

# STUDENT PRIVACY NOTICE

## (PROCESSING YOUR PERSONAL DATA)

Please read this information before you enrol

**This privacy notice establishes the University's procedures governing the collection and release of student information and is provided to students at the application and enrolment stages.**

### General

The University needs to collect, process and use personal data (information) for a variety of purposes about those who express an interest in becoming a student of the University (prior to application and enrolment stage), those who become enrolled students of the University including, its staff and other individuals who come into contact with the University.

In collecting, processing and using data the University must comply with the requirements of the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) which govern the processing of personal information. The University Data Protection Policy sets out the rules for adherence to the requirements of data protection laws and is available at: <https://www.bolton.ac.uk/about/governance/documents/>

Personal information means any information relating to an identified or identifiable living person. An identifiable person is one who can be identified, directly or indirectly, in particular by an identifier such as a name, identification number, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. Processing is any activity carried out involving personal information, including holding and storing it in any format, both digital and hardcopy.

The University takes the matter of data security and protection extremely seriously. The personal data you provide to us during the application and enrolment procedure and throughout your time as a student is securely held by the University and will be treated confidentially and with sensitivity. The University is notified as a Data Controller for all personal information that it holds and processes, except where it is done in the capacity of a data processor on behalf of another data controller.

The University's Information Commissioner's Office data controller registration number is Z5888188.

If you have any questions about our privacy practices, please contact our Data Protection Officer.

How to contact us: University of Bolton Data Protection Officer:

Email: [dpo@bolton.ac.uk](mailto:dpo@bolton.ac.uk)

Address: Data Protection Officer  
The University of Bolton  
Deane Road  
Bolton  
BL3 5AB

## **Changes to this privacy notice**

It is important that you check this privacy notice for updates. If we make changes that we consider to be important, we will let you know by contacting you using the contact details you have provided to us.

## **The types of personal information we collect**

The University collects and processes information relating to its students, including images, personal details, family and social circumstances, education and training records and financial details for various academic, administrative and health and safety reasons. The University may collect, hold and process what may be considered 'special category personal data'.

Special category personal data is generally defined as information related to racial or ethnic origin, political opinions, religious or other beliefs, physical or mental health, other medical information including biometric and genetic data. In some instances, the University will also collect and process criminal offence data relating to criminal allegations, proceedings, convictions or related security measures.

Not all of the personal information the University holds about you will come directly from you. It may, for example, come from other organisations to which you belong or professional service providers. We also collect personal information from third parties such as collaborative partner organisations, service providers offering services provided by the University, for example student recruitment representatives, Student Finance England and UCAS.

## **Where we store and process personal information**

The University is a global institution and in certain circumstances the University may transfer student personal information to third parties located in countries outside of the European Economic Area. Any such transfers will be strictly in relation to the delivery of the University's core services. For example, transfers of student educational information to collaborative partner institutions abroad, IT services used by the University may involve the transfer or hosting of student personal data overseas or personal information may be shared with international agents that the University uses for the delivery of services to overseas students. All instances of overseas transfers of personal data are subject to appropriate and adequate safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements.

The European Commission decisions on the adequacy of the protection of personal data in third countries are published here: [ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en](https://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en).

## **How we secure personal information**

The University takes data security seriously and uses appropriate technologies and procedures to protect personal information. Our information security policies and procedures are reviewed regularly and updated as necessary to meet our service needs, changes in technology and regulatory requirements. Further information on data security is published at: <http://www.bolton.ac.uk/studentinformation-policyzone/Home.aspx>

## **How long we keep personal information**

Information of your course registration and final reward will be kept permanently by the University with more detailed information kept for specific retention periods. The University's Records Retention and Disposal Policy and Records Retention Schedule detailing the retention period for different student records is published at: <https://www.bolton.ac.uk/about/governance/documents/>

## Your right to access and correct your personal information

The University respects your right to access and control your information, we will respond to requests for information and, where applicable, will correct, amend or delete your personal information.

You have the following rights

- request access to your personal information that the University holds;
- rectify inaccuracies in your personal data;
- be forgotten - that is your details to be removed from the systems that we use to process your personal data in certain situations;
- restrict the processing of personal data in certain situations;
- object to the processing of personal data in certain situations. For example, sending and receipt of direct marketing material;
- data portability - obtain a copy of your data in a commonly used electronic form in order to provide it to other organisations;
- object to automated decision making and profiling – object to decisions made by automated means without human intervention in certain circumstances;
- withdraw consent where that is the legal basis of processing.

Students must ensure that all personal data provided to the University is accurate and up to date. Any changes must be notified to Student Data Management at [sdmenquiries@bolton.ac.uk](mailto:sdmenquiries@bolton.ac.uk)

If you are not happy with how the University manages your personal information you should contact the University's Data Protection Officer in the first instance. If you feel that the complaint has not been dealt with to your satisfaction you can formally complain to the University Registrar.

You also have a right to complain to the Information Commissioner's Office about the way in which we process your personal data at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)

## Student and Leavers Surveys

You may be asked to provide information about your experience as a student and your activities after you graduate as part of national surveys used to create statistics to meet the public interest in the outcomes of higher education. The surveys may be undertaken by the University or by an organisation contracted for that purpose. The University will hold your contact details after you graduate in order for you to be contacted to complete a graduate outcomes survey.

Your contact details may be passed to survey contractors to carry out the National Student Survey (NSS), other surveys of students' views about their study, and surveys of student finances, on behalf of some of the organisations listed in the Higher Education Statistics Agency (HESA) statement, see the link below.

Your contact details may be passed to HESA and/or an organisation contracted to undertake a graduate outcomes survey. The survey contractor will only use your contact details for the

survey. HESA may hold your contact details for further graduate outcomes surveys where these are in the public interest.

Further privacy and data protection information will be provided if you are contacted for any of these surveys.

After you graduate, the University may contact you to ask you to complete the HESA 'Destinations of Leavers from Higher Education' survey.

### **Submission of your information to HESA**

It is a statutory requirement for the University to send some of the information we hold about you to HESA every year. HESA is the official source of data about UK universities and higher education colleges, alternative HE providers and recognised higher education courses taught at further education institutions. HESA is a registered charity and operates on a not-for-profit basis.

HESA collects, and is responsible for, the database in which your HESA information is stored. HESA uses your HESA information itself for its own purposes and also shares your HESA information with third parties for specified and lawful purposes. HESA's use of your HESA information may include linking information from it to other data, as described in the HESA student data collection notice, see the link below. All uses of HESA information must comply with the DPA and GDPR.

If you give us information about your disability status, ethnicity, sexual orientation, gender reassignment or religion these may be included in your HESA information and used to assist with monitoring equality of opportunity and eliminating unlawful discrimination in accordance with the Equality Act 2010. Some other special category personal information is used to enable research into the provision of fair access to higher education.

If you are enrolled at a higher education provider in England regulated by the Higher Education Funding Council for England (HEFCE) or Office for Students your HESA information will include details of any financial support you may receive. Your special category personal information will not be used to make decisions about you.

**To read the full HESA student data collection notice please visit:**  
**<https://www.hesa.ac.uk/about/regulation/data-protection/notices>**

### **How we process your personal information – legal basis for processing**

It is necessary for the University to collect, process and use student data in order to perform the contract between you and the University in providing teaching and education support services to students.

The University processes your personal data and special category personal data for the administration and management of all services and processes relating to you. For example, student recruitment, admission, registration, teaching and learning, attendance monitoring, examination, graduation and other services such as accommodation, student support services and careers advice. Information is shared between academic and professional support services of the University for operational purposes as is necessary and proportionate for the intended purpose.

Some processing activities may also be carried out under a legal obligation (for example, disclosing personal data to external parties under statutory powers), where it is necessary to protect the vital interests of the student or another party (for example, disclosures to external parties to ensure the safety and wellbeing of individuals), where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example, collecting or disclosing information in order to meet regulatory or statutory requirements), or where it is necessary for legitimate interests pursued by the University or a

third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of the interests or rights of individuals). Where any of these legal bases do not apply, the consent of an individual to process their personal data will be sought.

Where students' special category personal data is collected and processed by the University this will be on the legal basis of explicit consent of the student, employment or social security/protection requirements, protecting the vital interests of the student or another party, the exercise or defence of a legal claim, reasons of substantial public interest, purposes of medical or health care or where the information has been made public by the student. Any processing will be proportionate and relate to the provision of services by the University.

Table A below sets out the separate categories of personal information that the University may hold, what its purpose is, where the information is located, the method of data processing used, who we share your personal data with and the legal basis for processing that information.

### **When we share personal information**

This privacy notice includes information about who the University may disclose student's personal data, special category personal data and criminal offence data to and how student data is used.

Table A below sets out what information the University may share with other third parties.

Table A below sets out the separate categories of personal information that the University may hold on you, what its purpose is, where the information is located, the method of data processing used, who we share your personal data with and the legal basis for processing that information.

**TABLE A**

No.	Type of information held and purpose	Method of data Processing	Location of data	Data Format	University and/or External Needs	Legal Basis for Processing  (Article 6)
1.	<p><b>Personal Details</b> for Enrolment and Student Number/Identity Card, University email address, Equal Opportunities monitoring. Inclusion of photographic images on the University's computerised student record system.</p> <p>Name, address (term-time and home), e-mail, telephone numbers, gender, date of birth + age, ethnicity, disability, nationality, religion, qualifications on entry, previous education, emergency contact details.</p>	Manual and electronic	Student Data Management, Academic Support Services, Student Services	Enrolment form, personal file, student record database, lists for specific categories of students.	University and External	Article 6(1)(b) or (1)(e) or (1)(f)
2.	<p><b>Course Enquiry and Application</b> for processing, tracking, contact analysis, equal opportunities monitoring.</p> <p>Personal details as in 1 above, previous educational establishment, referees and references, correspondence, decision.</p>	Manual and electronic	Recruitment and Admissions, Academic Support Services, Research Graduate School (research students).	Applicant database, personal file, student record database.	University	Article 6(1)(b) or (1)(e) or (1)(f)
3.	<p><b>Course Admission</b>, enrolment and administration of their studies for processing, tracking, contact analysis, equal opportunities monitoring.</p>	Manual and electronic	Recruitment and Admissions, Academic Support Services, Research Graduate School (research students).	Applicant database, personal file, student record database.	University	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)  Article 9(1)(a)

	Personal details as in 1 above, previous educational establishment, referees and references, correspondence, decision					
4.	<b>Course registration for Award.</b> Qualification aim, join and end dates, timetables, academic years, registered modules, registers, award/s achieved.	Manual and electronic	Student data management, Research Graduate School (research students), Academic Support Services, Student Services.	Enrolment form, personal file, student record database, course, exam board, results lists.	University and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
5.	<b>Academic assessment and progression.</b>  Attendance/withdrawal records for academic action/status.  Change in student status.  Name, ID No., Course details, status, information relating to attendance and/or withdrawal status change and dates, action taken.	Manual and electronic	Academic Support Services, Student Recruitment and Admissions, Student Services, Student Data Management, Standards and Enhancement Office, Research Graduate School (research students)	Personal file, Student record database, exam board results lists, notice boards, enrolment records, personal record in student fees and finance files	University and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
6.	<b>Administration of student related policies and procedures</b> including appeals, complaints, grievances, disciplinary matters, and matters relating to health and conduct and to cheating and plagiarism (unfair means).  Name, ID Number, course, case details, correspondence.	Manual and electronic	Standards and Enhancement Office, Academic Support Services, Student Services, Central Services, Vice Chancellor's Office.	Personal record in appeals file. Unfair means register.	University and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
7.	<b>Interview records/reports for further action/record</b> as requested/applicable. Personal details as in 1 above plus course details, NI number, advice and guidance needed and given, dates of appointments, interviews, meetings, action taken, reports, communications,	Manual and electronic	Academic Support Services, Student Data Management, Students' Union, Research Graduate School (research students), Finance, Standards and Enhancement Office.	Personal File, Personal Records in relevant file	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)

	employment records, external reports and records.					
8.	<p><b>Pursuit of social and sporting activities</b> e.g. relating to use of the University's sports facilities.</p> <p>Membership of clubs, societies and groups for processing, benefits and participation records. Personal details as in 1 above and attendance records, fees/charges, expenses claims.</p>	Manual and electronic	Student Services; Student's Union	Membership, Attendance Lists, Students' Union Opt-Out List	University and External	Article 6 (1)(b) or (1)(f)
9.	<p><b>Off-campus activities</b> for academic records, insurance, charges, attendance report.</p> <p>Visits, field trips, work experience, placements, residential and extra courses/sessions, expenses/claims, risk assessments, performance reports</p>	Manual and electronic	Academic Support Services; Finance	List of participants; records of performance; personal file; intent to travel form;	University and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
10.	<p><b>Provision of University accommodation and other support services</b> such as those of the Library, Disability Services and the Careers Centre.</p> <p>Accommodation records for Halls' allocation, charges and other accommodation guidance. Personal details as in 1 above and residents' lists, applications, correspondence, reports, changes.</p> <p>Outstanding Debts Record/Library Fines for possible action. Name, ID No., course, attendance record, fees fines and charges invoiced and payments made, correspondence, notes of interview/s, record of decisions made, action taken, referral to external debt collection agency, court action.</p>	Manual and electronic	Student Services; Finance Student Data Management; Academic Support Services; Library; Research Graduate School (research students)	Applicants list; personal file; residents database; finance file; fire attendance lists; personal record in debts file; debt collection agency list	University and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)



11.	<b>Granting of awards.</b> Certificate printing for issue to successful students. Name of student and Award gained, issue/collection of certificate.	Manual	Student Data Management	Certificate; certificate issue lists	University	Article 6(1)(b) or (1)(e) or (1)(f)
12.	<b>Processing and recovery of accounts and fees.</b> Course Fees for invoicing. Fees for academic year, sponsor/SFE/student, Amounts paid, date invoiced.	Manual and electronic	Student Data Management, Finance, Research Graduate School (research students)	Enrolment form; invoices; credit and debit lists; student database record; student fees file	University and External	Article 6(1)(b) or (1)(e) or (1)(f)
13.	<b>Awards Ceremonies</b> for invitation of finalist students. Invitations, payments received, photography, filming. And for successful students – tickets, gown hire, attendance, Name and Award gained in brochure, seat label, payments record, ceremony photography and filming.	Manual and electronic	Student Data Management, Finance	Tickets, awards ceremony database, photography and filming, attendance lists	University and External	Article 6(1)(b) or 6(1)(e) or (1)(f)
14.	<b>Research and statistical analysis.</b> Surveys and questionnaires for monitoring and evaluation of provision, research and analysis. If not anonymous – Personal details as in 1 above, course details as in 3 above, opinions, comments, usage of service	Manual and electronic	Student Data Management, Standards & Enhancement Office, Academic Support Services, Student Services, Central Services	Personal record in relevant file	University	Article 6(1)(b) or (1)(e) or (1)(f)
15.	<b>Production of statistical returns required for third party government bodies</b> e.g. the Higher Education Statistics Agency, for completion of government supported survey, statistics e.g. the National Student Survey, the Destination of Leavers in Education Survey and the Teaching Excellence Framework.  Information to 3 <sup>rd</sup> Parties for compliance with statutory and other Regulations	Manual and electronic	Student Services, Student Recruitment and Admissions, Academic Support Services, Central Services, Student Data Management	Personal record in relevant file, HESA return database, HESA destination of leavers from HE return, careers personal file.	University and External	Article 6 (1)(c) or (1)(e) or (1)(f)  Article 9(2)(j)

	<p>applicable to the University. Personal details as in 1 above, Course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p> <p>Career Destinations after leaving for processing. Name, qualification, address, employment/education/other after completing course, where known.</p>					
16.	<p><b>Direct mailing</b> of or about (i) student benefits and opportunities offered by or through the University, (ii) University activities and events organised for students, (iii) services or career opportunities of direct relevance to student interests and (iv) professional and industrial bodies wishing to communicate with students about career opportunities and membership of their body.</p>	Electronic	Student Services, Academic Support Services, Student Data Management, Students' Union, Student Experience	student database record, personal record in relevant file	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
17.	<p><b>Administration of employment contracts</b> where the student is employed by the University.</p>	Manual and electronic	HR, Student Services	Personal record in relevant file	University and External	Article 6 (1)(b) or (1)(c) or (1)(f) Article 9(1)(b)
18.	<p><b>Administration of Alumni membership.</b></p> <p>Alumni Membership, as requested for future contacts. Name, ID No., award, course details, permanent address, donation and gift details, correspondence, employer contacts, professional and personal interest groups.</p>	Electronic	Student Recruitment and Admissions	Alumni database	University	Article 6 (1)(a) or (1)(f)

19.	<p><b>Consideration and granting of prizes, scholarships and bursaries:</b> of discretionary funding available to students; and of other such awards.</p> <p>Name, address, ID No., Course details, status, information supplied on application, record of bursaries and scholarships allocated and decisions made, correspondence, payments made.</p>	Manual and electronic	Student Services; Student Data Management; Academic Support Services; Finance	Personal record in student file	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
20.	<p><b>Administration of a Student Engagement Incentive Scheme:</b> allocation of student credits enabling the purchase of goods and services via an online and/or on campus provision.</p> <p>Name, address, date of birth, ID No., course details, status, email address, telephone numbers, record of credits allocated,</p>	Manual and electronic	Student Data Management; Student Services; Academic Support Services; external incentive scheme provider	Student database, external processor database	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
21.	<p><b>Health and safety of individuals and their property</b> and the protection of University assets, including the use of CCTV.</p> <p>Health &amp; Safety for first-aid assistance, emergency evacuation, hazard risk assessment, accident monitoring. Personal details as in 1 above. plus medical records, accident/hazard reports, consent records, first-aid action</p>	Manual and electronic	Human Resources; First Aiders; Academic Support Services; Student Services; Specialist Services & Safety Manager; Facilities	Personal record in relevant file; occurrences reports	University	Article 6 (1)(b) or (1)(c) or (1)(d) or (1)(f)
22.	<p><b>Operation of a lecture capture and/or simulation suite capture facility</b> relating to the recording of educational activities e.g. lectures or simulation skills based activities held at and by the University.</p>	Electronic	Student Experience; Student Services; Recruitment and Admissions; Academic Support Services; External Examiner	Video archive	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)

23.	<p><b>Automated individual decision making with regard to assessment of fees status and suitability for further financial assistance</b> to be provided to students such as bursaries.</p> <p>Access to Learning Fund for processing application. Name, address, ID No., Course details, status, information supplied on application, record of funds allocated and decisions made, correspondence, payments made.</p>	Manual and electronic	Student Services; Finance; Student Data Management; Academic Support Services	Personal record in student file	University and External	Article 22(2)(a)
24.	<p>To the Higher Education Statistics Agency, HEFCE, Office for Students government departments and other authorised users for the completion of student surveys and analysis of student statistics and/or to enable them to carry out their statutory functions as applicable.</p> <p><b>Gradintelligence (Gradintel)</b> is the University technology partner for delivering <b>Higher Education Achievement Award (HEAR)</b>. Name and email address to enable student activation of their HEAR provided to Tribal student record system provider.</p> <p><b>NHS Health Education Core Skills Training Framework</b> for nursing student statistics, learning and training records. Personal, course, training and employer details as specified by the NHS Health Education Core Skills Training Programme.</p> <p><b>Practice Assessment Record and Evaluation (PARE)</b> for nursing student placement practice assessment learner outcomes and experience.</p>	Manual and electronic	Student Data Management; Tribal Student record system provider; Academic Support Services; NHS Health Education	HESA return database; Student records database; personal file	University and External	Article 6(1)(b) or 6(1)(c) or (1)(e) or (1)(f)  Article 9(2)(j)

25.	<p><b>Local authorities for the purpose of enrolment on the electoral register</b> and exempting student from payment of council taxes.</p> <p><b>Council Tax eligibility.</b> Name, ID No. term-time address, date of birth, course title, course length, course start and expected end date, suspension and withdrawal from course for full time students for eligibility for Council Tax exemption.</p>	Manual and electronic	Student Services	Student records database; student services computer record	University and External	Article 6 (1)(b) or (1)(f)
26.	<p><b>Membership of Bolton Students' Union</b> for processing, benefits, services, student elections and participation records.</p> <p>Personal details as in 1 above, fees/charges, expenses claims.</p>	Manual and electronic	Students' Union	Membership records; students union opt-out list; club and society membership records.	University and External	Article 6 (1)(a) or (1)(f)
27.	<p><b>Police or other regulatory body</b> where pursuant to the detection, investigation or disclosure of a potential crime.</p> <p><b>Information to 3<sup>rd</sup> Parties</b> for compliance with statutory and other Regulations applicable to the University. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports and information supplied.</p>	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Central Services	Personal record in relevant file(s)	University and External	Article 6 1(c) or (1)(f)
28.	<p><b>Close family and emergency services</b> where there is an emergency situation e.g. illness, serious injury or bereavement.</p>	Manual and electronic	Student Services; Academic Support Services; Central Services	Personal record in relevant file(s)	University and External	Article 6 (1)(d) or (1)(f)
29.	<p><b>External examiners for the purposes of assessment.</b></p> <p>Academic Marks, Results and Progress for assessments and Exam Board Results, Published Results lists. Annual</p>	Manual and electronic	Academic Support Services; Student Data Management; Research Graduate School (research students)	Personal file; student record database; exam board records	University and External	Article 6 (1)(b) or 6(1)(e) or (1)(f)

	progress, Exam Board outcomes, credits achieved.					
30.	<p><b>Governmental and regulatory bodies for the purpose of gathering census or other information</b> including the assessment of fees, including electoral registration officers.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other Regulations applicable to the University. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p>	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Central Services	Personal record in relevant files	University and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
31.	<p><b>Home Office and other international and national governmental and regulatory bodies</b> in connection with the assessment of student status.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other regulations applicable to the University. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p>	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Central Services	Personal record in relevant files	University and External	Article 6 (1)(b) or (1)(c) or (1)(e) or (1)(f)
32.	<p><b>Third parties accessing information about student awards</b> - ranged by department and for the verification of awards to employers and other educational institutions.</p> <p><b>Sponsors</b> Attendance/Academic Marks, Results and Progress, if requested by employer or other third party sponsors, who are paying a student's fees</p>	Manual and electronic	Academic Support Services; Student Data Management	Student records database	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)

33.	<p><b>Other educational institutions involved in the delivery of a student's course or programme</b>, e.g. affiliated colleges, exchange institutions, including those outside of the UK and sometimes the EEA; and to other organisations in relation to work placements.</p> <p><b>External Registration</b> for Award. Name, date of birth, gender, postcode, funding status, qualifications on entry, Course, academic progress and achievement.</p>	Manual and electronic	Student Data Management; Academic Support Services; Research Graduate School (research students)	Student records database; registration lists	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
34.	<p><b>Professional bodies</b> where registration with that body is related to or a requirement of the student's studies e.g. the NMC for nursing students, GDC for dental students, IMechE for mechanical engineering students.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other Regulations applicable to the University. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p>	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Central Services; relevant School	Personal record in relevant file(s)	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
35.	<p><b>Banks (and other payment agencies</b> you may use), family, sponsors or other third parties to enable them to pay student debts.</p>	Manual and electronic	Student Services; Student Data Management; Finance	Student records database; personal record in relevant file(s)	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
36.	<p><b>External agents</b> of the University in relation to the repayment of student debts.</p>	Manual and electronic	Finance; Student Services; Student Data Management; Recruitment and Admissions; Academic Support Services	Student records database; personal record in relevant file(s)	University and External	Article 6 (1)(e) or (1)(f)
37.	<p><b>External agencies</b> - which may be based outside the European Economic Area - in</p>	Electronic	Student Services; Standards and Enhancement; relevant School	Student records database; personal	University and External	Article 6 (1)(e) or (1)(f)

	connection with procedures for guarding against plagiarism. (Turnitin)			record in relevant file(s)		
38.	<b>Data Processors</b> in order for them to process data on behalf of the University for any of the purposes for which the University is permitted to process the data, including the provision of academic and academic related services by the University.	Manual and electronic	Student Services; Finance; Student Data Management; Recruitment and Admissions; Academic Support Services; Research Graduate School (research students)	Student records database; personal record in relevant file(s)	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
39.	<b>Provision of references</b> for students or former students.	Manual and electronic	Student Services; Academic Support Services; Student Data Management; Research Graduate School (research students)	Student records database; personal record in relevant file(s)	University	Article 6 (1)(e) or (1)(f)
40.	<b>Sponsors</b> , including the UK research councils, the Student Finance England and sponsors located overseas.	Manual and electronic	Student Services; Academic Support Services; Student Data Management; Research Graduate School (research students); Finance	Student records database; personal record in relevant file(s)	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
41.	<b>External bodies</b> and individuals who have funded student prizes and awards.	Manual and electronic	Student Services; Academic Support Services; Student Data Management;	Student records database; personal record in relevant file(s)	University and External	Article 6 (1)(b) or (1)(e) or (1)(f)
42.	<b>Official letters as requested by the student.</b> Name, ID Number, Course, Academic Year/s status. Additional information as requested by student. Request form.	Manual and electronic	Student Services; Academic Support Services; Research & graduate school (research students)	Personal record	University	Article 6 (1)(e) or (1)(f)
43.	To the University's external lawyers, insurers in respect of accidents occurring within the institution and external auditors.	Manual and electronic	Finance; Student Data Management; Central Services	personal record in relevant file(s)	University and External	Article 6(1)(c) or (1)(e) or (1)(f)



The University processes “special categories of personal data” and “criminal convictions and offences personal data” for the following purposes and for release to the following third parties:

No.	Type of information held and purpose	Method of data Processing	Location of data	Data Format	University and/or External Needs	Legal Basis for Processing (Article 9)
44.	To the Higher Education Statistics Agency, HEFCE, government departments and other authorised users for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable.	Manual and electronic	Student Data Management; Tribal Student record system provider; Academic Support Services; NHS Health Education	HESA return database; Student records database; personal file	University and External	(see No. 15 and 24 above) and Article 9(1)(g) or 9(2)(j)
45.	To professional bodies where registration with that body is related to or a requirement of the student’s studies e.g. the NMC for nursing students.	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Central Services	Personal record in relevant file(s)	University and External	(see No. 34 above) and Article 9(1)(g) or 9(2)(j)
46.	To other bodies involved in the delivery of the course or programme e.g. affiliated colleges, for the purpose of statistical analysis and programme administration.	Manual and electronic	Student Data Management; Academic Support Services; Research Graduate School (research students)	Student records database; registration lists	University and External	(see No. 33 above) and Article 9(1)(a) or 9(1)(g)
47.	To University appointed (external and internal) healthcare providers for the assessment and provision of services to disabled students or students requiring access to healthcare services via disability services.	Manual and electronic	Student Services; Finance Student Data Management; Academic Support Services; Library; Research Graduate School (research students)	Applicants list; personal file; residents database; finance file; fire attendance lists; personal record in debts file; debt collection agency list	University and External	(see No. 10 above) and Article 9(1)(a) or 9(1)(h)
48.	Where required, to the police or other agencies in connection with particular programmes of study or prior to certain placements.	Manual and electronic	Student Data Management; Academic Support Services; relevant School	Student records database; personal record in relevant file(s)	University and External	(see No. 33 and 34 above) and Article 9(1)(a)

49.	To the University's external lawyers, insurers in respect of accidents occurring within the institution and external auditors.	Manual and electronic	Finance; Student Data Management; Central Services	personal record in relevant file(s)	University and External	(see No.43 above) and Article 9(1)(f)
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Also see the University Appropriate Policy Document available at: <https://www.bolton.ac.uk/about/governance/documents/#dataprotection>

**Article 6(1)(a)** Consent – on specific occasions the University will only process certain data if you consent e.g. on registration you only need to provide certain “special categories” of data if you agree to that.

**Article 6 (1)(b)** necessary for the performance of your student contract – on many occasions the University will process your data to enable it to meet its commitments to you e.g. those relating to teaching and assessment.

**Article 6 (1)(c)**, necessary to comply with a legal obligation – the University does have legal obligations to provide your personal data to others e.g. HESA.

**Article 6 (1)(d)** for the purpose of protecting the vital interest of yourself or another – sometimes in extreme circumstances the University will have to release information to protect your interests or the interests of others e.g. in medical emergencies.

**Article 6 (1)(e)** processing necessary for the performance of a task carried in the public interest – the University is an educational establishment and in particular its educational activity is conducted in a public interest (including your interest and the interest of others).

**Article 6 (1)(f)** processing is necessary for the purposes of the legitimate interest of the University or a third party subject to overridden interests of the data subject – the University (and sometimes third parties) has a broad legitimate interest in activities that connect to the activities and education of students. Subject to those interests not being overridden by the interests of fundamental rights and freedoms of students, it will pursue those interests. A good example of this legitimate interest would be its Alumni activities. Where Article 6(1)(f) is used the “legitimate interest” is generally the interest of the University (or third party) in providing or supporting the provision of higher education to its students.

**Article 22(2)(a)** automated decision making necessary for performance of a contract – the University will sometimes automate decisions relating to its services it is providing to you.

**Article 9(1)(a)** processing “special categories” of data where you have given consent – the University will process certain sensitive information about you with your consent.

**Article 9(1)(b)** processing “special categories” of data where necessary for the purpose of carrying out obligations in the field of employment and social security and social protection law.

**Article 9(1)(f)** processing “special categories” of data in connection with legal claims.

**Article 9(1)(g)** processing “special categories” of data where necessary for reasons of substantial public interest.

**Article 9(1)(h)** processing “special categories” of data where necessary for the purposes of medical or health care.

**Article 9(2)(j)** processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes

It is recognised that some of the above grounds will overlap and that the University could rely on multiple grounds justifying its lawful processing. The University also reserves the right to rely upon other grounds that are not referred to under Table A.