

## PRIVACY NOTICE for ACADEMIC REGISTRY

### PRIVACY NOTICE DETAILS:

Date of approval	04 September 2018 (published in the meantime as subject to formal approval by the Executive Group)
Approving body	Executive Group
Supersedes	n/a
Date of EIA	n/a
Date of next review	<i>See departmental schedule</i>
Authors	Academic Registrar, Head of Academic Registry & DPO.
Responsible Executive Group area	Registrar and Secretary
Related policies and documents	Data Protection Policy
Benchmarking	n/a

## PRIVACY NOTICE FOR ACADEMIC REGISTRY

### General Data Protection Regulation (GDPR) 2016 and Data Protection Act 2018

#### Purpose

This Privacy Notice is applicable to all potential students, enrolled students and former students of Glasgow School of Art (GSA) and outlines what personal data Academic Registry hold about you, how it is processed and who we share it with. It also explains your rights as a data subject.

GSA's Data Protection Officer is Tom McDonnell, [t.mcdonnell@gsa.ac.uk](mailto:t.mcdonnell@gsa.ac.uk).

If you have any questions relating to our use of your personal data, these should be referred in the first instance to our Academic Registry by emailing [registry@gsa.ac.uk](mailto:registry@gsa.ac.uk).

You have the right to lodge a formal complaint against GSA regarding data protection issues with the Information Commissioner's Office (<https://ico.org.uk/concerns/>).

## 1. POTENTIAL STUDENTS

### What personal data do we hold about you?

In order for Academic Registry to respond to your enquiries and to process your application to study with us, we need to collect, hold and use your personal data.

If you make an enquiry about studying at GSA, the personal data collected is required to respond to your query.

Personal data collected for this purpose may include:

- Name, Email address and phone number;
- Any information you choose to share with us, including sensitive personal information (referred to as special category data), that is relevant to your enquiry. For example, your qualifications, nationality, health or welfare information.

If you apply to study with us, Academic Registry will collect the personal data required in order to communicate with you and assess your application for admission to study at GSA. For example, Academic Registry may use your personal data to answer any queries you have about studying at GSA, to administer your application for admission; establish the correct fee status; to inform UKVI in relation to the sponsorship of Tier 4 students; the compilation of admissions statistics for both internal use and reporting to statutory and regulatory bodies.

Personal data collected for this purpose will include:

- Full Name; date of birth; postal and email addresses; phone numbers
- Application ID number
- UCAS Personal ID (if applicable)
- Gender
- Nationality
- Country of Birth
- Country of Domicile
- Qualifications, achieved and pending
- Reference
- Personal Statement
- Employment details
- Portfolio images, if required
- Passport and visa information, if required
- Any other information relevant to your application

Academic Registry may also collect Special Category data. This will be used to accommodate any special needs you may have in relation to your application to study at GSA. Examples of Special Category data:

- Ethnicity
- Religious beliefs
- Equality information such as religious beliefs, gender identity, sexual orientation.

### **Legal Basis for holding your personal data**

For the personal data Academic Registry hold and process about you, GSA by law, has to provide you with the legal basis under which it is being processed. This can be based on Consent, Performance of Contract, Legal Obligation, Public Interest, Vital Interest or Legitimate Interest. We rely on the following legal bases for the purposes described:

#### **I. Legitimate Interest**

If you make an enquiry about studying at GSA, it is in our legitimate interest that your personal data is processed in order to respond and give you an answer to your question.

#### **II. Performance of Contract**

If you submit an application to study at GSA, your personal data is processed in order to assess whether you meet the admissions criteria and can be made an offer of a place, which if accepted, you would enter into a contract with GSA. If you do not provide GSA with information that is necessary for GSA to assess whether you meet the admission criteria and can be made an offer and/or information that we require to enter into a contract with you, we may not be able to enter into a contract with you and your application will be rejected.

#### **III. Consent**

Where Academic Registry require your consent to process your personal data, you will be asked to complete and return Data Subject Consent form. Where this involves special category of data, the consent we will seek will be explicit.

If you give your consent for us to process your personal data, you can withdraw this consent in whole or part at any time. If you wish to withdraw your consent you will be asked to complete and return a Data Subject Consent Withdrawal form. Academic Registry will also explain the consequences of withdrawing your consent in any particular case. Please note withdrawing your consent does not affect the lawfulness of the processing up to the point of withdrawal.

#### **IV. Processing is necessary for Legal Claims**

In some cases, we may require to process your personal data if necessary for the establishment, exercise or defence of legal claims.

#### **Sharing of your personal data internally**

When submitting an enquiry or an application to study at GSA, Academic Registry will share your personal data with other departments across GSA in order to fulfil our obligations to you and will be processed according to the legal bases listed above.

Examples of departments that Academic Registry will share your personal data with and for what purpose:

- The Academic School and Programme team in the relevant subject area to which you have applied, in order for them to assess your portfolio and invite you to interview, if applicable.
- The IT Department in order to create your account required to access the application form.
- The Finance Office to allow for payment of a deposit to secure your place or payment of tuition fees prior to enrolling on your programme.
- The Accommodation Office, to allow you to register and apply for campus accommodation.
- Student Support if you declare a disability on your UCAS application form or if you give your explicit consent for us to share your data with them.
- Marketing and Recruitment Office in order to keep you informed of events at GSA or for recruitment purposes.

GSA strives to ensure that all personal data remains current and accurate. If you become aware of any incorrect information held by us, you should request that this is rectified by contacting Academic Registry.

#### **Sharing of personal data with other organisations**

In order to fulfil our statutory or regulatory obligations, any personal data Academic Registry hold about you may be provided, without explicit consent, to organisations including but not limited to Higher Education Statistics Agency (HESA) and the United Kingdom Visa and Immigration Authorities; Student Loans Company, and the U.S Department of Education for the purpose of Federal Loans.

## **Sources of data**

Academic Registry receives personal data in several ways but it is primarily obtained direct from you, the data subject; information you've given to other members of GSA staff or from UCAS via electronic transfer. For information on how UCAS hold and use your personal data, please refer to their own privacy notice at [www.ucas.com](http://www.ucas.com).

## **2. ENROLLED STUDENTS**

### **What personal data do we hold about you?**

All students confirm the personal data Academic Registry hold when enrolling each year. This may include what is known as Special Category data, otherwise referred to as sensitive personal information.

In addition, during the course of your studies, your student record will be updated to include the results of your academic progress while you are a studying at GSA.

Personal data held in your student record will include:

- Full Name; date of birth; postal and email addresses; phone numbers
- Nationality
- Country of Birth
- Country of Domicile
- Previous qualifications
- Level of previous study
- Fee Category
- Student ID number
- Student ID photograph
- Programme of study
- Financial information relating to your source of funding
- Passport and visa information for students studying in the UK on a Tier 4 visa
- Academic results and progression details
- Any other relevant data relating to your academic study

Special Category data will include:

- Ethnicity
- Religious Beliefs
- Equality information such as religious beliefs, gender identity, sexual orientation.

Your personal data will be used by Academic Registry, for example, to keep your student record accurate; record information related to assessment and progression, including marks, degree classifications, academic misconduct, good cause and appeals; arrangements for graduation; the compilation of student statistics for both internal use and reporting to statutory and regulatory bodies.

## **Legal Basis for processing your personal data**

For the personal data Academic Registry hold and process about you, GSA by law, has to provide you with the legal basis under which it is being processed. This can be based on Consent, Performance of Contract, Legal Obligation, Public Interest, Vital Interest or Legitimate Interest. We rely on the following legal bases for the principal purposes described:

### **I. Performance of Contract**

The majority of the processing activity stated above will be necessary to fulfil your and GSA's rights and obligations under your contract with GSA. Each academic year Academic Registry will ask you to enrol and accept the current Enrolment Terms and Conditions, at which point you will be entering into, or renewing your contract with GSA. Students will also accept the Terms and Conditions of Graduation when registering to graduate. If you do not provide GSA with information that is necessary for GSA to renew your contract with us, we may not be able to allow you to continue your studies at GSA.

### **II. Consent**

In cases where GSA cannot rely on fulfilment of Contract, GSA will seek your consent and where the processing involves special category of data, your explicit consent. If Academic Registry need your consent for a specific purpose, such as a potential employer reference request or to process special category data about you, you will be asked to complete and return Data Subject Consent form before your data will be shared with a third party.

If you give your consent for Academic Registry to process your personal data, you can withdraw this consent in whole or part at any time. If you wish to withdraw your consent you will be asked to complete and return a Data Subject Consent Withdrawal form. Academic Registry will also explain the consequences of withdrawing your consent in any particular case. Please note withdrawing your consent does not affect the lawfulness of the processing up to the point of withdrawal.

### **III. Processing is necessary for Legal Claims**

In some cases, we may require to process your personal data if necessary for the establishment, exercise or defence of legal claims.

### **V. Complying with a Legal Obligation**

GSA may require to process personal data of its students in order to comply with a legal obligation e.g. in relation to equality and diversity legislation.

### **VI. Legitimate Interest**

It is GSA's legitimate interest to inform students about services GSA could offer to such students but which are not necessary for the student contract.

### **Sharing your personal data internally**

As an enrolled student at GSA, Academic Registry will share your personal data with other departments across GSA in order to fulfil our obligations to you and will be processed according to the legal bases listed above.

Examples of departments that Academic Registry will share your personal data with and for what purpose:

- Your Academic School in relation to all aspects of learning & teaching, assessment and for the assurance of academic rigour.
- Your Academic School in relation to membership and accreditation of professional and statutory regulatory bodies such as RIBA.
- Your Academic School in relation to collaboration with educational partners and work placement providers, as it relates to your progression or attendance on your programme.
- The Library, so you can access the library and borrow books.
- Finance Office, in relation to payment of your tuition fees.
- IT Department, in order to give you access to the GSA network and your student email account.
- The VLE team, in order to give you relevant access to Canvas.
- Student Support, if you declare a disability at enrolment or you give your consent for us to share your data with them.
- The Estates Department in order to activate your student ID card and allow you access to campus buildings.
- Research Office for learning & teaching and funding purposes (PhD students only)
- Marketing Office to communicate important updates from Academic Registry.
- Alumni Office, normally at the point of you leaving GSA, in order that they can keep in contact with you, if you give us your consent to do so.

### **Sharing of personal data with other organisations**

In order to fulfil our statutory or regulatory obligations, any personal data Academic Registry hold about you may be provided, without explicit consent, to organisations including but not limited to:

- The University of Glasgow
  - As the accrediting institution for Glasgow School of Art, GSA will share relevant data as necessary to allow for the issuing of degree awards and access to facilities.
  - To become a member of the General Council at The University of Glasgow
- Higher Education Statistics Agency (HESA)
  - It is a statutory obligation for GSA to provide data, including special category data, to HESA. The data is provided on the understanding that any subsequent publication of data leaves the data subjects totally anonymous. Full details on how HESA use student data can be found on their website at <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

- Sponsors
  - Personal data will be shared with relevant sponsors (including employers or the Student Loans Company) where a contract exists and in accordance with the terms of that contract.
- The Scottish Funding Council and other agents
  - The Scottish Funding Council, the U.S. Department for Education, and other agents including the Quality Assurance Agency (QAA).
- UK agencies with duties relating to the prevention and detection of crime, collection of a tax or duty or safeguarding national security
  - In order to allow for the assessment and collection/paying Council Tax, Benefits or Tax, to aid the Police, UK Visa and Immigration Agency or the Foreign and Commonwealth Office.

### **Sources of data**

Academic Registry receive personal data in several ways but primarily obtained directly from you (the data subject); provided by other members of GSA staff; or external partners where we have relevant agreements in place.

## **3. FORMER STUDENTS**

After you have completed or withdrawn from your studies at GSA, Academic Registry will retain some of your personal data related to your time as a student.

### **What personal data do we hold about you?**

What we hold will be determined by what type of data it is and the length of time that has passed since you were last enrolled as a student. The Academic Registry Record Retention Schedule states what data is held and how long we hold it for. There is some data that is kept indefinitely and this includes:

- Name and date of birth
- Student ID number
- Programme and courses of study
- Start and end date of study
- Duration of study
- Exam results and award details

### **Legal Basis for holding your personal data**

For the personal data Academic Registry hold and process about you, GSA by law, has to provide you with the legal basis under which it is being processed. This can be based on Consent, Performance of Contract, Legal Obligation, Public Interest, Vital Interest or Legitimate Interest. We will rely on the following legal bases for the primary purposes described:

#### **I. Performance of Contract**

When leaving GSA, Academic Registry will continue to hold your personal data in order to fulfil continued obligations to you as part of the contract you have with us.

## **II. Consent**

GSA will require your consent to provide you a third party with transcripts/European Diploma Supplement or provide confirmation of enrolment and any achieved award to a third party.

Where Academic Registry require your consent to process your personal data, you will be asked to complete and return Data Subject Consent form. Where this involves special category of data, the consent we will seek will be explicit.

If you give your consent for us to process your personal data, you can withdraw this consent in whole or part at any time. If you wish to withdraw your consent you will be asked to complete and return a Data Subject Consent Withdrawal form. Academic Registry will also explain the consequences of withdrawing your consent in any particular case. Please note withdrawing your consent does not affect the lawfulness of the processing up to the point of withdrawal.

## **III. Processing is necessary for Legal Claims**

In some cases, we may require to process your personal data if necessary for the establishment, exercise or defence of legal claims.

### **Sharing your personal data internally**

As a former student of GSA, Academic Registry will share your personal data with other departments across GSA in order to fulfil our obligations to you and will be processed according to the legal bases listed above.

### **Sharing of personal data with other organisations**

In order to fulfil our statutory or regulatory obligations, any personal data Academic Registry hold about you may be provided, without explicit consent, to organisations including but not limited to The University of Glasgow, as the accrediting institution for GSA awards or the Higher Education Statistics Agency (HESA). Data provided to HESA is done on the understanding that any subsequent publication of data leaves the data subject purely anonymous. Full details on how HESA use student data can be found on their website at <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

### **Sources of data**

The personal data Academic Registry holds on former students remains static from the point you are no longer a student at GSA. We do not process it unless requested by yourself or by a third party (with your consent).

## **4. GENERAL**

### **What you are responsible for?**

When you apply, and at enrolment you are asked to check that the data Academic Registry holds about you is current and accurate. It is your responsibility to ensure you inform us of

subsequent changes, such as a change of name or address. You can do this by contacting Academic Registry either by phone, email or in person.

When you apply or enrol, you are asked to provide details of your next of kin that can be contacted if an emergency situation arose. If it is necessary to contact your next of kin, the only details disclosed will relate to immediate health or safety concerns. When you provide next of kin details, it is your responsibility to inform them that they are your nominated contact for this purpose and you must inform us of any change to this contact. Our legal basis for processing next of kin details is that it is in our legitimate interest to retain such information in cases of emergency.

### **Transfers outside the EEA**

In some instances, (except for applicants), Academic Registry may transfer your personal data to third parties located in other countries, including some outside of the European Economic Area. All instances of overseas transfers of personal data are subject to appropriate technical safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the data and full compliance with legislative and regulatory requirements.

### **Retention of your personal data**

Academic Registry will retain your personal data only as long as necessary for its purposes as set out in our Student Records Retention Schedule. Please note, however, that even after termination of your relationship with GSA we may still need to retain your personal data to satisfy obligations to keep certain records for particular periods as applicable by law.

### **Profiling**

GSA does not use profiling or automation to make any decisions relating to your academic progression.

### **Security**

GSA will ensure that all personal data which we hold is kept securely and attempt to ensure that it is not disclosed to any unauthorised third party, accidentally, carelessly, negligently or deliberately.

### **Your rights**

You have certain rights as an individual under data protection law. These are set out below. In relation to most rights, we will ask you for personal data to confirm your identity and, where applicable, to help us search your personal data. Except in rare cases we will respond to you within one month after we have received any request (including any identification documents requested). You have the right to:

- Withdraw consent. If we are relying on your consent, you can withdraw your consent at any time, at which point we shall stop processing your personal data in that way. Please note this does not affect the legality of our processing up to the date of your withdrawal of consent.
- Restrict or rectify your personal data. You can seek to restrict our processing of your personal data or ask us to rectify any personal data we hold about you.

- Object to processing of your personal data. You can object to us processing your personal data where we are relying on legitimate interest and we will cease processing for the purpose you object to. An exception to this would be where we have compelling legitimate grounds for processing which override your interests, rights and freedoms or where it is necessary for the establishment, exercise or defence of legal claims. You can also object to our processing your personal data for direct marketing, after which we will stop immediately.
- Make a complaint. You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you think that we have infringed your rights. You can find more information about reporting a matter to the ICO at the following link: <https://ico.org.uk/>
- Access personal data held by us about you.
- Request a copy of your personal data. In certain circumstances you have the right to ask us to provide you with your personal data in a structured, commonly used and machine-readable format to allow you (or us on your behalf) to transmit this information to another party. More information can be found at <https://ico.org.uk>
- Request your personal data is erased. In certain circumstances you have the right to ask us to erase the personal data we hold about you. Such circumstances include (a) where we no longer need your personal data for the purposes set out above; (b) if you withdraw your consent to our processing; (c) if you object to our processing based on our legitimate interest and we have no overriding legitimate grounds to continue processing your personal data; (d) if we process the data unlawfully; or (e) where the personal data has to be erased to comply with legal obligation to which we are subject. We will consider any such request in line with GDPR. Please note this is not an absolute right and there may be circumstances where we choose not to delete all of the personal data we hold about you. More information about your right of erasure can be found at <https://ico.org.uk>

To exercise these rights please contact [registry@gsa.ac.uk](mailto:registry@gsa.ac.uk) in the first instance.

### **Changes to this Privacy Notice**

If Academic Registry make any changes to this Privacy Notice you will be informed either by placing an alert on the GSA website or by corresponding with you directly.