

Privacy Notice – Student Data

Introduction

The University of Southampton supports the student lifecycle from enrolment to graduation. We value your privacy and we recognise the need to process the personal information we hold about you (your data) in a fair and lawful manner.

The University is a "Data Controller". This means that we are responsible for deciding how we hold and use your data. This privacy notice is being made available to you because you are enrolling in a programme of study or you are currently undertaking a programme of study with us, at which point or during the period of study you and third parties provide us with information about yourself. Its purpose is to inform you about how and why your personal data will be used, and how long it will usually be retained, by us. It provides you with certain information that must be provided under the General Data Protection Regulation (EU) 2016/679) (GDPR), the UK Data Protection Act 2018, and any other relevant data protection legislation that may apply (together 'Data Protection Legislation'). Our registration number with the Information Commissioner's Office is Z6801020.

Data refers to the information that we hold about you from which either on its own or in combination with other information you can be identified and may include names, contact details, photographs, identification numbers, online identifiers and expressions of opinion about you or indications as to our intentions about you. Categories of data held by the University about students are set out below. Processing means doing anything with your data, such as collecting, recording or holding the data as well as disclosing, destroying or using the data in any way.

This notice may be amended from time to time and you can obtain a current version at <https://www.southampton.ac.uk/studentadmin/student-admin/privacy-notice.page>

Data Protection Principles

We will comply with Data Protection Legislation and its principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Used in a way that is relevant to the purposes we have told you about and limited in usage only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary to achieve the purposes we have told you about.
- Kept securely.

What information does the University collect?

We may collect and process the following categories of personal data about you:
Biographical information such as name, title, birth date, age and gender
Photographs

Your contact details including addresses, email addresses and phone numbers
Contact details of family members or friends
Identification numbers, including your University student ID number, HESA ID, ORCID
Online identifiers (e.g. internet protocol addresses, cookie identifiers)
The previous educational institution(s) you attended and qualifications obtained
Nationality and Domicile
Bank or credit card/debit card details secured using SSL technology
Records of all contact we have with you
Current interests and preferences
Care-leaver, Parental Education and Occupation of student or parent
Work placement or work experience
Financial support including funding sources
Evidence of the Right to Study in the UK including passport and visa information
Disclosure and Barring Service certificate number
Passport information
Records of absence for students sponsored by the University under Tier 4 of the UK's immigration legislation

What if you do not provide your data?

If you fail to provide certain categories of personal data when requested, or allow us to process your personal data collected through other means for specified purposes, we will not be able to successfully process your enrolment and provide you with educational services.

How the University uses your special category data

We may also process the following “special categories” of more sensitive personal data, where this is absolutely necessary:

Disability
Ethnicity
Religious Beliefs
Gender Identification and Sexual Orientation
Medical conditions or allergies if you disclose them to us during an application for Special Considerations or prior to a field trip or study abroad
Criminal convictions, if you are studying for a degree which leads to registration as a nurse or doctor or require a visa or immigration permission to study in the UK

We will only process special category data where you have given your explicit consent, unless we are legally obliged to do so.

We may use your special category data in the following ways:

- To fulfil our legal obligations to provide data to statutory bodies such as the Higher Education Statistics Agency (HESA);
- To ensure that appropriate adjustments are made to enable you to participate in your programme of study;
- To ensure meaningful equal opportunity monitoring and reporting;
- To make decisions about applications for special considerations;
- To ensure that staff accompanying field trips or residential courses are aware of health conditions or allergies;
- To make decisions about your ability to continue on a programme which leads to registration as

a nurse or a doctor if you have a criminal conviction.

Information about criminal convictions

We will collect and use data about any criminal convictions that you may have if you are studying for a degree which leads to registration as a nurse or doctor

Why does the University process your data?

We need to process your data to enrol you in a programme of study in fulfilment of the University's public task in providing educational services.

This data is processed to enable you to:
Enrol at the University, receive your ID card and engage with your studies
Receive appropriate funding from the Student Loans Company, Research Councils or the University
Request an exemption from Council Tax
Receive appropriate certification upon successful completion of studies
Register with a Professional, Statutory or Regulatory Body if applicable depending on your Programme of Study and satisfactory completion
Comply with UK immigration regulation
Register with the Police if required as a condition of your visa
Access learning materials for your modules
Access the University library
Submit assignments online
Engage in online assessment activities related to your programme or modules
Use the University printing facilities
Access University buildings and laboratories related to your Faculty or School
Apply for a parking permit
Use the University Student Portal, SUSSED
Use the University SharePoint site
Participate, if you so agree, in approved market research activities (e.g. surveys, focus groups, workshops) about your University experience, including the National Student Survey
Receive communications about the University community, your studies and your experience as a student
Enter competitions run by the University
Receive an accurate invoice for tuition fees where appropriate
Receive payments from the University for stipends, expense claims, refunds of overpayment etc.
Track the progress of your research programme online
Access your personalised teaching and exam timetables
Engage with clinical and other placements related to your programme
Add your research outputs and other research activities to Pure
Add your research publications to the institutional repository
Study at partner institutions under a collaborative arrangement
Register to vote in Southampton
Raise enquiries and issues, and receive responses, through the University's enquiry management service
Access the University Careers Service
Access services provided by Sport and Wellbeing
Access services provided by Enabling Services
Engage with internships and placements supported by the University
Attend Doctoral Training sessions facilitated by external providers
Access materials held at the British Library and external providers of library materials
Receive support from Foundation Schools if you are a medicine student progressing to the UK Foundation Programme

This data is processed to enable you to:
Apply for and remain in halls accommodation
Receive appropriate treatment in the case of a medical emergency
Be covered by University of Southampton insurance whilst on field trips or residential courses
Continue your relationship with the University of Southampton following your study (further information is available here: https://www.southampton.ac.uk/alumni-supporters/stay-in-touch/privacy-notice.page)

This data is processed to enable us to:
Maintain accurate records related to your study at the University of Southampton
Support you in your studies at the University
Provide you with Transcripts, Diploma Supplements and Certificates showing your qualifications awarded and/or modules studied
Fulfil our legal data reporting obligations to statutory bodies such as the Higher Education Statistics Agency (HESA)
Ensure you receive appropriate funding and are invoiced for the correct tuition fees
Comply with UK immigration legislation
Monitor attendance to ensure that students sponsored by the University under Tier 4 of the UK's immigration legislation are engaging with their studies
Monitor attendance to identify students who may need additional support or pastoral care
Compile records of attendance through the monitoring of doorway access to laboratory and workshop facilities
Register with a Professional, Statutory or Regulatory Body if applicable depending on your Programme
Make payments to your bank account where necessary
Invoice a third party for payment of your tuition fees
Made decisions about applications for special considerations
Review and resolve cases of academic integrity, appeals, complaints, discipline, fitness to practice and fitness to study
Respond to any queries you may have by referring to previous contact records
Provide your Personal Academic Tutor and Module Instructors with your photograph via our Student Systems
Provide additional support, where required, and ensure that any disability you may have is supported through your studies
Provide the emergency services with relevant information to ensure that students receive appropriate treatment
Communicate with you about the University, your student experience and your studies
Contact you about market research activities (e.g. surveys, focus groups, workshops) about your University experience to improve services to students, including via text message
Contact you about competitions run by the University
Provide you with the facilities and systems to support your studies and research
Provide you with information about employment opportunities and the careers support available from the University
Provide you with information about relevant training and development opportunities related to your studies
Provide you with any additional support you may require based on your identified needs
Identify whether you are eligible for internal or external scholarships
Analyse our student population to identify different student groups and provide tailored services to these groups as necessary
Ensure that only students enrolled at the University are in halls accommodation
Provide you with appropriate Doctoral Training sessions and book accommodation for you in Southampton if you are not Southampton based so you can attend these sessions

This data is processed to enable us to:
Send you communications about your use of the library and library services such as placing holds, overdue books
Carry out analysis and develop business intelligence in order to monitor institutional performance, e.g. how we are performing against our institutional goals and performance indicators
Fulfil our legal obligation to respond to Freedom of Information requests. Information will be redacted before disclosure to reduce the risk of any individuals being identifiable from it
Carry out analysis to verify data published about the university such as in newspaper articles or league tables
Provide information and data for publications about the University, which will be redacted to reduce the risk of any individuals being identifiable from it unless you consent to being identified
Provide appropriate insurance for students participating in field trips or residential courses
Ensure that staff accompanying field trips or residential courses are aware of any relevant health conditions or allergies
Contribute to research into medical education if you are studying Medicine
Make decisions about your ability to continue on a programme which leads to registration as a nurse or a doctor if you have a criminal conviction
Develop an ongoing relationship with you after the completion of your studies

Consent

We ask for your consent to share your name, ID, date of birth, term time address and details of your programme with local councils for the purpose of Council Tax exemption. We also ask for your consent to share your University email address with Southampton City Council if you are eligible to register to vote in Southampton.

Right to withdraw consent

You have the right to withdraw your consent to either of the above processing purposes at any time. To withdraw your consent to either activity, please contact studentrecords@soton.ac.uk. Once we have received notification that you have withdrawn your consent for a particular personal data processing activity, we will advise the appropriate Council and update our records to indicate that you no longer consent to sharing this data for such purpose.

Processing for limited purposes

We will only process your data for the specific purpose or purposes that we tell you about, or if specifically permitted by the Data Protection Legislation, and will only process your data to the extent necessary to achieve that specific purpose or purposes.

Accuracy

We always aim to keep your data accurate and up to date. You can amend your contact details via the My Student Record button on SUSSED. Other data that is inaccurate can be amended on your request. Please notify your Student Office if your personal details change or if personal data we hold about you is inaccurate.

How will your data be collected?

We obtain your data either directly from you or indirectly from third party sources with whom you have had direct contact, such as UCAS or reputable international agents. We will always look to ensure that the third party has the lawful authority to share this data with us and has collected it from you fairly.

How will your data be secured?

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. In addition, we limit access to your data to those employees of the University who have a business need-to-know. They will only process your data on our instructions and they are subject to a duty of confidentiality.

Holding and retaining your data

We create and hold your data both electronically and on paper. We will retain your core student record, including personal data, permanently after you have enrolled so that we can identify that you have been a student at the University of Southampton and verify any awards achieved. For more information about the length that we retain certain types of data generally for different purposes in providing educational and research services, please see our Data Retention Schedule at: <https://www.southampton.ac.uk/about/governance/regulations-policies-guidelines.page>

Who has access to your data?

Your data will be shared internally within the University for the purposes of processing your enrolment and providing you with educational services.

Your information will be shared externally for the purposes of processing your enrolment and providing you with educational services.	If you:
The Higher Education Statistics Agency and whoever we will send HESES to in future	Are studying towards a credit bearing programme
Professional, Regulatory or Statutory Bodies	Are studying on a programme leading towards registration with a Professional, Regulatory or Statutory body
UK Visas and Immigration	Are sponsored by the University under Tier 4 of the UK's immigration legislation
The Student Loans Company or appropriate funding body	Have applied for a loan from Student Finance England, Student Finance Northern Ireland, Student Finance Wales or the Student Awards Agency for Scotland
Skills Jersey or Student Finance Guernsey	Have applied for financial support from either body
NHS Business Services Authority	Have applied for an NHS bursary
Third party sponsors	Have indicated that a third party will be paying any sum towards your tuition fees or you have been awarded a scholarship that is funded by a third party
Research Councils, either directly or via Je-S	Have applied for a Studentship to support your Postgraduate Research

Your information will be shared externally for the purposes of processing your enrolment and providing you with educational services.	If you:
The US Government and its authorised agencies, via the National Student Loan Data System	If you are or have been a recipient of, or have ever received US Federal Student Aid
The US Department of Veteran's Affairs	Have received funding under the GI Bill.
IPSOS Mori	If you are a final year undergraduate student so that you can be contacted to participate in the National Student Survey
External Examiners	Are an enrolled student
The Enhanced Learning Credit Administration Services (ELCAS)	Are a member of the Armed Forces and have applied for financial support from ELCAS
Placement and work experience providers	Are undertaking a compulsory placement as part of your programme or any other work experience activity supported by the University
Collaborative institutions	Are studying on a programme partly delivered under a collaborative arrangement with another institution or Are part of a Doctoral Training Partnership or Centre for Doctoral Training that administers post-graduate research programmes or Are undertaking a split site or joint PhD
Local Councils	Have given your consent for us to confirm that you are a student at the University for Council Tax exemption purposes
Southampton City Council	Are eligible to register to vote in the UK and live in the constituencies administered by Southampton City Council's Electoral Services team
Companies who provide Software as a Service or "on-demand" software to the University to support the student lifecycle	Are enrolled as a student at the University of Southampton
Software companies for the purposes of identifying problems with the software	In exceptional circumstances we may need to share your data in order to resolve problems. The data will be destroyed by the software company as soon as the problem has been resolved.
External training providers who are involved in the delivery of your programme or Doctoral training	Are part of a Doctoral Training Partnership or Centre for Doctoral Training that administers post-graduate research programmes
Mentors provided by partnership schools	Studying on a programme that leads to Qualified Teacher Status
Local hotels	Are not based in Southampton but are coming to Southampton to attend Doctoral Training
Southampton University Students Union (SUSU)	Have not opted out of joining SUSU

Your information will be shared externally for the purposes of processing your enrolment and providing you with educational services.	If you:
Companies providing off-site or digital storage	Have left the University of Southampton and the retention period for your student file has not expired
The Office of the Independent Adjudicator	Have raised a complaint with the Office of the Independent Adjudicator and they have requested details related to your academic appeals and/or student complaints.
Appropriate external professional as defined in University procedures relating to Appeals, Complaints, Discipline, Fitness to Practise or Fitness to Study	Have raised an Appeal or Complaint or are under review for Discipline, Fitness to Practise or Fitness to Study
Thunderer Squadron	Are sponsored by the Defence Academy
British Library or other libraries providing inter-library loans	Have requested material not held in the University of Southampton Library
Other libraries	Have requested access to the library under SCONUL or other reciprocal schemes
Companies who carry out market research or analysis on behalf of the university	Are in the group of students appropriate to the project.
Companies who develop business intelligence tools for the University	Are enrolled as a student at the University of Southampton. Anonymisation processes will be applied to your data pre-disclosure to reduce the risk of personal identifiability, and subsequently destroyed by the external company as soon as the tools are completed.
The Office for Fair Access	Are an undergraduate student paying Home/EU fees
Other third parties as requested	Ask us for a reference and consent to us providing the same
Private hall providers that the University has agreements with for provision of student accommodation	Have applied for halls accommodation and been allocated to a private provider with whom we have an agreement
The UK Clinical Aptitude Test Consortium	Are studying for an undergraduate degree in Medicine
Emergency Services	Are receiving emergency treatment

All third-party data recipients are required to take appropriate security measures to protect your data in line with our policies. We do not allow our third-party data recipients to use your personal data for their own purposes unless they have been approved by us as lawful in compliance with Data Protection Legislation. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Exceptionally, we may disclose your data with a third party if required to do so: to protect or defend the University's rights, interests, or property, or those of third parties; act in urgent circumstances to protect the personal safety of University constituents, or the public; or protect against legal liability.

Publication of examination results on the Internet, and disclosure of personal information relating to overseas and sponsored students and exchange and collaborative programmes, among others, may involve a transfer of personal information to a country outside of the European Economic Area. In each case, whenever we transfer your personal information out of the EEA, the University will

endeavour to ensure a similar degree of data protection is afforded to it in the recipient country by implementing appropriate safeguards.

The University also reserves the right to release appropriate and relevant information to your parent, guardian or sponsor to protect your vital interests (life and death issues) or the vital interests of a third party, or to ensure or facilitate payment of any fees due to the University.

Automated decision making and profiling

None of the data collected about you will be used as part of any automated decision making process, or to build a profile of you.

Your rights

You have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data. Please amend your contact details via the My Student Record button on SUSSED or notify your Student Office ;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing your data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise these rights please use our [online form](#) or write to:

The Data Protection Officer
Legal Services
University of Southampton, Highfield
Southampton, SO171BJ
Email: data.protection@soton.ac.uk

Further information

We also have additional policies and guidelines concerning particular activities. If you would like further information, please see our Publication Scheme at:

http://www.southampton.ac.uk/about/governance/regulations-policies-guidelines.page#publication_scheme.

If you are unhappy with the way that we have handled your data you can contact us at:

Student and Academic Administration
B37/2035, Highfield Campus, Southampton SO17 1BJ UK.
Email: studentrecords@soton.ac.uk
Telephone: +44(0)23 8059 5000

Alternatively, you can contact the UK Information Commissioner's Office. See their website at: <https://ico.org.uk/>. We would, however, appreciate the chance to deal with your concerns before you

approach the ICO so please do contact us in the first instance at studentrecords@soton.ac.uk