BU Privacy Notice: Students

Please click on the links below to see the information in each section of this Privacy Notice. Each link opens a new page.

In section 4, 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, the paragraphs marked “More information” provide further information about how and why the processing is undertaken and a full reference to the legal basis for it.

Alternatively you can access a printable PDF copy of the full Privacy Notice by clicking on the link on the right of this page.

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 BH12 5BB.

From time to time we will make changes to this Notice. Significant changes 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.

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1. **Introduction**

(a) **What is this Notice?**

This Notice covers information relating to BU Students. This includes any person who has firmly accepted an offer to study at BU, as well as those who are already registered on BU courses. 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 may wish to 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. These can all 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 our uses of your data. In addition the data protection laws require us to be transparent about how we process your data, and they set legal requirements to give you specific information.

Because of this, 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 and it contains some technical legal language. We have tried to make the Notice as clear as possible and provide useful 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 privacy, 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 where it meets certain requirements or conditions which relate to the purpose of the processing and how it is carried out.

**More information:** Previously the data protection laws were set out in the Data Protection Act 1998, but from 25 May 2018 new data protection laws apply. These are set out in the EU General Data Protection Regulation (called “GDPR”) and a new UK law, the Data Protection Act 2018.

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.

In particular 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; and
- Keep your data secure.

Information about your data protection rights as a data subject 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, against each description of a data processing or sharing activity you will automatically 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 include any specific processing activities which we particularly need to highlight to you. You can then choose whether to click through to see 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 always be obtained by clicking through the links 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 [relating to your employment at BU /for the delivery of your course] or an additional contract for other services[relating to your employment at BU or an additional contract between you and BU]. The terms of the BU Student Agreement can be found here: [link] [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 would usually be an activity within BU’s core purpose as a statutory higher education corporation, to deliver higher education and carry out research, but might 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. Consent can be withdrawn by contacting [insert] [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 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 and subsequently through the work you undertake on your course and 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 and organisations which provide work placements and (where relevant) UK Visa & 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;
  - we process information about your personal characteristics (gender, ethnicity, disability, sexual orientation, religion) 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 mitigating 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;
Where you need a visa to study in the UK, we will need to process information about your immigration status in order to fulfil our responsibilities as a visa sponsor under immigration legislation.

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);
  - Certain criminal convictions and other information provided in DBS checks, where this is relevant to admissions decisions or risk management arrangements; and
  - Information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation, which is used for equal opportunities monitoring and other 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 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 mitigating circumstances; any student disciplinary matters; and information about any additional support needs you may have. Information in SITS is accessed by BU staff to the extent that they require access for the purposes of their role within BU and fulfil our contract with you.

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 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 and MyCareerHub.

Again, BU staff are under an obligation 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

The sections below refer to different types or purposes of data processing.

In 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, the paragraphs marked “More information” provide further information about how and why the processing is undertaken and a full reference to the legal basis for it.

Course Delivery & Education Services

Student Support, Wellbeing & Risk Assessment

Accommodation, Campus Facilities & Additional Student Services

Organisational Development & Reporting

Communications

Administration, Compliance & Systems

After you finish your BU course
• **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 progression and your academic performance.  

- Information about your attendance at classes or contact with your research supervisors
- Information about your academic progression and performance
- Your submitted assignments and examination papers
- Appraisals or assessments of and comments on your work, including marks and grades awarded
- Details of examinations taken, your predicted and actual examination 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 ensure that you are able to access all relevant elements of our core teaching, learning and research services in accordance with the BU Student Agreement, and 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.

**More information:** This processing is necessary to enable you to develop and progress academically with a view to obtaining the academic standard required to achieve the degree qualification associated with your course.

- 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

• **Management of teaching quality and academic standards.**

This includes processing your feedback on your study experience (sometimes using online survey tools such as Bristol Online Surveys or Survey Monkey) and sharing your data with external examiners.

BU 0010759.607037.1
More information: Within our core teaching, learning and support services we use your data to ensure that we maintain appropriate academic standards. In particular:

- We will ask you to provide feedback on or evaluations of your study experience at BU, including specific courses or modules you are undertaking. This information will often 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 Bristol Online Surveys or Survey Monkey: if this is the case, the survey tool provider will also provide you with a privacy notice about their processing of data. We use your information 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. 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 feedback will not affect any other decisions or actions relating to you. We are working on our arrangements for student feedback with a view to reducing the extent to which this involves processing of personal data.

- 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).

- Managing procedures relating to academic appeals, complaints and offences.
This includes sharing your data with the Office of the Independent Adjudicator for Higher Education (OIA) if you decide to refer any matter to the OIA and with organisations operating anti-plagiarism software on our behalf (e.g. Turnitin®).

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 relating to any aspect of your course, or if there is a concern that you may have committed an academic offence, we will process your data as necessary to apply BU’s policies and procedures in relation to these matters and the BU Student Agreement. This includes processing 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 process this information within the relevant Faculty and within our Academic Services team. We will share your information with senior staff within BU’s Students Union (SUBU), where they are involved in determining complaints or appeals as provided for in our processes.

If relevant to any allegations about you, we may share your personal data with organisations operating anti-plagiarism software on our behalf (such as Turnitin®), for further details see our Turnitin® UK Information for Students (pdf 26kb) guidance.

☀ Necessary for the performance of the contract between you and BU

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

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 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 mitigation/special consideration**

  We process information about requests from students for consideration of mitigating 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 access to learning and teaching resources, personal and professional development resources for postgraduate researchers, provision of teaching and learning support through communications between students and BU staff, submission of assignments, receipt 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 responsibilities within their role 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

- **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 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 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 books that you borrow and will send you messages to advise you when books 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

- **Bursaries, scholarships/studentships and hardship 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 or scholarship/studentship or your eligibility for hardship funding support. Where a bursary or scholarship/studentship 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. In relation to hardship 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 hardship funding or other financial support, with your agreement we will 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.
  - 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 and information about your course at BU and 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.

- **Professional and regulatory bodies**

  Where your course is intended to lead or contribute to meeting the requirements for registration with a professional body, we will share your data with the relevant professional body as necessary in relation to the confirmation of qualifications, professional registration, professional conduct requirements and processes 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.

  **More information:**

  - 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

**Student Support, Wellbeing & Risk Assessment**

- **General**

  This covers general processing for support wellbeing or risk assessment purposes, in addition to similar processing for specific purposes in the sections below, where these are relevant to your course or where you access specific support services from BU.

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

  BU staff will process information about your personal and family circumstances, academic and extra-curricular interests or 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, 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 information in the context of our Global Talent Programme: further information about this will be provided if you become involved in this Programme.

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This will include processing 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.

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.

We will process information about any criminal convictions you have and which you notify to us during the admissions process or subsequently. We use this information to carry out risk assessments to identify any significant difficulties which you may experience in completing or using your BU qualification as a result of the conviction, to identify any potential risks to others which would arise from you continuing to study at BU and to consider 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

- Additional Learning Support

If you have an additional learning support need, you can access a range of support services through BU’s Additional Learning Support (ALS) team. With your agreement we will process your personal data, including information about relevant health conditions or disabilities, for the purposes of providing this service. At least some information about your support needs
will need to be shared with BU staff involved in managing and delivering your course, to enable appropriate support to be provided. There is some data sharing between ALS and our Accommodation Services team to enable allocation of appropriate accommodation and/or support to students with disabilities and health conditions. Further information about this processing is provided if you register to use Accommodation Services.

**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 ALS service. Where we have identified needs for additional support and arrangements for this support have been put in place, this will usually be recorded in SITS (your student record) to ensure that your needs are understood and met throughout your period of study at BU.

- **Consent:** you have agreed to this processing

- **Occupational Health**

Where your course requires you to undertake work placements within healthcare settings, it is necessary for you to undergo an occupational health assessment 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. This applies to professional healthcare programmes of study within our Faculty of Health and Social Sciences. Your personal data will be shared with the University’s supplier of student occupational health services (currently Southampton University Hospitals 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

- **Student Wellbeing service**

  This service provides counselling and other support in respect of wellbeing issues and mental health. 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

- **Criminal convictions information and Disclosure & Barring Service**

  If you are following a course which leads to entry to a regulated profession which is exempt from the Rehabilitation of Offenders Act 1974, either BU (for direct applications) or UCAS will have asked you to declare at the application stage whether you have any spent or unspent criminal convictions that would not be filtered from an Enhanced DBS check. This information will have been used to carry out appropriate risk assessments and consider whether you will be able to meet the requirements of the course and any associated professional registration requirements. This would apply to certain healthcare-professions courses in the Faculty of Health and Social Science. Before commencing study on these courses you will also have to undergo an Enhanced DBS check conducted by the Disclosure & Barring Service. This will identify convictions and cautions on your record. The results of these checks will be shared with BU.

  For other applications, either BU or UCAS may have asked you to declare at the application stage whether you have any relevant unspent criminal convictions. “Relevant” is likely to
include one or more of the following: any kind of violence including threatening behaviour, offences concerning the intention to harm or offences which resulted in actual bodily harm, sexual offences, including those listed in the Sexual Offences Act 2003, unlawful supply of controlled drugs or substances where the conviction concerns commercial drug dealing or trafficking, offences involving firearms, offences involving arson and offences involving terrorism.

This information is processed initially and then further held by us for the purposes of risk assessment in relation to your potential admission to BU and your access to certain services such as Accommodation Services. For these purposes we may also ask you for further information about the conviction and related matters. Further information about how we process this information is set out in our Criminal Convictions Procedure: https://www1.bournemouth.ac.uk/students/help-advice/important-information.

Students on any course undertaking work placements that will bring them into unsupervised contact with children or vulnerable adults will need to undertake a DBS check before they can commence their placement.

The legal basis for processing criminal convictions data in the data protection legislation is set out separately from the basis for processing special category data. The legal basis is under review and this Notice (and associated policies/practices) will be reviewed and updated shortly. At present we process this data on the basis that it is in the substantial public interest and necessary for the purposes of safeguarding under-18 students and other vulnerable students within our community.

- **Immigration support**

  BU’s student services team 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, workshops 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.

**Accommodation, Campus Facilities and Additional Student Services**

- **Accommodation**

  Your data will be processed by our Accommodation Services team where you choose to apply for certain categories of student accommodation or use other accommodation services provided by BU.
o BU-allocated student residence accommodation

BU facilitates booking of places in certain student residences (provided by either BU or by third party providers) through the BU Accommodation Portal. BU carries out some allocation of accommodation to those with specific needs such as relevant health conditions or disabilities. Where you register to use the Portal you will be given separate privacy information about the way in which the personal data provided through the booking process will be processed within BU and shared between BU and third parties.

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:

o Operation of CCTV systems. Data generated through the operation of these systems will in certain circumstances be shared with the police.

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 policies 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. 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.
- Management of car parks and provision of parking permits. This includes sharing data with the third party provider of parking enforcement services (Britannia Parking).

Your data is processed within BU when we process any application you make for a BU parking permit. A third party provider (currently Britannia Parking Ltd) carries out monitoring and enforcement of the terms and conditions of use of BU car parks [link]. 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. In the future we will use student data to develop more sophisticated approaches to timetabling of classes. This will involve processing student names, ID numbers, contact details and module choices to produce individual student timetable information.

- 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
  - 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 SportBUservices 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.

**Organisational Development & Reporting**

- **Internal analysis and reporting**

We use information about you, your academic performance and progression and your feedback on your BU student experience to carry out analysis which is used to improve BU’s provision of higher education and carry out equal opportunities monitoring to inform our work to widen participation in higher education at BU. This includes processing of data we receive in your application to BU about your ethnicity and your socio-economic background (including whether you are a care-leaver). It will also include any information you have given us about your health conditions or disabilities, or your gender status, sexual orientation and religion or equivalent beliefs. This information is used only for analysis and reporting purposes: it is not used to take any decisions or actions in relation to you as an individual.

**More information:** We carry out a wide range of analysis and internal reporting to inform internal BU discussions and decisions aimed at:

- improving the quality and effectiveness of our higher education provision and increasing our ability to meet the expectations and needs of students/potential students and future employers; and
widening access to/participation in our higher education provision by all groups within society. Monitoring equality of opportunity and progress in widening participation is required by the higher education regulator, the Office for Students, and by the Equality Act 2010.

For these purposes we use data about your academic performance and progression which is generated through your study at BU and contained in your student record. We also use data about your personal characteristics which you provide when applying for admission to BU or when you register as a student with us. The statistical analysis we create is carried out primarily by data analysts in our Academic Services team and is presented in a format which does not identify you as individuals. The data about your personal characteristics is used only to create this statistical analysis. The personal characteristics data and the statistical analysis are not used to take any decisions or actions in relation to you as an individual.

Reports on this statistical analysis are shared internally 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 and Faculties to drive improvements within 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: this is equal opportunities monitoring
- Necessary for research or statistical purposes

**BU surveys**

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. 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. The results will be processed for analysis and statistical purposes, including equal opportunities monitoring, widening participation and improving BU’s administration, course delivery and services.

- 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.
• **External analysis and reporting generally**

We will also use your data to produce analysis and reports as requested or required by external bodies and for other external reporting purposes. The analysis and associated reports or commentary which we produce will not include your data at an individual level or in an identifiable format. The data processed for these purposes includes data we receive in your application to BU about your ethnicity and your socio-economic background (including whether you are a care-leaver). It will also include any information you have given us about your health conditions or disabilities, or your gender status, sexual orientation and religion or equivalent beliefs. This information is used only for analysis purposes: it is not used to take any decisions or actions in relation to you as an individual.

**More information:** BU is required to make a range of reports to the Office for Students (the higher education regulator). These include reporting on BU’s actions for the purposes of widening participation as well as to enable analysis of 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. Personal data is processed by BU to produce this reporting information, but the reports do not include personal data i.e. data at an individual, identifiable level.

• **Providing information to HESA and national survey providers**

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](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.

- 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,

In addition to the annual data report to HESA, we also 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.

  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 survey currently called the Graduate Outcomes Survey.

  This is a survey about the job/career outcomes for higher education graduates. After you leave BU you may be contacted and asked questions as part of this survey.

If you are contacted for these purposes you will be given further privacy information at that point.

With your agreement you may also participate in other external surveys relating to our higher education provision, such as the Postgraduate Taught Experience Survey. or the Postgraduate Research Experience Survey, both of which are operated by Advance HE.
Participation is voluntary: you will be asked for your consent to the use of your personal data for these purposes, on the basis of information provided about the scope of the personal data you are providing and how it will be used.

🌟 Consent: you have agreed to this processing
Communications & Surveys

- **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 wellbeing support and disciplinary action.

We use your BU email address to send you frequent communications about matters relevant to your course or accommodation (if you are resident in BU-allocated 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). If you have provided us with an alternative email address, we may use this as well as your BU email address. We will not use your email address to send you direct marketing communications unless you specifically consent to receive marketing emails of a particular type.

**More information**: This processing ensures that you are able to access all elements of your course in accordance with our commitments under the BU Student Agreement. This includes 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 through your position as a BU student.

If you are resident in accommodation booked through BU Accommodation Services, you will receive information about ResLife 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

Administration, Compliance & Systems

- Finance

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. This will include processing of information about your nationality, country of residence and immigration status, where this is relevant to determining the level of course fees that you need to pay and your funding source (if any). If you obtain funding from the Student Loans Company, we will share some of your data with them.

For all students, we process information about your nationality, country of residence and immigration status to determine your fee status, i.e. whether you are a UK, EU or overseas student and the level of fees you are required to pay under the BU Student Agreement on the basis of this status. 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 funding from the Student Loans Company, we share information about your course, progression and attendance/registration, your fees status and your payment status with the Student Loans Company 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.

- **Necessary for the performance of the contract between us**

- **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 hardship funding

We process your data as necessary to make payment of any scholarships, bursaries or hardship 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 Sedexo to enable payment by VISA pre-payment card to enable Sedexo to meet banking regulation requirements to “know your client”.

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 or if you make a complaint under the Student Complaints process, we will process your data as required to apply the relevant processes. This will include sharing your data with any individuals who are the subject of any complaints, with those required to take decisions about your complaints or any disciplinary allegation against you and (possibly) with the Office of the Independent Adjudicator for Higher Education (OIA) if you decide to refer any matter to the OIA.
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. compliance with the OIA process

**Immigration Compliance**

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 visa and to comply with our legal obligations under our Tier 4 visa sponsor licence. This may have included sharing your data with UK Visas and Immigration (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 UK Visas and Immigration 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.

We are required to retain some information collected for the purposes of our position as a Tier 4 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 document retention guidance for Tier 4 Sponsors which is issued by UK Visa and Immigration.

More information:
Necessary for compliance with a legal obligation on BU: our obligations as a Tier 4 sponsor/licence holder under the immigration legislation

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.

• IT services and systems

We process your data in the course of providing and maintaining the IT systems 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 system used for student records. 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.

- **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. Your data will be processed by BU staff for the purposes of 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.

- 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. operating and improving IT systems appropriate to the work of the organisation

After you finish your studies at BU

- Graduation

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

More information: We publish this information in the graduation ceremony booklet which is available to everyone attending a BU graduation ceremony. These details will also be published on our archive and our website following the relevant graduation events.

When you register online to attend the award ceremony or choose to graduate in absentia 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. If you have any concerns about being filmed in this way, please read the section above regarding use of images and contact us using contact details in the communications you’ve received about Graduation.
After Graduation

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

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.

We may contact you to conduct surveys about your student experience at BU as described above.

Except where exceptional circumstances apply, postgraduate research students are required to deposit a copy of their thesis with the BU Library Service. This is then available to registered users of the library and details of the thesis are set out in the online library catalogue.

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 [link] for information about how and why we use this data after you leave BU.

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 party organisations where this is not covered in section 4.
Students Union (SUBU)

All BU students are eligible for membership of the Bournemouth University Students Union (SUBU). If you decide to 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.

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 your name, details of your course [type and level of course], [ ] and [ ] with SUBU. This is to facilitate the administration of SUBU, by helping them to contact you and complete your registration as a SUBU member. 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 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.

Local authorities: Council Tax and electoral purposes

We provide your name and course details to Bournemouth Borough Council and Poole Borough Council to enable them to manage and apply the Council Tax exemption which applies to properties solely occupied by students.

In December each year we provide each local authority 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. In addition, throughout the year BU provides the Council with monthly update lists of students who have withdrawn from their courses. This enables the Councils to ensure that they correctly apply the Council Tax exemption for properties solely occupied by students. The data is provided under formal agreements which prevent the Councils from using the data for any other purpose.

We also provide data to the same local authorities to enable them to manage the Electoral Register. For use in connection with these purposes only, we provide your student
reference number, name, date of birth, nationality, home address, any other contact address and your BU email address.

More information:

- Necessary for tasks in the public interest: the local authorities’ public tasks in relation to Council Tax and management of the electoral register

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

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 a local authority (this will usually be either Bournemouth Borough Council or Poole Borough 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 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 more specific references to retention periods for different categories of data.

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 [link] 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/](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