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RECORD OF PROCESSING: STUDENT DATA

Record Retention Periods: please see the University's Record and Document Retention Schedule <https://www.worcester.ac.uk/informationassurance/records-management.html>

Description of record/purpose data processed	About who	Where does the data come from	Why are we processing it?	What is our lawful basis for processing the data? (Article 6)	Is any of the data likely to be classed as special category data?	Additional lawful basis of processing special category data (Article 9)	Who do we share the data with?	Why do we share the data?	Is the data transferred to another country?	If yes, which country
Core Student Data										
Name and contact details, Date of birth - current student - core student data	prospective/current student	Student, updated on annual registration	We process this information as part of the core student record to enable the student's educational contract	Necessary for the University to perform our educational contract with students(Article 6(1)(b)); Processing is necessary for the purposes of the legitimate interests of the University and other individuals, except where overridden by data protection rights and freedoms (Article 6(1)(f))in relation to sharing of data with the Students' Union	no		Internally and externally with various statutory bodies and funders (detailed below) and the Students' Union (students may choose to opt out of their data being shared with the SU); Worcestershire County Council in relation to membership of the Hive	To provide your educational contract and to comply with statutory regulations	no	
Previous qualifications and education	prospective/current student	Provided as part of the application process either via UCAS or by applicant	We process this data as part of the application process and for statistical returns	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c)	no		Internally and externally with various statutory bodies and funders (detailed below)	To provide the educational contract	no	
Special category data - ethnicity, disability, nationality, religion	prospective/current student	Applicant/student is asked to provide during application process and again during annual registration process	We process this data in order to comply with equal opportunity and widening participation requirements. Disability data allows us to put in place additional adjustments	Explicit consent (Article 6(1)(a)	yes	Explicit consent (Article 9(2)(a)	Internally to enable additional adjustment to be made. Externally on statistical returns	To make additional adjustments and to comply with Equal Opportunity reporting requirements	no	
Next of kin	Current student	Provided by the student	To enable us to contact in case of an emergency	Processing is necessary for the purposes of the legitimate interests of the University and other individuals, except where overridden by data protection rights and freedoms (Article 6(1)(f))- it is necessary for the University to have emergency contact details/next of kin details	no		Stored in student electronic system (SITs) only shared in an emergency	In the case of an emergency	no	
Academic marks, results and progress for assessments, exam board results, published pass lists, annual progress, credits achieved - Core student data	Current student	produced by the University	We process this information as part of the core student record to facilitate the students educational contract and ensure they are progressing through their course	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		University staff primarily in Registry Services and the relevant Academic department	To verify the data and ensure that the student is progressing through their course		
Data returns to regulatory bodies	Current student/graduate	produced by the University	The University is required to provide data annually to a range of regulatory bodies depending on the course the student is studying. Once a student has graduated the University is required to pass on the student's contact details to HESA so they can complete the Graduate Outcomes Survey	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		HESA (All students), NCTL (PGCE and undergraduate ITT students), Health Education West Midlands (HEWM)(Nursing and Midwifery students), Pearson	We have a statutory obligation to provide this data	no	
Registration of students with third parties	Current student	produced by the University	The University is required to provide data for some groups of students in order for them to register with relevant accreditation bodies	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		Pearson (HND & HNC students)	In order for students qualifications to be accredited	no	
Change of circumstances data to SLC	Current student	produced by the University	Notification to the SLC of any changes to a students course fees, or withdrawal or temporary withdrawal from their course. This allows the SLC to ensure the student's funding is correct	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c)	no		Student Loan Company	To ensure the student's funding is correct	no	
Confirmation of eligibility for bursary to appropriate regulatory professional bodies for relevant courses AND Confirmation of award upon completion of course	Current student	produced by the University	Confirmation of award of qualification is provided to the relevant regulatory body for students who are eligible for a bursary	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c)	no		NHS (Nursing & Social Work), Health and Care professions (HCPC)(Psyiotherapy, Occupational Therapy, Social Work and Non-medical Prescribing modules), General Pharmaceutical Council (GPhc)(Pharmacy related courses), Nursing and Midwifery Council (NMC)(Non-medical prescribing modules), Royal College of Occupational Therapists (RCOT)(Occupational Therapy students), NCTL/DfE (ITE programmes)	Data provided to regulatory bodies in order to confirm eligibility of student for bursary/funding award	no	

Reference requests and confirmation of awards	current student/graduate	produced by the University	In response to requests where a student has provided the University as a referee	Processing is necessary for the purposes of the legitimate interests of the University and other individuals, except where overridden by data protection rights and freedoms (Article 6(1)(f)). The University has a legitimate interest when receiving a reference request made on behalf of the data subject to process that request.	no			In response to a request for a reference where the student/graduate has put the University as a referee	yes	There may be times when the reference is requested by an organisation outside of the EEA
UKVI Visa	prospective/current student	produced by the University	In order to ensure that the visa is current	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c)	no		UKVI	In order to ensure that the visa is valid	no	
Provision of student data to regulatory bodies for statistical returns and surveys (OFS, NSS, DHLE)	Current student/graduate	Provided by the University	In order to comply with regulatory requirements from funding bodies and government	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c)	no		OFS, NSS, DHLE	In legal and regulatory requirements	no	
Applicant data										
UCAS scan data	prospective student	Student	In order to record attendance at applicant events	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		Internally	In order to record attendance at applicant events	no	
Applicant data (including EU and overseas)	prospective student	UCAS or from the applicant	In order to process application	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no	N/A	Internally	In order to evaluate an application	no	
Interview information	prospective student	Admissions tutors, Registry staff	In order to process application	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		Internally	In order to evaluate an application		
Occupational Health Assessment (for some courses e.g. Nursing)	prospective student	Prospective student	In order to ensure that the student is fit to practice.	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		SOMA (Occupational Health provider) - the student provides the data direct to SOMA, therefore the University does not hold the special category data	SOMA provide the University with an assessment of fitness to practice where this is required for particular courses (e.g. Nursing)	no	
Criminal records data (DBS certificate) - required for some courses or specific modules	prospective/current student	Student	Where relevant we need to review an individual's criminal record before they are able to attend certain placements (e.g. working with children)	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c)	no		The DBS certificate number is retained on the student file; the certificate details are not retained by the University	N/A		
Criminal records data (Declaration of Offences form)	prospective student	prospective student	In order to process application	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c)	yes	Processing is necessary for carrying out obligations or exercising rights or obligations in employment or social security/protection as authorised by UK laws (Article 9(2)(b)) in relation to work placements	Internally on a restricted basis as part of admissions process	In order to evaluate an application	no	
Recognition of Prior Learning Data	Prospective student	Prospective student	In order to process application	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		Internally on a restricted basis as part of admissions process	In order to evaluate an application	no	
Academic Records										
Records of personal academic tutor meetings	student	student and staff	In order to support the student's academic progress	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		Internally within academic team	In order to support the student's academic progress	no	
Assignments	Student	Student and University	Paper copies of assignments held until collected by students after marking	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		N/A	Waiting collection by student	no	
Assessments and dissertations	Student	Student and University	In order to assess the student's academic progress	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		In some cases External Examiners	In order to moderate marks and ensure consistency	no	
Assessment feedback and moderation reports	student	Academic department	In order to support the students academic progress and to process degree results	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		Internally between relevant staff	In order to support the students academic progress and to process degree results		
Fitness to practice data	Student	Student and University	In order to inform a response to a Fitness to Practice case	Necessary for the University to perform our educational contract with students (Article 6(1)(b); processing is necessary for the University to meet its legal obligations (Article 6(1)(c) in relation to the requirements of professional bodies	yes	Explicit Consent (Article 9(2)(a)	Internally and with external panel members and with the OIA should a student raise the matter with the OIA	In order to inform response to case	no	
Academic Misconduct cases	student	Student and University	In order to inform a response to the Academic Integrity case	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	no		Internally and with the OIA should a student raise the matter with the OIA	In order to inform a response to the case	no	
Mitigating circumstances claims and data	Student	University and student	In order to inform a response to the Mitigating Circumstances claim	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	yes	Explicit Consent (Article 9(2)(a)	Internally with relevant staff	In order to inform response to claim	no	

Academic appeals	student	Student and University	In order to inform response to appeal	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	no		Internally between relevant staff and with the OIA should the student raise the matter with the OIA	In order to inform response to appeal	no	
Student complaints	student	Student	In order to inform response to complaint	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	yes	Explicit Consent (Article 9(2)(a))	Internally between relevant staff and with the OIA should the student raise the matter with the OIA	In order to inform response to complaint	no	
Departmental/course marking sheets	student	University and student	In order to assess student's academic progress	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	no		Internally between relevant staff	In order to assess student's academic progress	no	
Academic awards and prizes	Student	University	In order to process awards and prizes gained by student	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	no		Internally between relevant staff	In order to reward achieving students	no	
Scholarship application records	Student	University and student	In order to process the scholarship application	Explicit consent (Article 6(1)(a))	no		Internally between relevant staff	In order to process the application	no	
Extra-curricular award records (e.g. Fitness Instructor award, Sports Coaching award)	Student	University and student	In order to process the award of the qualification	Necessary for the University to perform our educational contract with students (Article 6(1)(b)) and contract with awarding professional bodies	no		Internally between relevant staff	In order to process the award	no	
Student placements - name, contact details, course, any special requirements	Student	University and student	In order to facilitate placement for students on relevant courses	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	no		Internally and externally with placement provider	In order to facilitate placement	no	
Student elective placements overseas - names, copy of passport/visa, health clearance	Student	University and student	In order to facilitate overseas placement for students on relevant courses	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	yes	Explicit Consent (Article 9(2)(a))	Internally and externally with placement provider	In order to facilitate placement	yes	depending on where the overseas placement is located
Course and field trips - student names, medical and passport information	Student	University and student	In order to have a record of who is attending trip in case of accident	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	yes	Explicit Consent (Article 9(2)(a))	Internally between relevant staff	In case of accident	no	
Class registers for some courses/modules	Student	Student	In order to monitor student absence	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	no		Internally between relevant staff	In order to track student attendance on some courses/modules	No	
Course representatives database	Student	Student	In order to administer course committees	Explicit consent (Article 6(1)(a))	no		Internally between relevant staff		no	
Course and other email distribution lists - student UW emails	Student	University	In order to communicate with students e.g. class cancellation, field trips	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	No		N/A	N/A	No	
Module evaluation	Student	University and student	In order to evaluate modules	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	No		Internally	To evaluate modules	no	
Statistical data relating to retention and achievement	Student	produced by the University	In order to analysis key trends in the student body (final reports are anonymised)	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	yes	The data is anonymised				
Student Support										
Student data in relation to Counselling and Mental Health support	Student	University and student	In order to provide the student with relevant support and comply with standards of professional associations	Explicit consent (Article 6(1)(a))	Yes	Explicit Consent (Article 9(2)(a))	The data is not shared outside of the Counselling service without the student's explicit consent	N/A	No	
Student data relating to disability support	Student	University and student	In order to ensure that correct support is offered and to comply with standards of professional associations	Explicit consent (Article 6(1)(a))	Yes	Explicit Consent (Article 9(2)(a))	The data is not shared outside of the Service without the student's explicit consent	N/A	No	
Student Contact records (Firstpoint)	Student	University and student	In order to track and record student enquiries to Firstpoint	Necessary for the University to perform our educational contract with students	Yes	Explicit Consent (Article 9(2)(a))	Retained within service	N/A	No	
Student data in relation to Money Advice	Student	University and student	In order to provide advice to students and process applications to the Access to Learning	Explicit consent (Article 6(1)(a))	Yes	Explicit Consent (Article 9(2)(a))	Internally within the service and limited data with Finance when awards are made	In order to facilitate the payment of awards	No	
Student workshops (run by Student Services)	Student	University and student	In order to facilitate the running of workshops	Necessary for the University to perform our educational contract with students	No		Retained within service	N/A	No	
Student records relating to Student Support and Wellbeing	Student	University and student	In order to ensure students are supported	Explicit consent (Article 6(1)(a))	No		Retained within service	N/A	No	
Student data and records in relation to Careers and Employability service	Student/graduate	University and student	In order to provide students with appropriate advice and support	Necessary for the University to perform our educational contract with students (Article 6(1)(b)); Necessary for the legitimate interests pursued by the University in providing careers support to graduates (Article 6(1)(e))	No		Retained within service	N/A	No	
Study skill appointments and information	Student	University and student	In order to support the student's academic progression	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	No		Retained within service	N/A	No	
Research										
Contracts for research degree students	Student	University and student	Clarifies the rights and obligations of the student	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	No		Internally between relevant staff	To maintain the student record	no	
Contracts for funded research (in relation to PhD studentship)	Student	University, student and funder	In order to process the studentship	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	No		Internally and externally with funder	To process the research studentship and research contract	Yes	Dependent on whether funding is from overseas
Applications for ethical approval (relevant to all students)	Student	University and student	In order to provide ethical approval for research projects	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	No		Internally	To assess the application for ethical approval	No	
Student Ambassadors (generally treated as staff - see Staff Record of Processing)										
Student Ambassador list of contact details	Student	University	In order to contact student ambassadors to offer work opportunities	Necessary for the University to perform our educational contract with students (Article 6(1)(b))	No		Internally	In order to provide work opportunities	No	
In relation to the Campus and University resources										
(For records relating to the use of the Gym, Spors Centre, Arena and McClelland please see the Visitors Privacy Notice)										

Student Accommodation licences	Student	University and student	In order to facilitate the provision of student accommodation	Necessary for the University to deliver its accommodation contract with students (Article 6(1)(b))	No		Internally as necessary i.e. with Finance, Security	In order to allow for the administration of the accommodation contract	No	
Accident reports	Relevant Students	Student/Health and Safety Officer	To record health and safety issues	Necessary for the performance of the contract between the University and the student (Article 6(1)(b)) Necessary for compliance with a legal obligation (Article 6(1)(c) -health and safety obligations	Yes	Processing is necessary for carrying out obligations or exercising rights or obligations in employment or social security/protection as authorised by UK laws (Article 9(2)(9b))	N/A	N/A	No	N/A
Reports of complaints and security incidents relating to student behaviour on and off campus	Student	University, police, students, public	In order to manage incidents involving students and to respond appropriately	Necessary for the University to perform our educational contract with students (Article 6(1)(b); necessary for the University to comply with legal obligations (Article 6(1)(c) - Criminal Law	Yes	Explicit Consent (Article 9(2)(a)	Internally and in some cases with the police	In order to manage incidents involving students	no	
Student Behaviour Review Board	Student	University and student	In order to manage incidents that occur in halls To manage car parking on the University's campus and to provide anonymous data on travel distances	Necessary for the University to deliver its accommodation contract with students (Article 6(1)(b))	no		Internally	In order to manage incidents involving students		
Car Parking Permits	Student	Student		Explicit Consent (Article 6(1)(a) Necessary for the University to perform our educational and accommodation contracts with students (Article 6(1)(b)	no	N/A	Internally	N/A	No	N/A
Access control	Student	Access cards for halls of residence and teaching rooms	In order to allow access to rooms	Necessary for the University to perform our educational and accommodation contracts with students (Article 6(1)(b)	No		Internally on a restricted basis	In order to allow students access to their rooms	no	
Archibus (Facilities maintenance request database)	Student	Student	Students use database to record maintenance requests for halls of residence	Necessary for the University to perform our educational and accommodation contracts with students (Article 6(1)(b)	No		Internally	To manage accommodation	no	
Complaints made by students in relation to facilities	Student	Student	In order to manage the complaint	Necessary for the University to perform our educational and accommodation contracts with students (Article 6(1)(b)	No		Internally	To manage the complaint	no	
Finance Records										
Car Parking Permits (car registration number, payment details)	Student	Student	In order to provide a car parking permit	Explicit Consent (Article 6(1)(a) Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally	To manage car parking	no	
Student payment records (student bank and address details) - to allow Access to Learning Fund payments and other payments to be made	Student	Student	In order to make payment to student	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally	To enable payments to be made	No	
Student direct debit data and/or card data for payment of fees	Student	Student	In order to take payment of fees	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally	To enable payments to be made	no	
Student kit bursary (Sports students)	Student	Student	In order to assess eligibility for bursary	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally	To enable the award of the bursary	No	
Work related drivers questionnaire for car hire or mileage claims	Student	Student	In order to facilitate car hire or process mileage claims where appropriate	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally	To enable car hire or mileage claims	No	
Motor accident reports	Student	Student, police, insurers	In order to facilitate car hire or process mileage claims where appropriate	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally, with insurers and police	To process any insurance claims	No	
Overseas travel risk assessment forms	Student	Student	In order to assess any insurance requirements	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally, with insurers	To assess travel risks and inform insurance cover	Yes	Data may be transferred abroad in relation to the trip where necessary
Payroll - student ambassadors and other student employment by the University	Student	Student and University	In order to pay student for work undertaken	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally	In order to pay student for work undertaken	No	
aCloud - Expenses system	Student	Student and University	In order to recompense student for expenses incurred when carrying out University duties	Necessary for the University to perform our educational contract with students (Article 6(1)(b)	No		Internally	In order to recompense for expenses incurred whilst carrying out University duties	No	
Publicity										
Press releases relating to students	Student	University and Student	In order to promote a student's achievements, the University or a particular aspect of it or to respond to press enquiries	Explicit consent (Article 6(1)(a)	No		Press	To promote the student and University or to respond to press enquiries	no	
Photographs and videos of students	Student	University	Photos may be taken for publicity reasons or on field trips and at other events	Explicit consent (Article 6(1)(a)	No		Press	In order to promote the student and University	Yes	Unless query is from overseas press If the photo is placed on the University website then it is shared globally