



Applicant and Student Privacy Notice

Introduction

Throughout this privacy notice, "University" "we", "our" and "us" refers to the Norwich University of the Arts. "You" and "your" refers to applicants and enrolled students.

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information relating to our applicants and enrolled students. This is essential for us to carry out our legal responsibilities, carry out your request for services, and manage our operations. We hold personal information and comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

You may also want to read other Norwich University of the Arts privacy notices. If you use our website, please read the website privacy notice. We do our utmost to protect your privacy. As such we have security systems and procedures to protect information from unauthorised disclosure, misuse, or destruction.

What types of information we hold about you

During your involvement with the University, your personal information is collected, stored, and processed securely by us. The data we process includes, but is not limited to:

- Your name, contact information such as address, email address and telephone number, your date of birth, national insurance number, country of domicile, and your nationality. If you are an overseas student, we also collect information about your passport and visa.
- Information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended, places where you have worked, the courses you have completed, dates of study and examination results.
- Information used to contact you or your next of kin in case of an emergency.
- Information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a bursary.
- Your attendance, assessment and feedback, and qualifications awarded.
- Details of your courses, enrolments, timetables, and room bookings.
- Financial information collected for the purposes of administering fees and charges, loans, grants, studentships, financial support and issuing refunds.
- Information about your engagement with and use of the University's services, such as the library and employability support services.
- Information relating to the provision of advice, support, and welfare, such as information relating to your use of the services offered by our Student Support Team.

- Information relating to the prevention and detection of crime and the safety and security of our staff and students, including, but not limited to, CCTV recording and data relating to breaches of the University's regulations.

The University also needs to collect and process 'sensitive personal data' under the DPA, and 'special categories of data' under the UK GDPR including:

- Your health and disabilities, to provide support and enable access to the University's services and to determine course suitability.
- Your ethnic origin and sexual orientation, for equal opportunities monitoring.
- Previous criminal convictions, before a place can be offered on certain programmes.

How and why we collect this information

The University will collect data about you during its recruitment, admission, and registration processes. These data will either be provided directly by you or, where your data is passed to us via a third party (e.g. UCAS or the SLC), the data we hold will reflect what you have provided to the third party and agreed to share with us, as part of your agreement with that third party. The University will continue to collect data from you throughout your time at the University using its established systems and in accordance with its legitimate interests. The University will also generate information about you which will become your personal data (e.g. your assessment marks).

We collect personal information from you for a range of purposes. In order to process your application to study with us and for those who enrol, we process your information to facilitate your education and deliver and improve services and facilities. This information also helps in our work with you in all aspects of our student services, including disability support and support for international students. We also report to statutory authorities on performance.

The University complies with the provisions of the Data Protection Act 2018 which sits alongside the UK General Data Protection Regulation (UK GDPR). Article 6 of the UK GDPR defines six different lawful grounds for an organisation to be permitted to process personal data, and the University is legally obliged to determine and advise you of under which of the legal bases the different categories of your personal data is processed. These are as follows:

The University relies on Article 6(1)(b), '*for the performance of a contract (or negotiations entering into a contract)*' as its legal basis when processing your personal data for the purposes of administering and delivering your course of study and related activities or services that support delivery of your course or your studies, such as careers support, events or other opportunities. This applies for much of the data we collect when you apply for a course of study, through to your graduation.

The second legal basis we rely on is Article 6(1)(e), '*for the performance of a public task in the public interest*'. This applies to where we use your personal data to meet our obligations or duties, or to exercise our powers, as a public authority, or to support the functions of other authorities that have a public task defined within law. Examples of this would include our obligation to share data with the Higher Education Statistics Authority ([HESA](#)), Ofsted, professional bodies, auditors, assessors or other external regulators, to support safeguarding and crime prevention measures etc. Where possible, the University would first anonymise the data.

The University would rely on Article 6(1)(f), '*legitimate interests*' as its legal basis where we judge the use of the personal data to be within our legitimate interests (or the legitimate interests of another party) and where we do not deem this to be privacy-intrusive or a risk to your own rights

and freedoms. This is where the use of data poses no risks to individuals and is for the purposes of improving services or investigating technical issues.

We rely on Article 6(1)(a), '*Consent*' as our legal basis which applies when you have given us your freely given, informed, specific consent. An example may be where you have given us consent to discuss your circumstances with a representative or family member or where you wish to receive some types of communications from us after you have completed your studies. It is important to note that you have the right to withdraw that consent at any time.

The University would rely on Article 6(1)(c) '*legal obligation*' where processing of your personal data is absolutely necessary for the University to comply with a legal obligation.

'*Vital interests*' as defined in Article 6(1)(d), means 'to protect life' and the University would rely on this as its legal basis only in life-threatening circumstances, for example, where we share your personal information with the emergency services or security, our hall tutors, our accommodation service providers and welfare teams if there is significant and credible evidence to suggest that you, or someone else may be in danger.

Some of the personal information used for the above purposes will be classed as 'sensitive personal data' also known as 'special category personal data.' This can include race and ethnicity for the monitoring of our responsibilities in respect of the Equality Act 2010, or medical information relating to the delivery of necessary learning support. Access to and the sharing of this kind of 'special category' personal information is strictly controlled. The University's legal bases for processing this sensitive data under Article 6 of the UK GDPR are Article 6(1)(e), '*for the performance of a public task in the public interest*' and Article 6(1)(f), '*legitimate interests*'. In addition, for sensitive data, the University is required to identify an appropriate lawful condition under Article 9 of the UK GDPR which is Article 9(2)(a) '*explicit consent*'.

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

In some circumstances, where you have made your application through an overseas agent, your data will be processed outside of the EEA. In these cases, the University has provisions and safeguards in place to protect your information and ensure that it is managed in a manner which meets the appropriate high standards.

How we use your information

The University will always store your data safely and will never disclose it to any other person unlawfully. The tasks the University may undertake using your data may include:

- Administration of the application process, including informing the decision about suitability for potential programmes of study.
- Academic administration and facilitation of your education, including admission and registration, administering programmes of study, organising professional placements, recording progress, agreeing awards, assessments, examinations, attendance monitoring and research.
- Administration of the financial aspects of your relationship with us and any related funders.
- Administration of your use of facilities and participation at events (for example building access, computing services, libraries, accommodation, employment services, functions, graduation).

- Administration of complaints, investigations and disciplinary proceedings concerning student misconduct, including investigations into academic misconduct.
- Administration of academic appeals issued by students and other complaints brought against us.
- Administration of other regulatory processes where you provide personal information to us – for example, to support extension requests, extenuating circumstances claims and intermission applications, to enlist participation in student surveys and student feedback reporting.
- Fulfilment of statutory reporting requirements.
- Monitoring our responsibilities under equality legislation.
- Ensuring the health, safety and well-being of students and applicants.
- Assessment and provision of support services to students and applicants.
- Monitoring compliance with the University's regulations.
- Management reporting and performance monitoring.
- Monitoring compliance with the terms of any visa issued under the sponsorship of the University.
- For the provision of your academic transcript and if appropriate an award certificate.
- Administration of the University's CCTV system in accordance with our CCTV code of practice.
- Supporting your Student's Union membership.
- Facilitation of industry and employer engagement.

After you have graduated from the University, a core record of your studies is retained indefinitely so that the details of your academic achievements can be confirmed. These details are also used for statistical and historical research.

Additionally, when you have ended your studies, your contact and core personal details are shared with our Alumni Team and added to our alumni records. For information on how we collect and use data about our alumni, see our alumni privacy notice on our website.

Who we might share your information with

The University may disclose certain personal information to external organisations to carry out our legal responsibilities, functions and manage our operations or because you asked us to. These may include:

- Higher Education Statistics Agency (HESA) which is now part of Jisc. It is important to note that, with effect from 4 October 2022, any personal data processed by HESA as controller has been transferred to Jisc, who is now the data controller of this personal information. This means that Jisc determines the manner and purpose if its use. You can find further details by reading their [updated Privacy Notice here](#).
- Relevant Government Departments (e.g. Home Office, including UK Visas and Immigration, Foreign and Commonwealth Office, Department of Health. Department of Education).

- Relevant executive agencies or non-departmental public bodies (e.g. HM Revenue and Customs, Health, and Safety Executive).
- Office for Students (OFS).
- Universities and Colleges Admissions Service (UCAS).
- Office for Fair Access (OFFA).
- Office of the Independent Adjudicator (OIA).
- Organisations running student experience surveys, including the Student Experience Survey (SES), National Student Survey (NSS), the Postgraduate Taught Experience Survey (PTES), the Postgraduate Research Experience Survey (PRES) and the Destinations of Leavers from Higher Education survey (DLHE).
- Providers of anti-plagiarism software.
- Student Loans Company (SLC).
- Relevant professional or statutory regulatory bodies and other course accrediting organisations.
- Local authorities to administer Council Tax and for electoral registration.
- The police and other law enforcement agencies/MASH.
- Our insurers in respect of accidents.
- Auditors.
- Your sponsors, where a contract exists.
- The providers of any external learning or training placements.
- Library services, including access to online resources and dyslexia support.
- Companies providing specific services on behalf of the University for graduation.
- Companies providing specific services on behalf of the University for student trips and/or exchange programme.
- Third parties who work with us to provide student support services (for example counselling and dyslexia testing).
- Third parties who work with us to provide student accommodation.
- Hosts of events.
- Norwich University of the Arts Student's Union.
- Your parents/guardian (if you are under 18 years old).
- Banks and employers, when you ask us to confirm that you are a student here or write a reference.
- Debt collection agencies if you owe us money which we have not been able to recover.
- Third party software systems required to facilitate applicant and enrolled student data functions (for example Heritage Cirqa, Azorus, Office 365, Interact). These organisations may be based outside of the UK. These organisations have safeguards in place, which meets appropriate standards, to protect your personal data.

We will not normally disclose any other personal information about you to other external organisations without your consent unless it is in your vital interests to do so (for example in the event of a medical emergency).

How long we keep your information

We will keep your personal information only as long as is necessary to fulfil the purpose for which it was collected and in accordance with the University's records retention schedule. This means that, in normal circumstances, your data will be held for six years after you have left the University, in line with the University's Data Protection Policy.

Your rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information (this is known as a Subject Access Request or SAR).
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. If you wish to correct any information about you held by the University, please contact the Registry department in the first instance registry@nua.ac.uk
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact our Data Protection Officer, Sue White at dataprotection@nua.ac.uk if you wish to make a request or have any queries.

If you believe your data has been breached, please speak to the University. The [Information Commissioners website](#) provides more information on data breach rights.

How to contact us

If you require further information or have any concerns about how your personal information is held and processed by us, please email the University's Data Protection Officer, Sue White dataprotection@nua.ac.uk or write to us at Data Protection Officer, Norwich University of the Arts, Francis House, 3 -7 Redwell St, Norwich NR2 4SN.

You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

ICO Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Changes to this privacy notice

We keep our privacy notices under regular review.

This privacy notice was last updated on 31 October 2022.