides may have separate Privacy Notices that you will be directed to when you book, join or subscribe to those services. Activities operated by the Students Union are separate to those services that We provide and are governed by separate privacy arrangements. More information can be found at <https://www.rusu.co.uk/>.

## CCTV, ANPR and security cameras

The University has a comprehensive, image-only CCTV surveillance system across its campuses. Cameras located on and within buildings are monitored by trained staff from the building or School whose areas the cameras are designed to protect, and Security Control. Full details of the purposes of the monitoring, access to images and staff training are governed by the University's CCTV Code of Practice.

Every vehicular entrance to the Whiteknights campus has an automatic number plate recognition (ANPR) camera that monitors cars entering and leaving the campus 24 hours a day. Data gathered via ANPR will be used in the review of traffic and parking on campus.

Body worn cameras (BWCs) may be used by the University's Neighbourhood Street Wardens during their patrol duties around the University estate, and surrounding neighbourhood. Neighbourhood. The BWCs may capture images and audio and, where used, will be used for the purposes of monitoring anti-social behaviour and maintaining a safe and orderly environment. We may use images and audio obtained via BWCs when sought as evidence in relation to student disciplinary proceedings. In limited circumstances, it may be appropriate to disclose images and/or audio to a third party, such as when a

disclosure is required by law, in relation to the prevention or detection of crime, or in other circumstances where an exemption applies under relevant legislation.

### **Profiling and Learning Analytics**

We may also conduct profiling activities where We collate data on your attainment, attendance, interactions with academic resources, such as Blackboard (our Virtual Learning Environment) dates and details of submissions of assessed work, and any personal extenuating circumstances. This data is used to monitor progress on your chosen course and to enable the University to offer personalised support and guidance during your time studying with Us. More information regarding attendance and engagement monitoring can be found at: <https://www.reading.ac.uk/essentials/Study/Attendance-and-engagement>.

### **Sensitive (special category) personal information**

In addition to this, We may process some personal data which is more sensitive (this is known as special categories of personal data), such as details about your ethnicity, sexual orientation, gender identity, health and disability to facilitate the monitoring of equal opportunities, to provide you with support and assistance, to administer placements, and for statistical and research purposes. If you seek support from our Wellbeing Services teams, including disability, they will also collect sensitive information from you and process it in order to provide you with their support services.

We may collect this data directly from you or via third parties such as UCAS or agents that are acting on your behalf.

### **Equal opportunities and Widening Participation**

The University will use some personal and sensitive data that you provide to monitor equal opportunities, for example to record ethnic diversity of our students and to inform plans for improving diversity and inclusion across the University.

The University also has a commitment to widening participation, which is used to describe activities that aim to assist students from under-represented groups and disadvantaged backgrounds to go to university, as well as providing targeted measures to help those groups succeed during their studies.

The aim of widening participation is to ensure that all those who have the ability to benefit from higher education have the opportunity to do so.

Personal data such as the area you live, what type of school you previously attended, any special educational needs, eligibility for free school meals, carer status, disability, ethnicity and whether your family members attended University is used to identify whether We can put in place any measures to help with your access to Higher Education, and also to provide any additional support, including careers support, whilst you are studying with Us.

The data We use to do the above will always be treated in the strictest confidence, held securely and only accessed by limited individuals involved in the above activities.

Any reports that are published will not disclose information that could identify you.

### **Engaging with Us,**

We may hold other information that you have voluntarily shared with Us as part of your engagement with the University.

Where you engage with Us, either through the University Website or other campaigns or email correspondence We may use cookies to monitor and record your engagement with Us. Please see the [Website Privacy Notice](#) for more information on how We use cookies. Other specific Universities activities may have additional Privacy Notices that will be provided and that you should refer to.

## COVID-19

Where required, we will collect, and use existing, data for the purposes of administering Test and Trace procedures. This will be requested, or collected, when you visit University Venues that are subject to Test and Trace requirements as set out within government guidelines. Additional signage will be on display in these locations.

We will also collect and use data, for example, attendance lists for our teaching spaces and University accommodation records, to support University outbreak response and control measures.

Where applicable, we will also be required to collect vaccination status, where this is a requirement for any placements in health or social care settings.

More detailed information can be found within our 'COVID-19' notice located at:  
<http://www.reading.ac.uk/internal/imps/DataProtection/imps-d-p-privacynotices.aspx>

## Our lawful basis for uses of your data

Under data protection laws We must have a legitimate and lawful basis for processing your personal data. There are several lawful grounds within data protection law that apply to the different data that We are processing, and these are explained below:

### **For the performance of a contract (or negotiations entering into a contract)**

This will apply to any personal data that We process for the purposes of administering and delivering your course of study and related activities that support delivery of your course, including additional services We offer such as careers support and internal and external events opportunities that may support of your studies.

The vast majority of uses of your personal data will be for this reason and will apply to the data we collect when you apply for a course of study, through to your graduation.

### **For the performance of a task in the public interest**

Some uses of your personal data are required so We can meet our obligations or duties, or to exercise our powers, as a public authority, or to support the functions of other authorities that have a public task defined within law or statute. Examples of this would include our obligation to share data with the Higher Education Statistics Authority and the Office for Students. We may also collect and retain data to support public health or safety, safety (such as COVID-19 response), safeguarding or crime prevention measures, or the need to retain a basic record of students that have studied with us and their attainment for verification of award purposes. We may also be required to share personal information with our external regulators, auditors, assessors, and professional bodies. In all cases the personal data shared will only be that which is necessary for the purposes and subject to the University having measures on place to ensure that data is handled in line with data protection laws.

### **To protect life**

In some circumstances We may need to collect or share personal data when it is in a person's vital interests to do so. For example, We may share your personal information with the emergency services, parents, guardians or next of kin, or between internal departments, such as security, our hall wardens, our accommodation service providers and welfare teams if there is significant and credible evidence to suggest that you, or someone else may be in danger or at significant risk of serious harm. You will have opportunities to consent to the University discussing personal matters with your parents, guardians or next of kin, your doctors, or others that you elect, and We will only share limited and necessary information without your consent in exceptional circumstances where significant risk of serious harm is identified.

## Legal obligations

In some circumstances We may be required by law to collect, hold or share your personal data. For example, if We are ordered by a court of law to disclose information or to meet financial, regulatory, or statutory reporting and auditing obligations.

## For legitimate interests

In some instances We may process your personal information where we judge the use to be within our legitimate interests (or the legitimate interests of another party) and where we do not deem this to be a privacy intrusive or a risk to your own rights and freedoms. For example, we may need to process personal information for the purposes of monitoring IT security and identifying or rectifying issues with our IT services. Where the use of data poses negligible risks to individuals and is for the purposes of improving services or investigating technical issues, this is likely to be the basis that will apply.

Photography and or filming across the University, where you are not the focus of any footage (such as wide crowd shots) may also rely on this basis.

## Consent

We may also process your personal information with your consent. Consent must be freely given, informed, specific and We must keep a record of that consent. Where you have consented to a use of your data you will have the right to withdraw that consent at any time. An example may be where you have given us consent to discuss your circumstances with a representative or family member or where you wish to receive some types of communications from us after you have completed your studies.

## Special Category (including criminal convictions data)

Where We process special category personal data (including criminal convictions data) We are required to establish an additional legal basis for doing so. Some of the lawful grounds that will apply when We process special category personal data include explicit consent, protecting the vital interests of the data subject, the monitoring of equal opportunities, occupational health monitoring, the performance of tasks in the public interest including public health, the provision of health care systems/services, the establishment, exercise or defence of legal claims, and/or safeguarding children and individuals at risk.

## Who we share your data with

We may disclose necessary personal data to third parties, where there is legitimate need, statutory or regulatory requirement or obligation, during or after your period of study. Such disclosure is subject to procedures to ensure the identity and legitimacy of such third parties. These third parties may include the following depending on your individual circumstances:

### Medical Practices

The University provides your name, and student ID to the local medical practice subject to data sharing agreements. This will be transferred to assist students with enrolling with a local GP and is shared on the basis of legitimate interests. If you do not choose to register with a local GP, your details will be deleted from the practice database.

### The Students' Union (RUSU)

Some students' personal data will be shared with Reading University Student Union (RUSU) for the provision of their services. These transfers are governed by the Data Sharing Agreement between the University of Reading and RUSU. This data is shared to ensure that RUSU can send you information about activities, societies and membership of the Students Union and is shared on the basis of legitimate interests. You can contact RUSU if you do not wish to receive these communications.

### Local Authorities

In order to administer exemptions of properties from council tax students' personal data will be shared with Reading, Wokingham and Bracknell Forest Borough Councils; this is described on the Council Tax page at: <https://www.reading.ac.uk/essentials/Accommodation/Council-tax>. A list of currently enrolled students is sent to these councils once a term (three times a year). The list includes the following information: academic year, student number, name, start and expected end date, mode of attendance, status, department, and programme.

We may also share information with Local Authorities where it is for the purposes of prevention or detection of anti-social behaviour and the collection of taxes.

This information is shared for the purposes of administering a public task in the public interest.

### **Turnitin®**

The University makes use of the Turnitin® UK system for the purposes of enabling assessors to check students' work for improper citation and potential plagiarism. The system creates a textual similarity review by comparing students' work against a variety of sources. Students are therefore required to provide a limited amount of personal data, for instance name, email address and course details and submissions, to Turnitin® when using the service. On request, the University may share anonymised assignments with other educational institutions in order to meet those purposes. Copyright of your submitted assignments remains with you as the student author. The University is responsible for ensuring that the transfer and security of the data shared with Turnitin® is fully compliant with data protection legislation. The data is shared in connection with the performance of your student contract.

### **Higher Education Statistics Agency (HESA), HE funding councils, Office for Students (OFS), Department for Education (DFE) and other government bodies**

Your personal data will be provided to HE funding councils, government bodies and HESA. Further details about the data shared with HESA can be found in the [HESA-Student collection notice on the HESA website](#). This information is shared for the purposes of administering a public task in the public interest. Personal data may also be shared for the purposes of monitoring widening participation and access to education.

Where required We will share data with Department of Health and Social Care/Public Health England (or equivalent government bodies involved in COVID-19 containment measures) for the purposes of supporting Test and Trace procedures and managing local outbreaks.

### **National Student Surveys and Post Graduate Outcomes**

The University is required to pass data about its final year undergraduates to the Office for Students, or their agents, in order for them to carry out the National Student Survey. This survey gives final year students the chance to give feedback on their experiences at the University and so informing the choices of prospective students. It is described in detail on the National Student Survey website.

The University will pass your name and contact details to the agent carrying out the survey. The agent may then contact you to take part. You do not have to take part in the survey and you can opt out at any time by contacting the agent and providing them with verification of your identity by confirming your date of birth.

The Graduate Outcomes survey is a new national survey conducted by the Higher Education Statistics Agency (HESA). The aim is to gain insight into the perspectives and activities of graduates nationally across the UK, around 15 months after completing their course. Some of the results may be used by the government and other third parties, for example university league tables, to inform measures of student outcomes from Higher Education.

It is also very important to us to learn more about what our students choose to do after completing their degree; this provides us with additional information to evaluate our courses and Careers support.



To support the survey, We are required by HESA to hold accurate contact details for you, including a personal email address (not a reading.ac.uk address), at least one telephone number, and a postal address (this can be a parental/guardian address).

The survey is owned by HESA, who have published more [information for students](#) as well as [guidance on how your contact details will be used](#).

We share this data with National Survey providers and HESA in order that they can invite you to complete the surveys. The Surveys are voluntary and you will be given the option to not participate in the survey when you are first contacted. This information is shared for the purposes of administering a public task in the public interest.

#### **Business School rankings data (Henley Business School Alumni only)**

The Henley Business School share limited course and contact data with the Financial Times who may contact you after your studies and invite you to take part in a survey. The results of this survey are used to compile rankings data that provides information on the outcomes of business courses. This information is published by the Financial Times. Participation in the survey is entirely optional and the results will not be published in a way that will identify you. The Financial Times will not use the contact details for any purposes other than to conduct the survey, and they will not be shared with any other parties.

#### **Other Higher Education (HE) institutions, Employer placements, Apprenticeship schemes**

Where students are involved in exchange, placement or apprenticeship programmes, joint or double programmes or similar study arrangements, or employer placements, the University may disclose their personal data, including sensitive personal data such as any disability information they may need to be aware of in order to consider any reasonable adjustments, to the partner institution (or related organisations) for the purposes of administering the programme, monitoring of progress and assessment. Students that are studying abroad as part of these arrangements should be aware that their personal information may be sent to, stored and used by overseas partner institutions (and related organisations) who may have data protection laws that differ to our own. The data is shared in connection with the performance of your student contract, or with your consent, dependant on the circumstances, and are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information.

#### **Accrediting bodies or organisations**

On some courses of study We may be required to share personal data with bodies or organisations that provide professional accreditation. This may include registration data such as name and contact details and/or graduation data such as the names of students who have completed the course. This is for the purposes of monitoring the quality and effectiveness of those courses, for example reporting on our student numbers, attainment, and demographics. It also enables professional accrediting bodies to register you to practice as a professional in your chosen field. We may also share information to assist the accrediting or regulatory body with its statutory duties.

#### **Sponsors, student loan organisations and scholarship schemes**

Where students have a sponsor, scholarship scheme or a loan provider (for example the Student Loans Company or Student Universal Support Ireland), the University may disclose student personal data to these organisations to assist with administration of applications and to determine whether support should continue. Personal data about students may be disclosed to third parties attempting to recover debt on behalf of the University where internal procedures have failed. The data is shared in connection with the performance of your student contract. Some scholarship schemes will be subject to you, or the University, sharing details of your progression with your funders.

#### **Placement Providers**

Where students are undertaking placements as part of their studies, for example within schools, industry, or health trusts, We will share personal data for the purposes of administering the placement, including feedback on progress. Some placements, particularly those in health and education will also require data to be shared for the purposes of safeguarding, public health protection, and assessing fitness to practice and fitness to teach.

#### **Parents, guardians and other relatives**

Other than in the most exceptional of circumstances, the University will not disclose a student's personal data to parents, guardians and any other relative. If students have provided a nominated contact in the event of a medical problem or emergency, then some personal data may be provided. This information is shared with your consent unless We believe it is in your vital interests, or the vital interests of another, to do so.

#### **The University estate, halls and accommodation (including the University Partnerships Programme - UPP)**

The University shares information with third parties managing the University's estate, halls and accommodation. The section <https://www.reading.ac.uk/essentials/Accommodation/University-Accommodation/a-z-halls-handbook> gives details of the nature and purposes of the sharing. This also extends to student property managed by Unite. This information is shared in connection with the performance of your student or accommodation contract (s).

#### **Employment agencies, prospective employers and third parties requesting confirmation of awards**

The University will routinely require the consent of students before disclosing details of any award. However, in circumstances where there is any reason to suspect the validity of an award declared to any of the above, or where a false declaration of an award is suspected, We may share limited information as to whether the award declared matches our records without consent, where this is the case, it will be shared for the purposes of performing a public task in the public interest.

#### **Police, crime and taxation**

The University may have a power or obligation to provide information to the Police or other organisations that have a crime prevention or law enforcement function, such as Benefit Fraud Sections within Local Authorities, if it is necessary for the prevention or detection of a crime, the apprehension or prosecution of offences, or the collection of taxes. This information is shared for the purposes of performing a public task in the public interest or where there is legal obligation.

#### **Third parties that help us deliver our services**

We also use third party providers ('Data Processors') to deliver our services, including externally hosted software or cloud providers, such as Microsoft, Blackboard and Canvas (who provide our virtual learning environments), Microsoft, Jobtrain (who host our Campus Jobs systems) and Agresso (who host our finance database), and those involved in managing payments, event bookings, catering and leisure services. These parties act solely on our explicit instructions and Were we do this We have measures and terms in place with those providers to ensure that they also protect your data.

## **Retention of your data**

Retention of your personal data is subject to the University [Records Retention Schedule](#). This schedule sets out the timeframes and reasoning for retaining different categories of personal data We may hold about you. Personal data that relates to the performance of your student contract and interactions with supporting departments across the University, such as Wellbeing Services and Accommodation will generally be retained for 6 years after the end of our relationship with you. This may be longer if you have an appeal, complaint or ongoing matters with the University after you graduate.



Basic records of students that have applied to the University and studied with Us will be kept for longer periods for the purposes of statistical reporting, verifying awards, and for archiving purposes.

If you join our Alumni community, certain personal information will be retained for as long as you continue to be a member, please see <https://www.reading.ac.uk/AlumniAndSupporters/privacy-notices.aspx> for more details.

Please note that We do not retain copies of your coursework after you leave the University, so please ensure that you have retained copies of any work that you wish to keep prior to leaving.

## How we protect your data

Your personal information is stored securely within the University and our staff are trained about the secure handling of personal information. We may also use third party providers to deliver our services, such as externally hosted software or cloud providers. These parties act solely on our explicit instructions and where we do this, We have measures and terms in place with those providers to ensure that they also protect your data.

## Keeping your information up to date

The accuracy of your information is important to us. You can update your information, including your address and contact details, at any time. If you need to update the details We hold about you, or believe We hold inaccurate data please contact Student Services at: [studenthelp@reading.ac.uk](mailto:studenthelp@reading.ac.uk).

## Your rights

Under data protection law you have the right to:

- Withdraw your consent where that is the legal basis of our processing
- Access your personal data that We process
- Rectify inaccuracies in personal data that We hold about you
- Be erased, that is your details to be removed from systems that We use to process your personal data
- Restrict the processing in certain ways
- Obtain a copy of your data in a commonly used electronic form; and
- Object to certain processing of your personal data by us

Please see the ICO website for further information on the above rights:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you would like to exercise your rights, or have any concerns regarding how We have handled your personal information please contact our Data Protection Office at [imps@reading.ac.uk](mailto:imps@reading.ac.uk)

Some rights are dependent on the lawful basis for processing your information. If We have legitimate grounds to not carry out your wishes, these will be explained to you in response to your request.

You also have the right to complain to the Information Commissioner's Office.

## Questions about this notice

If there is anything in this notice that you are unclear about, please contact our Data Protection Officer, on the contact details below, who shall be happy to answer any queries you may have concerning this privacy notice or the way in which We process your personal data.

By mail: The University of Reading, Information Management and Policy Services, Whiteknights House, Whiteknights Road, Shinfield Road, Reading, RG6 6UR.

By email: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)

By phone: 0118 378 8981

Complaints can be referred to the Information Commissioners Office, the independent body who oversee Data Protection compliance in the UK.

<https://ico.org.uk/make-a-complaint/>

## **Changes to this notice**

We keep our privacy notice under regular review to ensure best practice and compliance with the law. This privacy notice was last updated on 18/01/2022.

We may change this privacy notice from time to time. If We make significant changes in the way We treat your personal information We will make this clear on our website and may seek to notify you directly.

## **How to contact us**

If you have any questions about this notice, our University Data Protection Officer can be contacted at:

The University of Reading, Information Management and Policy Services, Whiteknights House, Whiteknights Road, Shinfield, Reading, RG6 6UR

Telephone: 0118 378 8981. Email: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)