

Heriot-Watt University

Information for students and applicants:

What we do with your personal data

In accordance with the Data Protection Act 1998, Heriot-Watt University is registered as the Data Controller for personal data we hold about you. The University collects and processes information in all formats about its current and former students, applicants and potential applicants. We also contract with data processors to manage personal data and communications on our behalf. Heriot-Watt University will process your personal data in accordance with the University Data Protection Policy, the UK Data Protection Act 1998 and other applicable laws. The University holds this personal data securely and restricts access to personal data to staff that need to use it in the course of their duties. Some of this information is defined as sensitive personal data under the Data Protection Act 1998.

Why do we process your personal data?

The University could not exercise its responsibilities and fulfil its education, training and support obligations to its students and applicants, without holding and using this personal data. We process student and applicant personal data to

- encourage potential students to apply to study here
- recruit and enrol students
- administer our programmes of study and associated funding and fee arrangements
- monitor performance and attendance, supervise, conduct assessments and examinations, confer and provide confirmation of awards,
- provide advice, support, accommodation and access to IT, library, archive, social, sport, catering, pastoral and other services to the university community
- deal with appeals and complaints promptly and fairly
- meet our obligations under health and safety, equality, immigration and other laws
- maintain lifelong links with our alumni
- seek and act on your feedback, provide management and statistical information to monitor and improve our performance and enhance the student experience
- support research where this does not compromise your privacy
- keep a permanent record of your time at Heriot-Watt for archival purposes.

The University needs to communicate and share personal data worldwide in the course of its business and transfers personal data as necessary to countries outside the European Economic area, when adequate levels of protection are in place.

When do we share your data with other people and organisations?

We share student data with a partner institution where this is necessary to deliver a programme collaboratively or jointly between the University and the partner institution. We may appoint external organisations to undertake work for us and contract with them to act as data processors on our behalf; examples may include training, payment and debt collection services and plagiarism detection systems.

Unless you ask us not to do this, we may disclose limited personal data in order to:

- enable you to communicate with staff, your student representative and fellow students on your programme of study;
- provide verification of your attendance and qualifications, e.g. in a reference, for a potential employer or employment agency;
- confirm your attendance, progress and assessment marks to your sponsor or the institution through which you are studying (if this is not Heriot-Watt University). Please note that certain sponsors or partner institutions of Heriot-Watt University may require us to disclose this information to them as a condition of sponsorship or enrolment.
- arrange a suitable industrial placement if this is part of your course;
- administer your right to be a member of the Heriot-Watt University Student Union;

- invite you to participate in the National Student Survey, the International Student Barometer or other official surveys that give us your feedback on our academic quality and your student experience.
- If you leave the University before completing your studies, we may ask [Back on Course Scotland](#) to provide you with advice and guidance (only applicable for students in the UK).
- Work in partnership with the Lothians Equal Access Programme for Schools ([LEAPS](#)), which provides advice and support to help eligible students to enter Higher Education, to track students throughout their studies at the University

Our legal obligations to disclose personal data

We also process applicant and student data to meet our statutory and other binding obligations. These include submission of statistical returns to government or its agencies, including the [Scottish Funding Council](#), and other official bodies, such as the [Higher Education Statistics Agency](#) (HESA). You can find a copy of the [HESA Data collection notice](#) here. We may

- provide information to local councils for exemption of Council Tax (only for students in the UK).
- inform the [Joint Information Systems Committee](#) to allow you to participate in the use of JISC software;
- confirm fee payments you may make using our online payment service provider;
- confirm your eligibility for tuition fee funding with agencies including the [Student Awards Agency for Scotland](#), the [Student Loans Company](#) or your sponsor

The University is also required by law to disclose the contact details of students who may be eligible to vote to the [Electoral Registration Office](#), in order to contact them to encourage them to register to vote.

Under the UK Equality Act 2010, we need to collect sensitive personal data about our applicants and students to assist with monitoring equality of opportunity and eliminating unlawful discrimination. It is optional to provide this information. The information gathered will inform our equality and diversity activities and be used for monitoring and reporting purposes only. This information will be held in the strictest of confidence in accordance with your rights under Data Protection legislation. If a student or applicant declares that they have a disability, the University has a duty to disclose this information on a need-to-know basis to staff to ensure that reasonable adjustments are made, enabling disabled students to meet their full academic potential.

Heriot-Watt University is a licensed sponsor under Tier 4 of the points based UK Government Immigration system. In order to process applications to study or remain in the UK we are required to share information with and request information from [UK Visas and Immigration](#) about the visa history of applicants and students who are subject to immigration law. Our sponsorship duties also include informing UK Visas and Immigration if a student fails to enrol, discontinues their studies, stops contact or has any other significant change in their circumstances. We have similar obligations to disclose data about students and applicants to our Dubai and Malaysia campuses to the relevant government authorities.

We disclose your personal data to other third parties only

- with your consent
- if requested by an organisation with a statutory function, such as the police, in a case where non-disclosure would prejudice law enforcement
- to meet a statutory or regulatory obligation, e.g. a court order
- in a medical emergency
- otherwise in accordance with the University's Notification with the Information Commissioner, and in compliance with the Data Protection Act.

Publishing information about graduating students and filming graduation ceremonies

Unless you ask us not to do this, we publish names and awards of graduands (including those graduating *in absentia*) in the graduation programme and in press releases to the media. We film and publish audio

and visual images of graduation ceremonies and broadcast ceremonies live worldwide on the University website.

Other photography and filming for promotional purposes

Unless you ask us not to do this, the University may take photographs, and other images, of students for possible use in University publicity and promotional material in print and on our website and in some cases for preservation in the University Archive.

You have the right to

- Find out what personal data we hold about you, why we hold it and what we do with it, how long we keep it and to whom we may disclose it
- Ask us to correct inaccurate data
- Ask us not to process information about you that causes substantial unwarranted damage or distress.
- Ask us for a copy of the personal data we hold about you. You can do this by completing this form <http://www.hw.ac.uk/registry/resources/subjectaccessrequestform.doc> and returning it to your School Student Records Officer, the Student Service Centre or the Academic Registry with proof of your identity and the statutory fee of £10. The University has 40 calendar days to comply with your request after receiving your payment, proof of identity and any further information needed to find the information requested.

Further information and advice

Contact the Freedom of Information and Data Protection team in Heritage and Information Governance on 0131 451 3219/3274 or by email: foi@hw.ac.uk.

Read our policies for protecting your data:

<http://www.hw.ac.uk/about/policies/data-protection.htm>

<http://www1.hw.ac.uk/registry/resources/studentrecordsmanagement.pdf>

<http://www.hw.ac.uk/staff/policies-governance/procedures/information-records.htm>

Find out more about our student policies and procedures on the Academic Registry web pages. <http://www1.hw.ac.uk/committees/lrb/lrb-policies.htm>

Terms and conditions of the University's online payments service, provided in partnership with our third party suppliers: <https://my.hw.ac.uk/payments/faces/Start.jsp>

Our Equality and Diversity webpages:

<https://www.hw.ac.uk/services/equality-diversity.htm>

Student data collection: this explains what student data we share with the Higher Education Statistics Agency

<http://www.hw.ac.uk/registry/resources/HESAnotice.pdf>

International Student Advisors' Office:

Guidance for international students who are subject to immigration control

<https://www.hw.ac.uk/students/international.htm>

You can access the Heriot-University entry in the Information Commissioner's Register of Data Controllers at <https://ico.org.uk/ESDWebPages/DoSearch>

Heriot-Watt University's Registration Number in the Information Commissioner's Register of Data Controllers is Z5905893. This register entry describes, in general terms, what personal data we process and why, how we obtain personal data and to whom we may disclose it.