

## **RVC Student Privacy Notice**

A privacy notice is a statement that discloses some or all of the ways we as a 'Data Controller': gather, use, disclose, and manage your personal data.

### **What is a 'Data Controller'?**

The Data Controller is the body – in this case the RVC – that determines the purposes for which and the manner in which any personal data are, or are to be, processed.

### **What is 'personal data'?**

Under UK Data Protection Law (The Data Protection Act 2018 – DPA) "Personal data" means any information relating to an identified or identifiable living individual. "Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to (a) an identifier such as a name, an identification number, location data or an online identifier, or (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

### **What is a 'data subject'?**

A 'data subject' is a natural living person whose personal **data** is processed by a **controller** or processor. So, when we hold and process personal data about our student body, they are our 'data subjects'.

### **What is 'Special Category Data'?**

The law provides a separate definition for "Special Category Data". This relates to information concerning a data subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences. You can expect the RVC to put in place additional safeguards when processing any Special Category Data that we obtain from you and to ensure that we have a robust legal bases for doing so.

### **This Privacy Notice and the RVC's data protection obligations under UK Data Protection Law.**

One of our responsibilities is to tell you in more details about the different ways in which we use your personal data. This Privacy Notice is designed to provide further information about these uses now that you are studying with us as a student of the RVC. In addition to the information in this notice, you may be given further information about the uses of your personal data when you use specific services and facilities offered by the RVC.

The RVC will use your personal data to carry out the necessary tasks for your enrolment and your wellbeing and your studies as well as for other purposes connected to your student life at the RVC and the legal requirements of government bodies, funders, and professional statutory regulatory bodies such as the RCVS. In doing so the RVC is defined as a **Data Controller** by UK Data Protection Law, and this means that we are legally responsible for the personal data we collect and hold about you.

Some of the personal data used for the above purposes is classed as 'special category data' under the DPA, such as information relating to your ethnicity or your medical history. This is collected to monitor our equalities responsibilities and disability information will be shared with relevant RVC staff in order to provide you with the best possible support for your studies.

We may also share special category data with your explicit consent when you engage with optional services or with collaborative partners (such as external PGR supervisors). Access to, and the sharing of, this information is controlled very carefully. You will be given more details about our use of any sensitive personal data when we collect it from you, however if you are asked to provide sensitive personal data by the RVC and the reason for doing is not clear to you please request further information from the requestor or from [data@rvc.ac.uk](mailto:data@rvc.ac.uk).

In addition to the information in this notice, you may be given further information about the uses of your personal data when you use specific services and facilities offered by the RVC.

### **Types of personal data collected**

The RVC may collect and process the following information about you upon your enrolment with the RVC and subsequently in order to manage your relationship with us as a registered student. Please note that some of the information listed below will only be collected in specific situations and will not therefore be collected in respect of all students.

### **Information to help Identify you:**

- Fee Status (e.g. home, EU or overseas)
- Name
- Date of birth (age)
- Proof of Identity (e.g. passport)
- Contact Info (Address, Phone, Email etc)
- Place of Birth
- Country of Domicile
- University student reference number
- Next of kin / guardian / family etc data

### **Special Category Data:**

- Disability / information relating to your health (note that this is only collected in specific situations, e.g. where it is required for RVC to comply with applicable law)
- Sex
- Ethnicity
- Sexual Orientation
- Gender Identity
- Religious Belief
- Nationality

### **Information relating to your education and employment history:**

- UKVI Confirmation for Acceptance to Study/Visa/Biometric Residence Permits and other immigration information (note that this is only collected in certain circumstances in relation to overseas applicants)
- Date of Entry to the UK (note that this is only collected in certain circumstances in relation to overseas applicants)
- Overseas police check (note that this is only collected in certain circumstances in relation to overseas applicants)
- English proficiency
- Literacy/Numeracy proficiency
- Student status (e.g. 'offer', 'accepted' etc)
- Qualification Information (provided by the applicant and external bodies e.g. UCAS)
- Information about your career aspirations and work experience
- Marks, Awards, Course, Programme and other information regarding your academic progress and programme engagement
- Fees/ Payment Info
- Student Funding and Finance information (including sponsor details)
- Occupational Health (note that this is only collected in relation to students on specific programmes of study)
- Reference / Referee data
- Statutory checks
- Five-year address history
- Photographs/Video recordings (e.g. at student events)

- Geodemographic - Low participation neighbourhood (note that this information is only collected in relation to specific cohorts of students), Parental Higher Education, Time in Care (where applicable)
- Information relating to any complaints that you make.
- Information relating to any disciplinary action in which you are involved.
- Data relating to your criminal convictions and offences, where appropriate
- GPS location data and digital signature for UKVI attendance monitoring purposes (overseas students only)
- Other information relating specifically to your status as a student at RVC.

## Cookie Notice

### What are cookies?

Cookies are small text files that are stored on your device when you visit a website. They are widely used to make websites work more efficiently and to provide information to the website owners.

### What cookies do we use?

We use the following cookies:

- Essential Cookies: These are necessary for the website to function properly.
- Functionality Cookies: These enhance the functionality of the website by remembering your preferences.

### How do we use cookies?

The cookies are used for attendance monitoring purposes (overseas students only) via the Attendance Monitoring Service website <https://ams.rvc.ac.uk> to capture the email address of the student logged in to make the attendance submission data.

### Managing cookies

You can control and/or delete cookies as you wish. For details, visit [aboutcookies.org](https://aboutcookies.org). You can delete all cookies stored on your computer, and most browsers can be set to block cookies. However, if you do this, you may have to manually adjust some preferences every time you visit the site, and some services and functionalities may not work.

## Our legal bases for processing your personal data

The legal basis for processing your personal data in the majority of instances is that of *performance of a task in the public interest* as a provider of higher education with a focus on professional formation and continued career development. Additionally, much of the processing we carry out also enables the performance of the contract between the RVC and yourself for study or is required for *Compliance with a legal obligation* e.g. health and safety legislation and UK equal opportunities monitoring.

Where we are processing your data for purposes for which we have sought your consent then the legal bases for processing that data is the *consent* that you have provided.

If we are obligated to share your personal data with the police or the courts, then having confirmed that there is a legitimate bases for sharing we will do so on the bases of *legal obligation*.

Where we share information with third parties for the purposes of marketing and administering Alumni Relations then the legal bases will be *legitimate interests*. These third parties will be considered Data Processors, and we will ensure that they are compliant with their obligations under UK Data Protection Law. Where our *legitimate interests* form the legal basis to process your personal data we are required to ensure that our interests are balanced against any detriment you may face from our processing.

Where we are processing *special category data* (see also above) we do this for the following purposes: Equality of opportunity or treatment; Management of health care systems / services; Establishment, exercise, or defence of legal claims; Employment and social security and social protection law; Vital interests; Counselling; Safeguarding of children and of individuals at risk.

Where we are processing *criminal convictions data*, we do this for the following purposes: Regulatory requirements relating to unlawful acts and dishonesty; Safeguarding of children and of individuals at risk; Protecting the public against dishonesty; Management of health care systems / services.

### **How is my personal data used while I'm a student at the RVC?**

Your personal information is used as permitted or required by law and for a range of academic and administrative purposes in relation to your study, your experience as a student and your general wellbeing. Its uses include the following:

**Communications:** To enable effective communications with you – please note that your RVC email address will normally always be used for institutional communications with you. Your personal email will only be used in exceptional circumstances.

**RoVER:** is the web interface which allows students and staff to access data held in the RVC's student record system. The RoVer portal allows you to enrol, change contact details at any time, look up your candidate number, view information regarding your fees and loans, and print letters confirming your status for banks, council tax authorities and other bodies. Your basic contact details will be made available through the RVC student directory via RoVER.

**Education:** To facilitate your education, record the details of your academic studies and progress and assessments including any placements with external organisations, and quality assurance processes including the award of your degree.

**Videocasting Software:** we may also potentially capture your image and/or voice recordings as part of your learning as a result of our use of Panopto/MS Teams/Zoom in specified teaching locations across the RVC campuses, as well as online teaching.

**Turnitin®:** the RVC uses the Turnitin® UK system as a plagiarism detection source. The Turnitin® system compares your work against a variety of sources. You will be required to provide basic personal data (e.g. name, e- mail address, course details) to use the Turnitin® service. Turnitin's Privacy Statement provides further information regarding the collection and processing of your personal data.

### **Health, Safety & Wellbeing**

- To support your health, safety, and wellbeing requirements.
- To keep a record of your main and temporary accommodation (at the RVC/ with landlords or placement accommodation).
- To operate security processes (ID cards and access logging/ CCTV, parking permits)
- **SafetyNet:** All health and safety incidents are logged through SafetyNet and in maintained by the Health and Safety Team.

### **Student Appeals, Complaints and Conduct (SACC) matters -**

- Student data relating to SACC matters are administered centrally by the SACC Team within the Academic Registry.
- To record disciplinary, complaint, and or conduct/ fitness to practice processes and procedures.
- Records of SACC cases are retained for 3 years following student graduation or exit from the RVC to enable the RVC to respond to any requests regarding the decision and processes that may be made by the OIA and/or Subject Access Requests (SAR).

**Occupational Health:** individual information may be shared with our Occupational Health Providers in order to assess fitness to practice, carry out health surveillance when required by law, and to enable them to support any individual occupation health assessments or services.

**Police / Family:** please note that this may include sharing necessary information with appropriate third parties such as your family or the police in circumstances where it is in your vital interests or legally required.

**The RVC Students' Union:** To enable the RVCSU to manage your membership by communicating with you the RVC will share some information with them. RVCSU will use this information for running the Union, for example communications regarding your membership rights, including for example, notice of general meetings, referenda, and election of trustees, as well as information about the Union's activities, clubs, societies and events. Some information will be provided by us to Membership solutions Ltd. to enable secure access to the membership sections of the RVCSU webpages.

**Other subscriptions and memberships:** To enable RVC funded membership subscriptions to the British Veterinary Association or Student American Veterinary Association or similar professional bodies of benefit to the students.

**Finance:** To administer the financial aspects of your relationship with us (e.g. fees, debts, funding) and any funders or sponsors.

**Funders/ Local Authorities:** Relevant personal data including periods of attendance will be shared with formal funding bodies including the Student Loans Company (SLC) and Student Finance as this will affect your right to receive funding. The RVC will confirm periods of attendance, assessment results and similar personal data to external bodies such as Local Authorities, tax collecting bodies where it is necessary and reasonable to do so. The RVC provides information to Local Authorities for the purpose of administering your council tax exemption including a list of currently enrolled students living within specific postcode boundaries.

**Debt:** Your personal data may be shared with third parties attempting to recover debt on behalf of the University where internal debt recovery procedures have been unsuccessful. The RVC may also include details of an outstanding debt in any reference or verification of results supplied to a third party.

**Insurance:** The University may share your personal data with its insurers for the purpose of providing insurance cover or in the event of a claim.

**Events:** To manage your use or booking of facilities and participation at events (e.g. social learning spaces, sports centre/ gym classes, functions, graduation)

### **Promotional, operational, and educational materials / filming and photography**

**Images (film or photography):** may be captured incidentally by us or by third parties working with our consent/on our behalf at events or on campus for a variety of applications including print, broadcast, and digital. Your image may be captured in crowds/background. We will endeavour to clearly signpost when filming or photography is taking place but please be aware that these images may be used. From time to time, we may also take individual photographs of students and in this case, we would seek your permission to use such images.

**Monitoring and reporting:** To produce statistics and research for internal and statutory reporting purposes to the Higher Education Statistics Agency (HESA), the Office for Students and other government bodies.

**Higher Education Statistics Agency:** The RVC will share some of your personal data with HESA, the Office for Students and other government bodies and/or third-party organisations working on their behalf. A full description of the personal data which is shared with HESA and what they use it for can be found in here: [Collection notices | HESA](#) on the HESA website. The RVC and HESA may compare

your data to educational records from previous years to check the levels of your current qualifications in order to determine the fees you are required to pay.

**National Student Survey:** The RVC is required to pass personal data about its final year undergraduates to the Office for Students or their agents, in order for them to carry out the National Student Survey. This survey gives final year students the chance to give feedback on their experiences at the RVC. It is described in detail on the [National Student Survey website](#). The RVC will pass your name and contact details to the agent carrying out the survey. The agent may then contact you to take part. You do not have to take part in the survey, and you can opt out at any time by contacting the agent and providing them with verification of your identity by confirming your date of birth.

**Professional Statutory Regulatory Bodies:** The RVC provides statistical or sampled assessment information to professional statutory regulatory bodies (RCVS, AVMA, AVBC, EAEVE) to maintain accreditation or inform their own quality assurance processes. The RVC may also share your personal data with the RCVS to enable student enrolment with the RCVS and is obliged to share your personal data with professional bodies to confirm your qualifications and accreditation of your course. Your personal data may be shared with professional bodies where concerns about your fitness to practice have been raised, including where external examiners raise concerns during the external marking process. In respect of fitness to practice, your personal data will only be shared when deemed necessary by an appropriately qualified professional employed by the RVC.

**Partner Institutions/organisations and providers:** We will share relevant information, including personal data, with partner institutions/organisations delivering parts of your programme of study so long as it is relevant and appropriate to your application, enrolment, study, and wellbeing. Special category personal data (including data relating to health) will only be shared with a partner institution or organisation where explicit permission to do so has been provided by a student.

**UK Visas and Immigration:** We may also provide information as required by law to the UKVI on individuals or the student population in order to maintain compliance with our visa sponsor duties.

**Equality Monitoring:** To produce statistics and research for internal and statutory reporting purposes to help us and statutory bodies meet the public sector equality duty under the Equalities Act 2010.

**Graduate & Postgraduate Outcomes:** To produce statistics and research for internal and statutory reporting purposes to help us and statutory bodies understand the impact of your studies has on your career.

**Graduate Outcomes Survey:** Everyone who graduates will be surveyed by a centralised provider on behalf of the HESA at 15 months post-graduation, we be required to pass graduate contact details to HESA who have provided specific privacy guidance for the new collection here: <https://www.hesa.ac.uk/innovation/outcomes/providers/data-protection>.

**Postgraduate Taught & Postgraduate Research Experience Surveys:** We also provide contact information and personal characteristics to [Advance HE](#) who may then contact you to understand your experience as a postgraduate at the RVC. Advance HE and JISC are data processors for the RVC. Advance HE may also use sub-processors as and when required. Data will also be collected by JISC Online Surveys <https://www.onlinesurveys.ac.uk/about/> and shared with Advance HE.

**Award Verification:** RVC awards are a matter of public record. The RVC may therefore disclose to third parties whether or not you have received an award and if so, the date and classification, without notifying you. Such a disclosure would be subject to a check regarding the origin of the request.

**References:** Academic staff may agree to provide a reference for you if you apply for a job or further study. You should ask permission from the staff member and the requesting organisation should provide a copy of your signed consent.

**Alumni relations:** to keep you in touch with RVC and the Alumni Community, Further details about how the Directorate of External Relations may use your information can be viewed in the separate Alumni Privacy Notice

### **How long will we keep your personal data?**

We will retain your data in accordance with the JISC record retention guidance for Higher Education or any specific legal requirements. <https://www.jisc.ac.uk/guides/records-retention-management>.

Where we are processing your data under the legal basis of consent (e.g. marketing, research) then we will keep it for as long as we continue to have your consent. We will update our records by seeking consent on a regular basis or through you telling us you no longer wish us to process your data (you may use unsubscribe options or email [development@rvc.ac.uk](mailto:development@rvc.ac.uk)).

### **How can I access my personal information and exercise my other rights in relation to personal data that the RVC holds about me.**

Under UK Data Protection Law, you have the right, subject to certain exemptions, to ask for a copy of the information we hold about you and to have any inaccuracies in your information corrected. If you want to access your information, send a description of the information you want to see and proof of your identity to [data@rvc.ac.uk](mailto:data@rvc.ac.uk).

If you are an RVC Alumnus/Alumna and have created an account for our Alumni Online Community (RVC4Life), you can sign into your account to access and update most of your information.

You also have a range of further rights as follows: Right to be informed; Right of Rectification; Right or Erasure, Right to be Forgotten; Right to Restrict Processing; Right to Data Portability; Right to Object; Rights in relation to Automated Decision Making and Profiling. Details of your rights are set out in more detail in the RVC's Data Protection policy which can be found on our [website](#).

### **Who regulates the use of my personal information?**

The RVC maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with Data Protection Law. The RVC's registration number is Z6779018. Please see the [Information Commissioners Office](#) website for details.

### **Who do I contact with questions?**

If you have any questions or concerns about how your personal data is used, or you wish to exercise one of the rights outlines above please contact the RVC's Data Protection Officer: [data@rvc.ac.uk](mailto:data@rvc.ac.uk)

Further information, including our Data Protection Policy, can also be found on our website.

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