



UNIVERSITY COLLEGE  
OF ESTATE MANAGEMENT

# **UCEM Privacy Policy**

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## Approval History

Version	Date	Name
1	06/12/2017	Board of Trustees
2	12/09/2018	Board of Trustees
3	13/12/2018	Board of Trustees
4	26/03/2020	Board of Trustees

## Document History

Version	Date	Reason	Person
00.01	28/11/2017	First draft – incorporating comments from consultation with GDPR Working Group	Liz Howlett
00.02	12/09/2018	GDPR and DPA 2018 updating	Liz Howlett
00.03	13/12/2018	Annual review	Liz Howlett
00.04	06/02/2020	Annual review	Lucy Roper

## Privacy Notice for Students

**This privacy notice sets out the type of information we collect and hold and how it is used. It applies to all students (past, present, and prospective) and those who study with us via UCEM Courses Ltd (Online Academy) and UCEM Asia Ltd. There are contact details for queries about your personal information. All personal data collected will be treated in accordance with the General Data Protection Regulation (2016/679) and the Data Protection Act 2018.**

### What information do we collect?

When you contact us, we create a record in your name. To that record we add information that you give us on your application form, at registration and throughout your studies. This may include passport details or other documents verifying your identity. We hold general information about students, such as their name, address, programme of study and fee payments, and data to do with examinations, assessments and course results. We keep records when you contact us, and we keep records of your participation in learning activities. We may monitor and record telephone calls between you and UCEM to make sure that we have carried out your instructions correctly and to help us improve our services through staff training. Cookies are small files on your computer which record interactions between you and the UCEM website and, in some cases, other websites. You are free to disable cookies but will lose some functionality if you do so.

We do not sell personal information to other organisations.

**The data controller for your personal data is UCEM, Charity Registration No: 313223, Horizons, 60 Queen's Road, Reading, Berkshire, RG1 4BS**

### How do we use your information?

We set out below those circumstances where it is necessary for us to process your personal information. (These circumstances are not mutually exclusive).

Information processed includes, but is not limited to, the data listed within our [Data Protection Policy](#) that should be read in conjunction with this policy.

We use your personal information in the following ways:

- To process enquiries, applications and registrations including verification of identity
- To provide services to enquirers and students including sending you information about current and future study opportunities with UCEM.
- To provide certain online facilities and/or services as referred to in the conditions of registration. This includes tutors accessing contact details for students.
- To keep sponsoring organisations informed about your progress.
- We sometimes use external service providers to process your personal information when providing relevant services to UCEM under strict contractual confidentiality obligations.
- To allow other organisations to provide services to students and alumni on behalf of UCEM
- To carry out research to help us plan and improve our services. We may contact you ourselves or ask outside research agencies to do so on our behalf.
- To produce aggregated statistical information, including data for monitoring equality

of opportunity.

- To provide information about students to other organisations, such as the Higher Education Statistics Agency ('HESA'), in line with legal obligations and government requirements as well as authorities carrying out audit and quality assurance checks, for example, Ofsted, Office for Students ('OfS'), and internal audits.
- To support funding claims from the Education and Skills Funding Agency ('ESFA')
- To consider applications for mitigating circumstances which may involve the provision of medical certificates, death certificates and other sensitive personal data.
- To support you in your studies. We may use information you have given us such as your ethnic background, disability and/or educational qualifications in addition to information we collect about your participation in learning activities to identify students who require additional support or specific services. With regard to these final two bullet points please note that your acceptance of the terms and conditions of registration is your explicit consent that this information can be shared with other departments at UCEM who we consider need to know this information. If additional support is agreed we will enter into an Additional Support Agreement with you which will make clear that by signing it you are consenting to the information being shared both with other departments within UCEM and also with appointed support providers where it is necessary and appropriate in order to provide such support.

## Who might we share the information with?

Where information is shared with third parties, UCEM will seek to share the minimum amount necessary. For example, we may share only your unique identifier/student number and not your name.

### Third party service providers

All third-party service providers that process data on our behalf are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions.

**Surveys** - Your contact details may be passed to survey contractors to carry out the National Student Survey (NSS) and surveys of student finances. These contractors will use your details only for that purpose and will then delete them.

**Apprenticeships** - If you are on the apprenticeship programme we will share information with partner organisations involved in the delivery of the apprenticeship (the relevant partner organisation will be identified in the apprenticeship agreement). If you are under eighteen, we will share data with your parent or carer as detailed in the Apprenticeship Evidence Pack.

Your contact details may be passed to an external service provider involved in the delivery of your course

**Higher Education Statistics Agency** - We are required to send some of the information we hold about registered and previous students to the Higher Education Statistics Agency ("HESA"). This information forms your HESA record.

About 15 months after you graduate, HESA may contact you on behalf of UCEM to ask

you to fill in the Graduate Outcomes Survey Questionnaire. UCEM is actively collaborating with HESA in the delivery of the Graduate Outcomes survey and will supply the contact details they hold for you to HESA for the sole purpose of conducting the Graduate Outcomes survey.

HESA may also use a third-party provider to implement the survey and will share your information with that provider

For full information about the [Graduate Outcomes Survey](http://www.graduateoutcomes.ac.uk) and how HESA uses your data, go to: [www.graduateoutcomes.ac.uk](http://www.graduateoutcomes.ac.uk) [accessed 6 February 2020]

UCEM cannot remove you from the survey. If you do not wish to participate in the survey, you need to email this instruction to [info@graduateoutcomes.ac.uk](mailto:info@graduateoutcomes.ac.uk)

For full information about how HESA uses the information please see the HESA website and section on [HESA regulation and data protection](http://www.hesa.ac.uk/about/regulation/data-protection) at: [www.hesa.ac.uk/about/regulation/data-protection](http://www.hesa.ac.uk/about/regulation/data-protection) or read the HESA Student Collection Notice at Appendix Six of our [Data Protection Policy](#).

**UCEM Products and services** - We also like students and alumni to be told about products or services offered by our associates which may involve our associates receiving some personal information about you. If you do want to receive information about products or services, either from UCEM or our associates, we will ask you to make this choice at admissions stage or by contacting us at any time on 0800 019 9697 (Admission Enquiries) or [admissions@ucem.ac.uk](mailto:admissions@ucem.ac.uk)

**Safeguarding** - We may share data with relevant UCEM staff and external parties for the purposes of safeguarding students including compliance with the Prevent duty under the Counter- terrorism and Security Act 2015. UCEM complies with the Social Care Institute for Excellence guidelines on sharing information. Information will be shared with the right people at the right time to:

- Prevent death or serious harm
- Coordinate effective and efficient responses
- Enable early interventions to prevent the escalation of risk
- Prevent abuse and harm that may increase the need for care and support
- Maintain and improve good practice in safeguarding students
- Reveal patterns of abuse that were previously undetected and that could identify others at risk of abuse
- Identify low-level concerns that may reveal people at risk of abuse
- Help people to access the right kind of support to reduce risk and promote wellbeing
- Help identify people who may pose a risk to others and, where possible, work to reduce offending behaviour
- Reduce organisational risk and protect reputation

**Sponsored/Funded Students** - If your fee or part of your fee is being paid to UCEM by a sponsor, or you are partaking in an apprenticeship programme of studies, information may be released to key identified personnel within the sponsor organisation (i.e. Line Manager, HR Department, Learning & Development Mentor), including your name, date of birth, programme of study and module details, progress and assessment results.

Where students are on courses funded by our higher education partners, your personal details and progress will be shared with the appropriate higher education partner and other regulatory bodies

**Professional Bodies** - If you are on a programme of study that leads to professional recognition, we will share some information with the relevant professional body (e.g. RICS; CMI)

We work with carefully selected international representatives and may share the personal information of students in those geographical areas so they can provide local assistance. We will only do this with your explicit consent.

**Financial support services** - If you are in debt to us, we may give other people information for the purposes of recovering the debt

We access data through the Student Loans Company ('SLC') and confirm attendance by students to the SLC

We may contact HESA or other educational institutions (the Individual Learner Record is submitted to HESA and ESFA to draw down funding) to confirm the qualifications you have obtained or to check whether you have been included in a previous HESA or Individual Learner Record (ILR) return. We may also contact the National Agency for the Recognition and Comparison of International Qualifications and Skills (NARIC)

Your information may be used to detect and prevent fraud in respect of public funding, and we may release information to the police and other law enforcement agencies for crime prevention and detection purposes if required to do so.

Turnitin: plagiarism detection system - We submit the content of student assignments to Turnitin, a plagiarism detection system. This may involve data being held on a server outside the EEA. No personal details will be submitted to this system. Assessment results may be shared with external examiners and quality assurance agencies to ensure academic standards are maintained.

## **Alumni**

Students become alumni when they are entitled to have received their award certificate. We are keen to maintain contact with our alumni in a way convenient to you. We want to give alumni the opportunity to undertake continuing professional development at discounted prices, attend networking events and enjoy business development opportunities. We will contact you by email when you receive your award notification and make a connect request via social media. After your graduation ceremony, we will post to you an alumni pack with information about all the benefits which alumni enjoy. We need your explicit consent to continue to communicate with you and we hope that you will be happy to give this and stay in touch. It is very helpful to know the best way for you to receive information from us and we will ask you for your preferred method of communication at the same time.

## **Transfer of data outside the EEA**

If you are studying outside the European Economic Area, we may need to transfer your personal data to countries outside the EEA and make it available to institutions which have a partnership arrangement with us so that we can provide services to you. By way of example we may share award or progress information to the World Education Service, overseas employers, recruitment agents, reference agencies or notaries. Such countries may not have the same level of protection for personal information, and individual rights in relation to personal information, as in the EEA, but UCEM will only transfer your personal

information to such recipients where necessary safeguards have been secured by contract.

As part of our provision of online services (including the Virtual Learning Environment 'VLE') and activities, your name and other information (as stated in the conditions of registration), may be visible to UCEM staff, students, UCEM service providers (including third party software providers) and other authorised persons who may be outside the EEA. By registering on a UCEM course, you agree to your personal information being processed in this way.

## **How long do we keep data?**

UCEM will retain student data indefinitely (for historical purposes) or until a student requests us to do otherwise. We will publish on our website any changes we make to our data protection policy and notify you by other communication channels where appropriate.

Where you have supplied sensitive data as part of a mitigating circumstances application that data will be retained until the point beyond which it is no longer possible to appeal the decision. This will generally be two years after the student end date on our system.

Where you exercise your right to erasure, we will continue to maintain in respect of past students a core set of personal data (name, date of birth, contact details, record of learning and achievement, award details and unique UCEM identification number) to ensure we do not contact you inadvertently in future, while still maintaining our record of your academic achievements. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

## **How can I access the information you hold about me?**

You are entitled to know what personal information UCEM holds about you and how that information is processed. You are entitled to ask for your personal data to be corrected where you believe it is inaccurate. You are entitled to withdraw your consent to the processing of your personal data by UCEM.

However, if the processing is necessary to provide you with the service you have registered for then withdrawal may mean you are effectively withdrawing from the programme of study you have signed up to. We will make it clear if this is the case and discuss your concerns directly with you before we stop processing your data.

The 'right to be forgotten' is a qualified right and we have to apply the public interest test when considering a request for the deletion of personal data. We must make it clear that we will not generally consider it to be in the public interest for data to be deleted that records failure or misconduct.

Please make any requests or complaints to:

The Data Protection Officer (DPO)  
University College of Estate Management (UCEM)  
Horizons  
60 Queen's Road  
Reading  
Berkshire  
RG1 4BS

Email: [dataprotection@ucem.ac.uk](mailto:dataprotection@ucem.ac.uk)

If you are dissatisfied with the handling of your request or complaint, you have a right to appeal to the Information Commissioner. There is no charge for making an appeal. Contact details are:

The Information Commissioner's Office (ICO)  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 01625 545745 or 0303 123 1113 (local rate) or  
email: [casework@ico.gov.uk](mailto:casework@ico.gov.uk)

[ICO website](http://www.ico.org.uk) [online]. Available at: [www.ico.org.uk](http://www.ico.org.uk).

There are specific sections on the website about GDPR and the new Data Protection Bill

**Dated: 6<sup>th</sup> February 2020**

This Notice will be reviewed and updated at least annually

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