

## **Privacy Notice – Lifelong Learning/CPD Students**

If you are studying for a full degree programme with the University of Manchester, please refer to the [Registered Students Privacy Notice](#)

### **1. Introduction**

This notice provides information about the use of personal information whilst you are enrolled on a course within the University of Manchester's online platform(s).

### **2. What is personal data (also often referred to as personal information)?**

Personal data means any information which relates to or identifies you as an individual and includes opinions about you or information which may not explicitly identify you (e.g. where your name has been removed) but which nevertheless does identify you if it is combined with other information that is readily available.

### **3. How does this notice relate to other information about data protection?**

When you applied to become a student you were told how the University would use your personal information to process your application and for related purposes in the [Enquirer, Applicant and Offer-holder Privacy Notice](#). This notice provides you with the details about the uses we make of your personal information while you are studying with the University. In addition to the information published here, when you use specific additional or optional services and facilities offered by the University, you will be told about any other uses of your personal information.

### **4. Who will process my personal information?**

This notice explains how the University of Manchester will hold and process your personal information whilst you are studying with the University.

### **5. How do we obtain your personal data?**

- 5.1. We obtain personal data from you when you disclose this to us, including during account set-up and during the course of your relationship with us when accessing or using any of our courses and services within the University of Manchester's online platform(s).
- 5.2. On rare occasions we may also receive personal information about you from other third party organisations that have relationships with the University such as the Police, Manchester City Council, or Health Assured the provider of our support telephone line.
- 5.3. We may also obtain information from your employer e.g. NHS

## **6. What personal information will you process?**

The University needs to collect, maintain and use personal data relating to or about you. This includes:

- 6.1. Personal contact details such as name, title, address, telephone numbers, and personal email addresses
- 6.2. Date of birth
- 6.3. Next of kin and emergency contact information
- 6.4. Course(s) studied
- 6.5. Records of payments made to the University
- 6.6. Bank account details where required for the collection of fees and charges.
- 6.7. Information about your assessments and results
- 6.8. National Insurance number where required for Disclosure and Barring Services checks
- 6.9. Where relevant a copy of passport, visa and other right to study documentation
- 6.10. A record of the details you provided during registration and any supporting documents requested as part of your set-up and enrolment onto courses
- 6.11. Information relating to your health including about a disability collected as part of registration (please see section 10 for more information about how we handle this information)
- 6.12. Records about you and your studies at Manchester or at another institution
- 6.13. Records about your use of the academic and non-academic facilities and services that we offer including details of your engagement with your programme
- 6.14. CCTV footage and other information obtained through electronic means such as student (swipe) card records when you are on campus
- 6.15. Information about your use of our information and communications systems
- 6.16. Photographs taken at University events. You will be informed separately where photographs are taken at events and consent will be sought before an image identifying you is re-used

## **7. What is the purpose of the processing under data protection law?**

We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition. Most commonly, we will use your personal information in the following circumstances where it is:

- necessary for the performance of our contractual obligations with you (e.g. to manage your student experience and welfare while you study at the University of Manchester)
- necessary for compliance with a legal obligation (e.g. UK equal opportunities monitoring)
- necessary for the performance of tasks we carry out in the public interest (e.g. teaching and research)
- necessary for the pursuit of the legitimate interests of the University or an external organisation (e.g. to enable your access to external services)

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's interests)

If we require your specific and informed consent for any additional uses of your personal information not referred to in this notice, we will collect this from you separately and explain why it is we need this. You can withdraw your consent at any time.

We might seek additional consent from you when we are taking photographs and want to use the images online or when we need to use or share more sensitive information about you. This includes where we want to share sensitive information with your emergency contact in accordance with the Student Emergency Contact Statement.

We will not use your personal information to carry out any wholly automated decision-making that affects you.

## **8. Can you provide examples of processing?**

The University will process your personal information, including where applicable your image, for a range of contractual, statutory or public interest purposes, including the following:

- 8.1. To deliver and administer your education, record the details of your studies and determine/confirm your academic achievements (e.g. results, prizes)
- 8.2. To administer student related policies and procedures including appeals, complaints, grievances, disciplinary matters (including plagiarism and academic misconduct and Fitness to Practise, Fitness to Study, Health and Conduct Committee), and matters related to health and welfare,

- 8.3. To operate security, governance, audit and quality assurance processes and arrangements
- 8.4. To administer the financial aspects of your relationship with us and any funders, including international funders
- 8.5. To deliver facilities or services to you (e.g. academic advising and academic support) to help to achieve your academic potential and support your wellbeing
- 8.6. To support your training, medical, safety, welfare and religious requirements
- 8.7. To compile statistics and conduct research for internal and statutory reporting purposes, for business improvement, and to support changes to service delivery
- 8.8. To fulfil and monitor our responsibilities under UK equalities, immigration and public safety legislation
- 8.9. To monitor the attendance of students in accordance with University policy and Regulation XX, and where relevant for UKVI Tier 4 Visa compliance.
- 8.10. To enable us to contact others in the event of an emergency, including your designated emergency contacts (we will assume that you have checked with the individuals before you supply their contact details to us) in line with the [Student Emergency Contact statement](#)
- 8.11. To film and record certain teaching activities. Please note that students are not the subject of these recordings. Further information available from: <https://www.mypodcasts.manchester.ac.uk/>
- 8.12. To record other remote teaching and learning interactions utilising online meeting tools. You will be provided with further information about these recordings at the time they are made
- 8.13. To enable your participation at events
- 8.14. To communicate effectively with you by post, email, and phone including the distribution of relevant circulars sent to your email account containing information considered necessary to support your learning experience. Where appropriate you will be given the opportunity to opt-out of receiving some communications from us
- 8.15. We may also contact you by social media channels and applications where you have joined an official University social network or initiated contact with in this way
- 8.16. To enable us to tailor content and services for specific groups of students (e.g. those studying a particular programme) across our platform.
- 8.17. To comply with our obligations to funders and sponsors (including our disclosure obligations under their terms and conditions and policies)

## **9. What constitutes “Special Category Data”?**

The University will also process some information about you that is considered more sensitive and this is referred to as ‘special category’ personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health - including mental health and disability information, or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK any personal information relating to criminal convictions and offences also requires additional protections.

## **10. How will you process my Special Category and criminal conviction personal information?**

We will only process special category personal information in certain situations in accordance with the law. For example, we can do so if we have your explicit consent and, in some circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do, we will provide you with full details for the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent, which you can withdraw at any time. Where you provide sensitive information such as details about disability/SLD/health conditions at registration, or at another time in order to receive an additional service, such as occupational health, counselling or register with the Disability Advisory and Support Service (DASS) you will be given further details about the use of this data.

We do not need your consent to process special category personal data when we are processing it for the following purposes as these satisfy another legal justification:

- where we need to carry out our legal obligations
- where you have made the data public
- where it is necessary to protect your vital interests or those of another person and where you/they are physically or legally incapable of giving consent. This would be in an emergency situation where your health, wellbeing or welfare was at risk
- where processing is necessary for the establishment, exercise or defence of legal claim
- where the processing is necessary in the public interest for the purposes of protecting the public

We will use your special category personal information in the following ways:

- 10.1. your race, disability status, national or ethnic origin, religious, philosophical or moral beliefs or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

- 10.2. for certain courses of study, placements and work opportunities information about past criminal convictions and offences will be processed where this is relevant because you are working with children or vulnerable adults, and/or because of fitness to practise or fitness to train requirements in certain regulated professions. In these circumstances a DBS check may be required, where this is the case you will be informed separately, in addition if you are studying to become a doctor we will ask you annually whether you have had any criminal convictions/activity in the previous year and keep a record of your response
- 10.3. for courses other than those above, information relating to 'unspent' criminal convictions is collected once an offer has been accepted. This is to ensure that appropriate risk assessments can be carried out. A record of your response to this question is maintained and is updated if the University is made aware that you have been convicted of an offence during your time as a registered student
- 10.4. information about your physical health or mental health or disability status to ensure your health and safety whilst studying with the University and to assess your fitness to study, travel, take part in placements, provide appropriate reasonable adjustments and where you request it, to make decisions relating to applications for mitigating or changed circumstances or other appeals
- 10.5. where you choose to provide the University with sensitive information about yourself for the purposes of student support we will use this to work with you and provide the support you requested. On occasion, where we receive information about you relating to a concern from a third party we will also use this to provide you with appropriate support which may include taking action to safeguard you or someone else.

## **11. Who will my personal information be shared with?**

As described above, your personal information is shared with relevant University of Manchester staff as required. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations or third parties, including the following:

- 11.1. Your funders and/or sponsors (e.g., as relevant, the UK Student Loans Company, other funders or sponsors, funders based in other countries including those outside the UK, Research and Innovation, Research Councils, Teach First, the funders of any awards or prizes)
- 11.2. The providers of any external/collaborative learning, training, work and other placements (including schools involved in the provision of teacher training), or fieldwork opportunities e.g. affiliated institutions, exchange partners, including to providers based overseas
- 11.3. The relevant University of Manchester Worldwide global centre if you are studying a course with learning based there
- 11.4. External assessors, and external individuals involved in relevant University committees or procedures

- 11.5. Relevant UK Government Departments (e.g. Department for Education, Home Office (including UK Visas and Immigration), Foreign and Commonwealth Office, Department of Health) and other public bodies (e.g. HM Revenue and Customs, the Health and Safety Executive) for the assessment of student status for immigration and visa purposes; for the purposes of gathering census or other information including the assessment of fee
- 11.6. Relevant Higher Education bodies (e.g. Office for Students, UK Research and Innovation, Universities and Colleges Admissions Service, Office of the Independent Adjudicator)
- 11.7. Any other relevant professional or statutory regulatory bodies
- 11.8. If you are a medical student, in order to comply with the General Medical Council's (GMC) "Tomorrow's Doctors" requirements, or if you are a student within the School of Health Sciences, Medical Sciences or Biological Sciences, your student record, information pertinent to your educational achievements and to your fitness to practise will be shared with base hospitals, placements, training providers, education commissioning partners, employers, other regulatory organisations and other medical schools
- 11.9. Where you study at a University of Manchester Worldwide global centre personal information may be disclosed to international governmental/regulatory bodies based in that country (e.g. KHDA in Dubai, Committee for Private Education in Singapore)
- 11.10. On occasion and where necessary, the police and other law enforcement agencies.
- 11.11. Where necessary the emergency services and your designated emergency contact where there is an urgent requirement to share information e.g. illness, serious injury, bereavement or the suspicion/risk of this in accordance with the Student Emergency Contact statement
- 11.12. On occasion and where necessary, University auditors and, where required, other statutory bodies acting in an audit capacity e.g. OFSTED
- 11.13. On occasion and where necessary, subsidiary companies of the University
- 11.14. Companies or organisations providing specific services to, or on behalf of, the University under contract (a data processor) e.g. Microsoft for email services and of CRM services, Oracle for student records and other CRM services, Terra Dotta for the MyPlacement system, and Digitary for e-Docs
- 11.15. To banks (and other payment agencies you may use), family members who are paying your fees, sponsors or other third parties to enable them to pay student debts and this includes the disclosure of relevant information to our supplier of banking services for the purposes of complying with anti-money laundering regulations
- 11.16. To external agents and debt collectors acting for the University in relation to the repayment of student debts; where relevant to international sponsors and in the case of students in receipt of a student loan from a United States loan provider details about your studies will be disclosed to that provider

- 11.17. Greater Manchester Police, for relevant overseas students from certain countries where there is a requirement to register under the terms of a Tier 4 visa. In these cases only your name, date of birth and nationality and if applicable the details of any dependants are shared prior to your registration appointment with the Police. Further information is available [here](#)
- 11.18. Confirmation of your results and qualifications awarded may be made available via the 'e-Docs' system and you can choose to share this information with third parties such as existing and potential employers
- 11.19. We will provide references to third parties with your consent
- 11.20. On occasion, the above types of sharing may involve the transfer of your personal information outside the UK (e.g. to facilitate your participation in an exchange visit or to report to an overseas funding provider). Such transfers usually are necessary in order to meet our contractual obligations with you, and are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information
- 11.21. Other than as set out above, we will not normally publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation)
- 11.22. The Safezone App if you choose to download the app and create an account to utilise the support services offered as part of these services.
- 11.23. Our funders and sponsors - this may include for the purposes of applying for grants/funding and managing successful applications (the University is required, for example, to disclose certain information to funders and sponsors under grant/funding terms and conditions including, for example, allegations of bullying and harassment raised in connection with individuals associated with the grant/funding)
- 11.24. The Greater Manchester Mental Health Hub where we are liaising with them over a referral from/to them.

## **12. How is my personal information used after I complete my course?**

After you complete your course a permanent record of you and your studies may be retained so that the details of your academic achievements can be confirmed and used for statistical or historical research.

- 12.1. If you are contacted and asked to take part in student experience related surveys further privacy and data protection information will be provided to you. You might also be contacted as part of an audit to check that the survey has been undertaken properly
- 12.2. Unless you have requested otherwise, your data is accessible to the University and its Schools, Faculties, Institutes, Centres, divisions, directorates and recognised alumni



associations connected to the University. It is used and processed for a full range of communications and programmes involving academic and administrative departments. These include the following communications and marketing activities (by mail, email and telephone):

- Sending University publications;
- Promoting our services;
- Notifying you of upcoming events;
- Promoting discounts and opportunities.

### **13. What are my rights in connection with my personal information?**

Under certain circumstances, by law you have the right to:

- 13.1. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- 13.2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- 13.3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing
- 13.4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- 13.5. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- 13.6. Request the transfer of your personal information to another party

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you would like to exercise any of these rights, you should contact the University Data Protection Officer using the contact details in section 14. More information about your right is available from the University's data protection website: <https://www.manchester.ac.uk/discover/privacy-information/data-protection/>.

#### **14. How long is my information kept?**

We store your personal information as part of your student record for the duration of your studies and for a defined period after you graduate or withdraw from your studies. In addition, information directly relating to your studies and the qualifications you were awarded is retained much longer as stated above and this information may also be consulted as part of our assessment of any future application you make for further studies at the University of Manchester. In addition for medical students in order to fulfil GMC requirement for queries relating to fitness to practise or for the provision of change of career transcripts records relating to your studies will be retained for longer. Information about how long different types of information is retained by the University is published in the Records Retention Schedule: <https://www.manchester.ac.uk/discover/privacy-information/freedom-information/record-retention/>.

#### **15. Who can I contact?**

If you have any questions about how your personal information is used, or wish to exercise any of your rights, please contact the University's Data Protection Officer by email: [dataprotection@manchester.ac.uk](mailto:dataprotection@manchester.ac.uk). Alternatively you can write to The Information Governance Office, University of Manchester, Christie Building, Oxford Road, Manchester, M13 9PL.

#### **16. How do I complain?**

If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

#### **17. Are changes made to this Notice?**

This privacy notice was last updated in February 2022 and will normally be reviewed annually. It may also be amended from time to time.