

Harper & Keele

VETERINARY SCHOOL

Vet School Student Privacy Notice

The Harper & Keele Veterinary School (“HKVetS”) is a joint veterinary school established by Harper Adams University (“Harper”) and the University of Keele (“Keele”) (together the “Universities”, “We”, “Us”).

Harper and Keele are Higher Education institutions in England and Wales. Both institutions, through HKVetS, work together to develop and deliver a programme of study leading to the Bachelor of Veterinary Medicine and Surgery degree award, interim awards or credit (“Programme”).

In order to admit students on to the Programme, deliver the Programme and support students during their time at HKVetS, We process and share personal data relating to all students and prospective students (applicants and enquirers) of HKVetS. We do this as joint “controllers” (as defined in the General Data Protection Regulation (GDPR)) . This means that we are responsible for deciding how We hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

This Privacy Notice applies to students, applicants and prospective student enquirers of HKVetS. It summarises how Harper and Keele collect and use personal data about you during your time and after you leave HKVetS. Harper and Keele as joint controllers are committed to protecting the privacy and security of your personal data and being transparent about how We collect and use such data.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

What is Data Protection?

Personal data, or personal information, means any information about an individual from which the person can be identified (“data subject”). It does not include any data where the identity has been removed (anonymous data). There are special categories of more sensitive personal data which require a higher level of protection.

During the course of your involvement with HKVetS you will be a data subject of both Harper and Keele. When we process personal data about you, we have to observe the requirements of data protection legislation (including the GDPR and the Data Protection Act 2018 (DPA)). The data protection legislation establishes a framework within which information about living individuals can be legally gathered, stored, used and disseminated.

Data protection legislation specifies that personal data must be:

Processed fairly and lawfully, in a transparent manner and only if certain conditions are met.

- Obtained for specified, explicit, legitimate and lawful purposes, and not used for purposes other than those for which it was gathered or which is incompatible with the purposes for which it was gathered.

□

- Adequate, relevant and not excessive in relation to the purposes for which it is processed.
- Accurate and where necessary kept up to date.
- Kept for no longer than is necessary for the purposes for which it is processed.
- Processed in accordance with individuals' rights.
- Kept secure.
- Not transferred outside the European Economic Area unless certain conditions are met.

Lawful Basis/ How We Use Personal Data

We are able to process your personal data lawfully on the following grounds:

1. It is necessary for the preparation of and/or performance of a contract;
2. The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Us as data controllers (the provision of Higher Education);
3. Because it is necessary for our or a third party's (eg. placement providers) legitimate interests;
4. To allow us to comply with our legal obligations;
5. To protect your or another person's vital interests;
6. Because you have given us your consent or, in the case of special category data, your explicit consent.

We collect, store, use and disclose certain data about you. We require this information for our normal business purposes, such as services to applicants, current students and alumni.

What Personal Data Do We Hold?

We will collect personal data about you throughout your dealings with us. We may also receive personal data about you from outside Harper or Keele such as information supplied by referees.

Examples of the personal data which We may hold about you include:

- Your name.
- Your postal and email address details.
- Details of your emergency contacts.
- Your date of birth.
- Your nationality.
- Your ethnic origins.
- Details of your family and other relationships provided to us by you.
- Your academic background and qualifications.
- Your academic record while at a student at Harper or Keele, including details of any degrees which you are awarded.
- Any disabilities which you have disclosed to us and any related reasonable adjustments.
- Medical information.
- Financial information and sponsorship details.
- Academic reference(s).
- Information about your interests.
- Your use of Harper and Keele facilities.
- Any disciplinary action taken against you or grievance-related information.
- Information relating to extenuating circumstances.
- CCTV footage.

□

- Immigration information (including copies of passports, visas etc.).

Personal Data about you will be gathered and held in both digital and paper form.

Some of the information We collect (such as your ethnic origins, medical information, information about disabilities and SU membership) is classed as “special category” data under the GDPR or “sensitive processing” under the DPA. This means that it is subject to extra legal protection, and we have to meet an additional set of conditions in order use the data fairly and lawfully. For further information about sensitive processing, see Data Protection Policies linked above and the “How Do We Use Sensitive Personal Data?” section below.

Disclosure of Criminal Convictions:

We require applicants and students to declare relevant unspent criminal convictions after an offer has been accepted by you. Harper and Keele will use this information in accordance with HKVetS’s Criminal Convictions Procedure in order to:

- i) To carry out a risk assessment of whether an applicant poses a significant risk; ii) To consider the specific professional or statutory requirements as stated by the RCVS.

How Do We Use Personal Data?

Personal data supplied to Us may be used in a number of ways, for example;

- To process your application to the HKVetS and to decide whether to offer you a place;
- To manage your registration with Us in accordance with our policies and procedures;
- To deliver and administer your education in line with the contract we have with you and the rules and regulations of Harper and Keele;
- To administer your studies and record academic achievements (e.g. your Programme module, examinations and assessments, and the publication of pass lists and graduation programmes);
- To assist in pastoral and welfare needs (e.g. counselling services and services to students with disabilities);
- To administer financial aspects of your registration as a student of Harper and Keele (e.g. payment of fees, debt collection);
- To manage the Universities’ facilities, such as accommodation, IT, sport, social events, careers, the libraries and parking;
- To enable you to access the facilities and support offered by Harper and Keele’s respective Student Unions;
- To produce management statistics and to conduct research into the effectiveness of our programmes of study and for statutory reporting purposes;
- To communicate effectively with you by post, email and phone, including the distribution of relevant newsletters and circulars regarding information related to your course, your use of the Universities’ services and facilities, and relevant information which is related to your student life;
To fulfil and monitor our equal opportunities policies (e.g. compliance with the Equality Act 2010 and health and safety legislation);
- To fulfil and monitor our responsibilities and obligations under immigration legislation.
- To operate security (including CCTV), governance, disciplinary (including plagiarism and academic misconduct), complaint, audit and quality assurance processes and arrangements;

□

- For disciplinary purposes;
- For internal and external audits, and quality assurance exercises;
- To identify ways to enhance learning, teaching, assessment and the broader student experience;
- For administration of scholarships and placements;
- To fulfil the duty of care we owe to all our students, staff, clients, and visitors;
- To enable us to contact others in the event of an emergency;
- To help determine your eligibility for Council Tax Exemption and voter registration;
- For marketing and alumni relations purposes. When you leave the Universities, we will use your personal data to facilitate an ongoing relationship with you – this includes fundraising, promotion of alumni events and reunions, engagement with alumni mentoring and volunteering.
- For fundraising purposes such as appeals, events or opportunities to support the activities of Harper and/or Keele.
- To enable your participation at events – including, for example, graduation.

Please also note:

- Harper and Keele use lecture capture technology to record teaching. As a result, anything you say may be recorded whilst attending lectures, seminars and other teaching sessions depending on your proximity to the microphone. For the policy around the use of recordings please see the HKVetS key information page: <https://www.harperkeelelevetschool.ac.uk/study/key-info/>.
- CCTV is in use across both campuses and there are signs located throughout the campuses informing students, staff and visitors of its presence. It is used to prevent and detect crime and antisocial behaviour, ensure a safe environment for staff, students and visitors, assist in the overall management of the Universities' campuses, and to reduce the fear of crime and promote a feeling of safety. Security staff also have the use of body worn video. As this may be intrusive in its use, it will only be used in circumstances where it is necessary and proportionate to do so. Appropriate notices informing of its use are worn by users and if appropriate verbal warnings will also be given prior to its use. Subject access requests may be made for CCTV images to the respective Data Protection Officers at Harper and Keele.

When you apply to Us we record your data. When you enrol we create a record with your name, and unique identity number. A digital photograph of you, which is used to produce your ID, and for security and identification purposes, including identity badge, exam entry and access around the campuses. It will also be used by staff at the Universities for identifying students within teaching groups.

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.

2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Failure to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our students).

How Do We Use Sensitive Personal Data?

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit consent.
2. Where it is required in the public interest, such as where we are complying with our legal obligations, for equal opportunities monitoring, for preventing or detecting unlawful acts, protecting the public against dishonesty, preventing fraud, counselling, or the provision of insurance.
3. Where it is needed for preventative or occupational medicine, or for public health reasons and subject to appropriate confidentiality safeguards.

Less commonly, We may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent; or where you have already made the information public.

We may use sensitive information to assess and manage:

- a leave of absence;
- an exceptional circumstance;
- student complaints, disciplinary cases or appeals.

We will use information about your physical or mental health, or disability status, to ensure your health and safety and to assess your fitness to work/study (e.g. for placements), and to provide appropriate accommodation, study or work adjustments, support or assistance.

We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful anonymous equal opportunity monitoring and reporting.

We will use details about your health or disability status to assess and administer reasonable adjustment requirements for teaching and examinations.

All undergraduate students are required to complete Intra-Mural Rotations (IMR). As such the school may disclose their personal data, including sensitive personal data such as any disability information they may need to be aware of, to placement providers for the purposes of administering the rotations. The data is shared in connection with the performance of your student contract or is considered by the school to be an educational activity, forming part of our academic and educational mission. We will therefore disclose this data to the placement provider because it is necessary for the performance of our tasks carried out in the public interest.

We may use your disability status to assess whether you may be eligible for one of our scholarships.

Who Has Access To Personal Data?

Harper and Keele, in conjunction with HKVetS may disclose certain personal information to external organisations to carry out its legal responsibilities, functions and manage our operations or because you asked us to. Some of this is anonymised or aggregated data. These third parties may include but are not limited to:

- Royal College of Veterinary Surgeons (RCVS), the regulator for veterinary education. We will share your information with the RCVS to register you after graduation to practise as a veterinary practitioner. We will also share your information with the RCVS in order to assist it in its statutory functions.
- Statutory bodies, such as The Higher Education Statistics Authority (HESA). Further information is available from HESA's web site.
- Universities and Colleges Admissions Service (UCAS), Student Loans Company (SLC) and other loan and grant providers; Office for Students (OFS); Office for Fair Access (OFFA); Office of the Independent Adjudicator (OIA); the organisation(s) running the National Student Survey and other student and leaver surveys;
- Organisations running the National Student Survey and Post Graduate Outcomes
- Relevant Government Departments (e.g. Home Office, including UKVisas and Immigration, Foreign and Commonwealth Office, Department of Health. Department of Education);
- External examiners and assessors, and external individuals involved in relevant University committees or procedures;
- Relevant executive agencies or non-departmental public bodies (e.g. HM Revenue and Customs, Health and Safety Executive);
- Employers and other educational providers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance). We will seek your permission for any disclosure;
- Service providers and professional advisors;
- Local authorities to assist with the administration of students' exemption from Council Tax and to administer Voter registration (where relevant);
- Insurance providers for accommodation insurance;
- External accommodation providers (where student accommodation is provided on our behalf);
- Harper Adams Students' Union and Keele University Students' Union; □ Debt collection agencies working on behalf of each of the Universities.
- Law enforcement agencies such as the police or relevant authorities dealing with emergency situations (only as required or appropriate and in line with data protection legislation).

- Third party service providers such as Overt Software Limited, Gecko Limited, Belmont Services Limited, Bulk email service providers, Google, Microsoft, Antiplagiarism providers (Turnitin), Student Records Systems, Lecture and Examination timetabling systems, Accommodation systems and other cloud-based systems supporting the Universities' services.
- Potential employers and other educational institutions requesting a reference or confirming the award of a current or past student either directly or via the Higher Education Degree Datacheck (HEDD).

We may also disclose your data to other third parties not listed above on a case-by-case basis. Disclosures will be made in full accordance with the data protection legislation and only where necessary. Consent will be sought from you where appropriate and you will be told about such disclosures unless exceptional circumstances apply.

How We Protect Personal Data?

We take the security of your personal data seriously. We have internal policies and controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For more information, please see the respective Data Protection Policies linked above.

How Long Will We Keep Your Personal Data?

We will only keep your personal data for as long as is necessary for the purpose for which it is processed.

Personal data is processed and stored in line with respective Universities' retention schedules which set out how long different categories of personal data should be held by the Universities. Retention Schedules can be found at:

- Harper Adams University – [here](#)
- University of Keele – [here](#)

Data subject's rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your personal data on request;
- request Us to change incorrect or incomplete personal data;
- request Us to delete or stop processing your personal data, for example where the personal data is no longer necessary for the purposes of processing;
- object to the processing of your personal data; and
- withdraw your consent at any time, where we have requested and obtained your consent.

We must allow portability of your personal data, if we have obtained your consent or are relying on a contractual obligation.

Further information about your rights can be found on the Information Commissioner's Office (ICO)'s website - <https://ico.org.uk/>. You may also contact the relevant Data Protection Officer for further information (details below).

Contact Details

Further details relating to our respective data protection policies and contact details can be found below:

Data Controller	Links to Data Protection Policies	Contact details for Data Protection Officer
Harper Adams University	Data Protection Policy here	dpo@harper-adams.ac.uk
University of Keele	Data Protection Policy here	dpo@keele.ac.uk

If you have any questions or concerns about this Privacy Notice (and any related Privacy Notice) or how your personal data is processed, then please contact the relevant Data Protection Officer as detailed above.

If We are not able to resolve the issue to your satisfaction, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues

ICO contact details: www.ico.org.uk

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.