

## **How We Use Student Data at DMU**

### **General summary**

Personal data held by De Montfort University (“DMU”) relating to you may be stored in paper and/or electronic form in accordance with the provisions of the Data Protection Act (1998), and will or may be used for purposes associated with:

1. the organisation of teaching and examinations (both at DMU and in any other institution which may be responsible for providing part of your programme of study), the award of degrees, the collection of fees and the provision of corporate references the operation of analytics programs to enable the measurement of students’ engagement with the university
2. the operation of the DMU Replay programme of audio and video services provided to students in support of teaching for scheduled, blended and distance learning. institutional directories (both paper and computer-based) and the production of graduation ceremony documents general administrative functions such as library borrowing and online information collection and verification processes (some of which will include use of the photographic image of you which appears on your DMU student card) controls on access to buildings or rooms by swipecard (involving the use of card usage records for monitoring building usage and for security purposes) attendance monitoring through swipecard use
3. procedures relating to student complaints and appeals, and to student discipline Contract With Student
4. the administration of student residential services, including monitoring of service uptake and provision
5. membership of De Montfort Students' Union (“DSU”) (or, conversely, ensuring that your details are not given to the Union if you have opted out of membership) (see also De Montfort Students' Union section below)
6. DMU will share applicant and student details with DSU for the purposes of the provision of support and guidance on visa issues, including assistance with submission of applications for entry clearance or further leave to remain. DSU may contact students and applicants to determine individual support needs.
7. statistical processing of aggregated student data by DMU, or by institutions with which it is in collaboration, which may include supporting research projects in the public interest, where the university is satisfied that this will have no impact on the individuals, and that the risk of those individuals being identified is small or non-existent
8. statistical processing of student data by DMU for internal management information purposes in the legitimate interests of the university including, but not limited to, the generation of reports on student achievement, student retention, and quality reviews.
9. equal opportunities monitoring, by DMU, or by other organisations with which it undertakes structured programmes of collaboration under contract, or which are involved in the funding, auditing, accreditation or quality review of the university's activities. This includes, but is not limited to the transfer of information to the National Offender Management Service for the purpose of carrying out the PQF/PQIP Learner Census
10. any disclosures to relevant external bodies (e.g. the NHS) needed in the course of funding, auditing, accreditation or quality review of the university's activities. This includes, but is not limited to:
  - a. registrations of completers/graduates of the PGCert Higher Education (X30080) programme with the Higher Education Academy (HEA)

- b. registrations of completers/graduates of the Recordable Teacher Qualification [RTQ]), with the Nursing & Midwifery Council
  - c. registration of completions. Low-Intensity Psychological Interventions programmes (C84041 and C84080) and am required to complete a return for Health Education East Midlands as to the registered students and any movement on/ off the course.
  - d. registering students with the Health and Care Professions Council (HCPC) upon successful completion of the Social Work programme.
  - e. confirmation of personal details of 2nd and 3rd year students who will be getting bursaries to the NHS Business Services Authority.
  - f. Registration details and student movement on/off the programme for Pre-Registration Nursing, Midwifery and Speech and Language Therapy students to Health Education East Midlands.
  - g. Registration of completers/graduates of successful Nursing and Midwifery students with the Nursing and Midwifery Council.
11. any disclosures needed for the verification of your personal data held by DMU, by another higher education institution, a national body responsible for higher education matters (e.g. UCAS), or by government agencies, where the university is satisfied that such verification is necessary for their legitimate business
12. verification, on request - either directly or by means of an external data processor - of details of your qualifications presented by an external enquirer
13. the production of any returns required by government agencies or other bodies exercising statutory functions (and any organisations to which these have subcontracted their functions), including in particular:
- a. the Higher Education Statistics Agency (HESA), [as detailed on HESA's own website](#);
  - b. local authorities in relation to the preparation of the electoral role and any other statutory functions;
  - c. and (for recipients of Research Council bursaries) Research Councils as [published by them](#).
- Please note that these online notices may change during the academic year.
14. any disclosures to third parties required by law, for example the police, HM Revenue & Customs, relevant councils in respect of council tax etc.
15. information including personal tutor comments from assessments and record of attendance and absence for the purpose of providing references to potential employers in the health field<sup>1</sup>.
16. processing of student work using external online services, including for plagiarism detection, which may hold personal data on servers outside the European Economic Area (EEA)
17. following completion of your programme of study, the transmission of your degree title and classification to any educational institutions which you may have attended within two years before arrival at DMU
18. the transmission to you of information on internal and external events and facilities likely to be of interest to the student body, or to a particular group to which you belong

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<sup>1</sup> This document was originally published 18<sup>th</sup> September 2017. Item 15 was added on 7<sup>th</sup> November 2017.

19. inviting you to participate in voluntary surveys of student opinion, which may either be nationally-organised (including those referred to in the [HESA notice](#) mentioned above), or organised by DMU with a view to enhancing the student experience internally inviting you to participate in voluntary surveys of student opinion, with a view to assisting in research relevant to DMU' development
20. alumni relations activities, including follow-up surveys of employment by the university, and fundraising, which may involve the use of information obtained from tracing agencies
21. continuing provision of any DMU online services offered to alumni (including email)
22. inviting you to participate in nationally-organised surveys of higher education leavers' destinations after you graduate, or passing your contact details to any authorised agency for a survey of this kind, as mentioned in the [HESA notice](#) referred to above
23. participation in the [DMU Global](#) programme
24. participation in the [Higher Education Degree Datacheck](#) (HEDD), the degree verification service
25. participation in the [Higher Education Achievement Record](#) (HEAR)
26. participation in the student attainment record, [CareerHub](#)

Systems used for the provision of services will often be populated with the basic details of all eligible individuals, in order to enable application processes for those who seek to avail themselves of these services. The main examples of this already in operation are the DMU student accommodation management system, and the system used by the Students' Union to process the personal information of students (unless they have opted out of Union membership - see below).

## Organisation of Teaching and Examinations

The purpose of "organisation of teaching and examinations" referred to above may include monitoring the general quality of education provided on your programme - for example by reviewing student work alongside the associated written feedback and marks. Unless you object by notifying your Departmental Administrator, this material may also be shown anonymously to other students at DMU, as an example of work on the programme, to DMU staff for the purposes of training in assessment methods, or to external bodies as detailed above. The university generally recommends retention of sampled student work for three years, and if your Department needs to retain your work for longer for the above purposes, or to use it for other purposes, it must seek your written consent.

DMU is piloting the recording of teaching events (initially confined to formal lectures). However no recordings of your voice or image will be taken by the university without your prior knowledge, and such recording will not take place at events which are a required part of anyone's programme of study unless provision has been made for opting out (or compulsory recording has been notified to students before they were accepted for the programme). An exception arises where DMU facilitates the production of recordings to support the private study needs of students with a disability, which may lead to other students being incidentally recorded along with the lecturer.

You should also be aware that the university is not in a position to control (or even to have knowledge of) the production of private recording by those who attend teaching sessions, although it may issue guidance on good practice, and the taking of private recordings which are to be placed in the public domain requires, under our general regulations, the permission of those being recorded.

## Transfer of your personal data to other organisations

Certain routine administrative procedures which apply to all students will require the transfer of personal data about you by the University to:

- DSU (see further in separate section below)
- any organisation (Data Processor) acting under contract to the University to process personal data which it holds (or acting similarly on behalf of the DMU Students' Union)
- any external service facilitated by the University which you have stated you intend to use (but the University will provide you with details of the information to be transferred when you apply for the service)

Should you be involved in a placement or exchange visit (compulsory or optional) during your period of study at DMU, this may involve some of your personal data held by the University being transferred directly to the placement provider. Should this apply, your department must inform you of what personal data is being transferred, and why, before the transfer takes place. In the event of any complaint from a placement provider about a student's conduct, the university may provide feedback on the outcomes to the provider on a confidential basis, where it believes this to be in the public interest.

Should your programme of study be delivered wholly or in part by another institution, this may involve some of your personal data held by the university being transferred directly to that external educational provider. Should this apply, your department (or a relevant central office) must inform you of what personal data is being transferred, and why, before the transfer takes place.

If your training/studies at DMU at any point involves work with children or vulnerable adults and/or if your programme is accredited by certain professional bodies concerned with health and social responsibility, the university will pass data to relevant external bodies to discharge its statutory responsibilities and to enable routine vetting for fitness to practise to take place where appropriate.

If you have a UK student loan, the university will make the required returns to the currently relevant national agency to confirm your attendance at DMU and the academic programme which you are following.

If you have entered the UK on a Tier 4 student visa there are certain circumstances - including, but not confined to unauthorised absences or failure to meet reporting requirements - in which the University is obliged to pass information to the Home Office (UK Visas and Immigration). [[See more information about this](#)]

## De Montfort Students' Union

DMU Students' Union is an independent Data Controller from DMU within the meaning of the Data Protection Act (1998) - i.e. it has separate legal responsibilities for the processing of personal data. Almost all students wish to be members of the Union as it provides free services, imposes no obligations, and can be ended at any time. Students can however opt out of Students' Union membership within the online Enrolment process managed by [Student and Academic Services](#).

Membership of the DMU Students' Union entails the transfer of personal information by the university to DSU for the purposes of monitoring and evaluation of DSU charitable aims and objectives, administration of elections, administration of DSU clubs and societies, administration of DSU Course and School Reps, administration of DSU representation channels, administration of Demon Media Volunteers, production of reports for Union or University requirements, verification of student's identity, administration of ticket sales, email communication between RUSU and its members, email communication between active members, administration of HEAR Transcripts (Higher Education Achievement Record), assisting students with visa

applications. If the Union wishes to use the information for other purposes, it must obtain your consent by contacting you directly.

**Information transferred to DMU Students' Union is divided into three categories:**

- Automatic transfer for all students who have not opted out of membership: name, reference number, University email address, department and programme (including whether undergraduate or postgraduate, full- or part-time, and year of study).
- Additional information normally transferred, but where students may opt out of the transfer while remaining a member of the Union (either via the Online Enrolment process managed by [Student and Academic Services](#))
- Information about ethnicity, nationality and disability, which is only transferred to the Union when students have given explicit consent (by the same means as above)

## Responsibilities relating to IT facilities

DMU will be a Data Controller where DMU obliges you to use specific DMU-provided or procured IT facilities in relation to your studies at DMU and which you use properly for those purposes. Despite that, you, and not DMU, are Data Controller for and responsible for the content of and attachments to any emails which you send from your DMU student email account, for emails and any attachments, received by you at such account and for data in your contacts, address book, calendar, tasks and similar (excluding emails and their attachments between you and DMU staff and related data in relation to your studies at DMU, where DMU will also be an independent Data Controller for them).

Where DMU is not a Data Controller, it is not obliged to comply with the Data Protection Act 1998 and those data will not be accessible from DMU by individuals [making subject access requests](#). However, in those cases DMU, and/or external providers of relevant IT facilities, may hold data on your behalf as Data Processor and in that case would only use it as instructed by you and would seek to apply appropriate technological and organisational security measures to those data.

Where you choose to use other or additional IT facilities from external providers, you agree do so directly with them and subject to their terms and privacy policies, in which case DMU is not the responsible Data Controller.

Should you decide to use any DMU online services after leaving the university, the arrangements set out above concerning voluntary usage continue to apply. Online services will include email: the university's email service provider may at its discretion provide different versions of the email service to alumni and current students, and you decide to use alumni email services on the basis that you are satisfied with the provider's current terms.

## Disability

Should you, either during the admissions procedure or at any point in your studies, give or have given information about a disability which you believe yourself to have, this information will - unless you object explicitly - be passed to any member of the university who requires it in order to ensure appropriate arrangements for teaching, examination, pastoral support or domestic facilities (including residential facilities should you live in DMU accommodation).

## **Right to object to or to opt out of processing of personal data, and to access personal data after leaving**

All students have a right to opt out of certain personal data processing by the university which is voluntary. Students can do this via the enrolment process managed by Student and Academic Services.

If you have any concerns about the university's processing of your personal data relating to these or other areas at any time, you should contact [Student and Academic Services](#).

Once you have commenced your programme of study you have the **right to object**, using the complaints procedure under [General Regulations](#), to any processing by the university of your personal data, including its processing by particular individuals, on the grounds that this has caused you unwarranted damage or distress. The university must reply to such a request and must give grounds for any refusal to cease processing.

Subsequent to your leaving DMU, the data held by the university that relates to you will be held for the period specified in the university's Retention Schedule, and confirmation of any details held, including your award and dates of attendance, will be released to you on application and payment of any appropriate fee.