



# Students Privacy Notice

This Privacy Notice is for current students from the point of provisional enrolment.

|     |   |   |
|-----|---|---|
| 1.  | Introduction .....                              | 1 |
| 2.  | What information do we collect about you? ..... | 2 |
| 3.  | Sources .....                                   | 4 |
| 4.  | How will your information be used? .....        | 4 |
| 5.  | Who do we share your information with? .....    | 6 |
| 6.  | Security .....                                  | 8 |
| 7.  | Retention .....                                 | 8 |
| 8.  | Your Responsibilities .....                     | 9 |
| 9.  | Data Subject Rights .....                       | 9 |
| 10. | Contact Us .....                                | 9 |

## 1. Introduction

1.1 NMITE is the registered data controller in relation to your information, as defined in the Data Protection Act 2018 and is committed to protecting your rights, in line with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR). NMITE’s nominated representative for data protection legislation, and the Data Protection Officer is:

James Newby  
Chief Operating Officer  
NMITE  
Blackfriars Road  
Hereford  
HR4 9HS

1.2 Transparency is a key element of the GDPR, and this Privacy Notice is designed to inform you:



- i. how and why NMITE uses your personal information,
- ii. what your rights are under GDPR, and,
- iii. how to contact us so that you can exercise those rights.

## **2. What information do we collect about you?**

2.1 In order to provide our services, NMITE will collect and process information about you.

2.2 The types of personal information collected and processed may include, though is not limited to, the following:

- i. Contact information and personal details:
  - Name(s)
  - Email address(es)
  - Age / Date of Birth
  - Extra-curricular activities
  - Specific circumstances (e.g. care leaver / looked after child / estranged)
  - Names changes
  - National Insurance number
  - Address(es)
  - Next of kin
  - Gender
  - Telephone number(s)
  - Nationality
  - Disability
  - Photograph(s)
  - Area / Country of residence
  - Criminal convictions (that occur within the duration of your studies)
- ii. Your academic and learner records:
  - Schools / colleges attended
  - Qualifications and grades
  - Experiential (non-academic) learning
  - Programme and module details/results
  - Attendance, progress & current status



- Final results
  - Video and audio recordings of teaching and learning activities
  - Diagnostic assessments
  - Details of off-site working
  - Use of and engagement with NMITE services and events
  - Engagement with the Virtual Learning Environment
  - Learning Contract
- iii. Financial information:
- Funding, bursary, and fee-related information
  - Sponsor
  - Bank/card/payment details
  - Income (yours/parental/household)
  - Debt information
- iv. Additional equality/statutory monitoring information:
- Religion / belief
  - Sexual Orientation
  - Ethnicity
  - Gender identity
  - Pregnancy, maternity, paternity, adoption
  - Socio-economic background
- v. Information relating to your health, disability, wellbeing, and safety:
- Evidence of disability
  - Health records
  - Reasonable adjustments
  - Details of extenuating circumstances
  - Safeguarding information
  - Pastoral notes, counselling records
  - Occupational health referrals and reports
  - Campus CCTV images
  - Absence information (including reasons and dates)



- Details of health and safety incidents
  - Disabled Student Allowance documents
  - Website data linked to extremist ideologies
- vi. Information relating to your career and employment:
- Curriculum Vitae
  - Career readiness
  - Employer details (current / previous)
  - Employment status

### **3. Sources**

- 3.1 Relevant information collected prior to your enrolment (from your application, from pre-enrolment communications with you, and from previous outreach activities) will form part of your student record. Data is then collected from you at enrolment and updated throughout your course.
- 3.2 Most of the information that we hold is collected directly from you as the data subject, but other sources of personal information include:
- i. collaborative teaching/research partners
  - ii. schools/colleges
  - iii. assessment centres
  - iv. funding bodies, employers, and sponsors - i.e. where an organisation is paying your fee

### **4. How will your information be used?**

- 4.1 NMITE will use your information in order to fulfil all aspects of our contract with you:
- i. To manage all the elements of our contract with you and the student lifecycle from enrolment through to graduation and becoming a member of the alumni, including course delivery, teaching, and learning, off-site working, and assessment
  - ii. To monitor engagement for purposes of attendance monitoring and to ensure compliance with the requirements of the Student Loan Company and/or UK Visa and Immigration.
  - iii. To process payments to and from you or made on your behalf
  - iv. To identify you and manage access to our facilities and services
  - v. To provide support services including, library, IT, financial, careers, disability, and wellbeing support and to enable offers of additional support to you
  - vi. To monitor progress, engagement, and attendance in order to



- Improve learning outcomes
  - Target appropriate support
  - Support the development of a personalised academic experience
  - Ensure course requirements are met
- vii. To enable us to investigate, consider, respond to and monitor
- reasonable adjustments
  - extenuating circumstances
  - academic appeals
  - complaints
  - disciplinary cases
  - academic conduct
- and to provide information to professional and regulatory bodies which deal with such matters
- 4.2 NMITE will use your information in order to meet our public tasks (learning and teaching, research, knowledge exchange)
- i. To monitor, review and evaluate the quality, standards and effectiveness of our teaching, research, and other services and facilities
  - ii. To produce reports and returns for funding agencies, government departments, and public bodies and to facilitate student and graduate participation in national surveys where NMITE is required to do so
  - iii. To award and verify qualifications and awards
- 4.3 NMITE will use your information in order to comply with legal obligations
- i. To ensure the health, safety, and security of those on campus
  - ii. To monitor and promote equality and diversity within NMITE
  - iii. To comply with immigration compliance checks
  - iv. For safeguarding purposes
- 4.4 NMITE will use your information in order to protect your vital interests or those of another individual
- i. To protect the vital interests of students and others, i.e. in emergencies/life or death situations/where we believe that a student or another individual is at significant risk of harm



- 4.5 NMITE will use your information for a number of legitimate business purposes, which may include:
- i. To plan, deliver and review our services, and facilities.
  - ii. To provide you with information and updates about our services, facilities, opportunities to get involved with NMITE activities
  - iii. To protect our premises, facilities and other assets and resources
  - iv. To monitor and manage internet use e.g. extremist content
  - v. Learner Analytics
  - vi. Audio and visual recordings for course evaluation
- 4.6 We may also ask for your consent to use your personal information for other purposes. You will be given additional information for each purpose and have the right to withdraw your consent at any time.

## 5. Who do we share your information with?

- 5.1 Where necessary, in order to provide the services which, we have informed you of, personal information will be shared internally between academic and professional service departments across NMITE or outside of NMITE for these purposes. The privacy of your personal information is paramount and will not be disclosed unless there is a justified purpose for doing so. **NMITE never sells personal information to third parties.**
- 5.2 This section outlines the major organisations and the most common circumstances in which NMITE discloses information about its students.
- i. NMITE staff who need the information for administrative, teaching, research, assessment, and student support purposes.
  - ii. Parents, guardians, and other family members only where you have given your consent or in the event of an emergency where the disclosure of personal information is considered in your best interests or pertinent to your safety and well-being.
  - iii. Contractors and suppliers, where NMITE uses external services or has outsourced work which involves the use of your personal information on our behalf. NMITE will ensure that appropriate contracts and/or information sharing agreements are in place and that the contractors and suppliers process personal information in accordance with the GDPR and other applicable legislation. Examples of suppliers include IT services and support, confidential waste disposal, mailing services, election ballot services.
  - iv. Government bodies and departments, in the UK and overseas, responsible for:



- public funding
  - sponsorship
  - statistical analysis, monitoring and auditing
  - regulatory matters
- v. NMITE shares information with a number of organisations to facilitate academic, financial, and administrative functions essential to your contract with us:
- student funding organisations in connection with grants, fees, loans, and bursaries
  - employers, other education providers or others sponsoring students to provide references, and updates on attendance, progress, conduct, and matters relating to fees and funding
  - validating and professional bodies in connection with registration and awards
  - collaborating organisations that provide assessment or student support
  - partners who facilitate off-site working
  - external moderators of assessments
  - 3rd party organisations who collate data with regards to national student activity and attainment for the purposes of statistical analysis, monitoring and use by member organisations to inform recruitment and other activities.
  - NMITE's insurers, legal advisers, and auditors
  - debt collection agencies where fees are outstanding, and all other means have been exhausted
- vi. NMITE may share information with external services to provide additional support for individual students
- the emergency services and/or other support organisations called upon in the case of an emergency where the disclosure of personal data is considered in the student's vital interests or pertinent to their safety and well-being
  - specialist external support services, e.g. mental health, rape crisis, external Disabled Student Allowance (DSA) services
  - student GP
  - accommodation provider



- vii. NMITE is also required to provide information to a number of government and public bodies to assist with their public tasks:
- the Department for Work and Pensions as required by the Social Security Administration Act 1992
  - Electoral Registration Officers for the compilation of the electoral register as required by Regulation 23 of the Representation of the People (England and Wales) Regulations 2001.
  - the Office for National Statistics for the purposes of conducting the national census
  - local authorities for the purpose of assessing and collecting Council Tax
  - the Home Office and relevant UK immigration agencies
  - the police and/or other organisations responsible for safeguarding or investigating a crime where a student may be involved

## **6. Security**

- 6.1 Data protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. There are comprehensive and effective policies and processes in place to ensure that users and administrators of NMITE information are aware of their obligations and responsibilities for the information they have access to. Training is provided to new staff joining NMITE and existing staff have training and expert advice available if needed.
- 6.2 Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, and paper files will be stored in secure areas with controlled access.

## **7. Retention**

- 7.1 Information is then collected from you at enrolment and updated throughout your course. Most student data is held for the duration of your course plus one further academic year. Some data is held for audit purposes beyond this time and the retention period depends on the type of audit (up to 7 years). Some data is held for statistical reporting purposes and analysis for a further 6 years. Data from complaints, appeals, disciplinary, are kept for 6 years in case of further queries or actions.
- 7.2 Relevant information from your student record will form the basis of your alumni record which will be held and used after graduation. Details of your award is kept permanently





so that your award can be verified in the long-term to future employers and educational providers

## 8. Your Responsibilities

- 8.1 You have a responsibility to keep your personal details up-to-date; you can do this by contacting [studentservices@nmite.ac.uk](mailto:studentservices@nmite.ac.uk).

## 9. Data Subject Rights

- 9.1 One of the aims of the General Data Protection Regulation (GDPR) is to empower individuals and give them control over their personal information.

The GDPR gives you the following rights (with some legal exceptions)

- i. The right to be informed
- ii. The right of access
- iii. The right to rectification
- iv. The right to erase
- v. The right to restrict processing
- vi. The right to data portability
- vii. The right to object
- viii. Rights in relation to automated decision making and profiling

## 10. Contact Us

- 10.1 If you would like to request copies of your personal information held by NMITE please refer to the guidance for making a Subject Access Request, contained in NMITE’s Data Protection Policy.

|  |   |                   |
|--|---|-------------------|
| Policy Owner                               | Director of Student Lifecycle                   |                   |
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|  | 08/2023   | Annual review     |
| Summary of changes made to this version    | 2.2ii – additional of VLE engagement monitoring |                   |



|  |   |
|--|---|
|  | 4.1ii – additional of how we will use VLE monitoring data |
| Date for next review                                       | 08/2025   |
| Related Policies, Procedures, Guidance, Forms or Templates | Data Protection Policy<br>Data Retention Policy           |
| Policies superseded by this Policy                         | V3.0_22/23  |