

Union School of Theology

Data Protection Policy

Approved by Union School of Theology (UST) Academic Board - 17-01-2018

Policy reviewed by Academic Board September 2018; December 2021. Due for review December 2024

This policy reflects the principles contained in the new GDPR legislation effective from 25 May 2018 onwards.

Revised version approved by Academic Board 29th November 2022

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1. INTRODUCTION and SCOPE

Union Foundation is the registered name of the organisation which will handle your data (the Data Controller). Union Foundation is variously known as, and trades as, Union, Union School of Theology, Union Research, Union Publishing and Union Mission. It is also known more locally as 'the School'. This policy applies to each part of the organisation, and for ease will be collectively referred to throughout as 'the School' or 'Union'.

This policy reflects the principles contained in the new GDPR legislation effective from 25 May 2018 onwards. It is written in accordance with that legislation and also is aligned with;

- [UST Student Handbook](#);
- [QAA 'UK Quality Code for Higher Education](#)
- [Open University Handbook for Validated Awards](#);

It includes references to and explanations of the Student Fair Processing Notice, and how it applies both to students and staff.

2. PRINCIPLES

The School is committed to preserving the privacy of its learners, employees and hirers and to complying with current Data Protection Regulations. To achieve this aim, we shall process and store information about our learners, employees and other clients and contacts as follows:

2.1 Personal data will be processed fairly, lawfully and with transparency in accordance with each individual's rights under the prevailing legislation

2.2 Student personal data will be obtained for educational purposes, employee data will be stored for employment purposes and hirer's data will be stored in order to facilitate the use of our premises

2.3 We will store all data, whether manual or electronic, securely

2.4 We will collect only relevant and proportionate data, i.e. it will be adequate and not excessive

2.5 Every effort will be made to ensure the data is accurate and, where necessary, kept up to date

2.6 Data will not be unlawfully disclosed to any other person unless we are legally obliged to do so

2.7 We will only transfer data within the School on a 'need-to-know' basis so that we can support all educational and employee services to the recipient

2.8 Students and staff will be provided with a Fair Processing Notice (see Appendix 1) which will set out what data is stored and the purpose for which it is being stored. The Notice will also contain details of what, if any, information will be passed to a third party and the purpose for which it will be used by them. Information that is already in the public domain is exempt from current Data Protection Regulations

2.9 Personal information on the Union Cloud (the VLE) will be reviewed and updated at the end of each academic year. This information is deleted at the end of the academic year when a student leaves the School or sooner in the case of courses that are shorter than a year

2.10 Data will be kept in accordance with the rules set out in section 6 of this policy – the Data Retention Schedule.

3. RESPONSIBILITIES, POLICY APPROVAL AND VISIBILITY

RESPONSIBILITIES and POLICY APPROVAL

- The Academic Board have overall responsibility for this policy including its approval, monitoring and annual review
- All staff have responsibility for ensuring that the policy is applied in all their dealings with data held for staff, students, applicants and enquirers.

POLICY VISIBILITY

- This document can be found on the School's website: www.ust.ac.uk
- Every effort will be made to respond to any request to provide this policy in a different format
- This policy will be included in staff and student induction and hirers of our premises will be made aware of the policy when placing a booking.

4. DATA PROTECTION FOR STUDENTS

4.1 PERSONAL ACCOUNTABILITY

It is your responsibility to tell UST if any of your details change - particularly your contact details - so that we can keep your records up to date.

You should not give out your student number or IT passwords to any other student, so there can be no chance of your number or password being abused.

4.2 CONSENT TO HOLD DATA

You are required to give your consent to Union to enable us to handle your personal data as detailed in this policy. This is provided by the 'Consent to use Personal Data Letter - Students' document - see Appendix 2. If UST finds it necessary to obtain other data from you, or to use existing data in a way which is not described in your consent letter, UST will obtain fresh consent.

At any time, you have the right to refuse or withdraw consent from Union using your personal data. Union will be bound by this except in circumstances where UST is required to use or continue to use your data by reason of law. Refusal or withdrawal of consent must be given in writing.

4.3 WHAT RIGHTS DO YOU HAVE?

The regulations entitle you to obtain confirmation that your data is being processed, and to request access to your personal data which is held by Union.

You have a right to complain to the Information Commissioners Office (ICO) <https://www.ico.org.uk/>, if you are concerned about the way your personal information has been processed.

5. DATA PROTECTION FOR STAFF

This section describes how Union will collect, store and process the personal data of a member of staff. By staff is meant any Union employees, workers and volunteers, whether past, current or prospective.

5.1 WHAT DATA WILL WE ASK FOR AND HOW WILL WE USE IT?

Union may collect data about you by asking for some or all of the types of information shown below. We will use the data only in connection with your employment with Union.

| Information Union may ask you for | How Union will use your information |
|---|--|
| Application for Employment Form | To obtain contact details for use in connection with your application. To consider your suitability for employment. |
| Curriculum Vitae | To check for relevant experience and qualifications in respect of the job. |
| Copies of relevant academic awards | To verify the authenticity of your qualifications. |
| Passport, Biometric Data, Birth Certificate | To check your identity and that you are legally entitled to live & work in the UK. |
| Medical Questionnaire | To determine if any reasonable adjustments in the workplace are needed as a result to any disability or medical condition. |
| New Start Details Form | To capture the information we need to add you to our payroll, tax and pension records. |
| P45 Tax form or P46 Tax declaration | To calculate your appropriate tax code. |

5.2 WHO WILL UNION SHARE YOUR INFORMATION WITH?

The data that Union collect from you will only be shared with other parties where we have a valid reason to do so or where we are required to do so by law, in connection with your employment, as follows:

| The information | Who Union share it with | Valid reason |
|---|---|--|
| Personal and contact details, national insurance number and earnings. | IRIS Payroll Business – a third party provider of payroll software. | To process payroll (salary, tax, national insurance and pension payments etc.) |

| | | |
|-----------------|--|---|
| Data as above | Her Majesty's Customs & Revenue (HMRC) - UK government department responsible for the collection of taxes. | To report earnings of employees to HMRC for the purpose of collecting taxes, as required by UK law. |
| Data as above | SLD Wealth Management - an independent financial adviser. | To enrol in the staff group pension scheme, whether through employee choice or by way of automatic enrolment in our workplace pension scheme, as required by law. |
| Data as above | Scottish Widows - a pension provider | To enrol in the staff group pension scheme, whether through employee choice or by way of automatic enrolment in our workplace |
| The information | Who Union share it with | Valid reason |
| | | pension scheme, as required by law. |

5.3 HOW LONG WILL UNION STORE YOUR DATA?

Union will only *keep* your data for as long as we need to. Once the data has served its purpose it will be discarded. For example, once Union have used your medical questionnaire to determine if any reasonable adjustments are need to your working environment due to disability or medical condition, we will dispose of the questionnaire.

Union will only *continue to keep* your data if there is a valid reason to do so. For example, Union will need to maintain records for ongoing payroll processing, but Union will no longer need your copy passport once we have established you have a legal right to live and work in the UK, and it will be discarded.

5.4 HOW DO WE KEEP YOUR DATA SECURE

When you give Union personal information, steps are taken to ensure that it is treated securely. All of your data will be safeguarded while being stored and processed by Union. All data which is no longer needed will be disposed of securely. Data includes information held in paper or electronic form, and in any format such as computer files, discs, USBs, laptops etc.

Non-sensitive details such as your email address are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, while Union strives to protect your personal information, Union cannot guarantee the security of any information you transmit to Union, and you do so at your own risk. Once Union receives your information, we make our best effort to ensure its security on our systems.

5.5 WHAT DO YOU NEED TO DO?

You need to give your consent to Union to enable us to handle your personal data in connection with Union employment matters, as detailed in this policy. You consent to this by using the 'Consent to use Personal Data – Staff Letter - see Appendix 3.

If Union find it necessary to obtain other data from you, or to use existing data in a way which is not described in your consent letter, Union will obtain your fresh consent.

At any time, you have the right to refuse or withdraw your consent from Union using your personal data. Union will be bound by this except in circumstances where we are required to use or continue to use your data by reason of law. Refusal or withdrawal of consent must be given in writing.

5.6 WHAT RIGHTS DO YOU HAVE?

The regulations entitle you to obtain confirmation that your data is being processed, and to request access to your personal data which is held by Union.

6. DATA RETENTION SCHEDULE

| Type of Record | Minimum Retention period | Responsible member, and Location | Reason for Length of Period |
|---|--|---|--|
| 1. Applications & Admissions | | | |
| 1.1 Records documenting the handling of enquiries from prospective students | Current Academic Year + 1 year | Admission Enquiries Officer <ul style="list-style-type: none"> • Maytas • Spreadsheets | Good practice |
| 1.2 Records documenting the handling of applications for admission: unsuccessful applications | Current Academic Year + 1 year | Programmes and Registry <ul style="list-style-type: none"> • Maytas | Good practice |
| 2. General student files collated during academic career | | | |
| 2. Core student records, including documents relating to dates of study; progression, programme of study, academic achievements (incl. transcript) and conduct; transfer, withdrawal or termination of studies) | Permanent (transfer to archive after 60 years) | Programmes and Registry <ul style="list-style-type: none"> • 1985-2001 Paper • 2001-2014 Access DB • 2014-Maytas | Permits school to provide references, transcripts, analysis of data. |
| 3. Programme administration | | | |
| 3.1 Class lists & schedules | Current Academic Year + 6 years | Programmes and Registry | Good practice. UKVI requirement for Tier 4 students |
| 3.2 Students attendance data. | Current Academic Year + 6 years | Programmes and Registry | Good practice. UKVI requirement for Tier 4 students |
| 4. Students' academic work | | | |

| | | | |
|---|---|--|--|
| 4.1 Undergraduate and postgraduate Coursework (including exams and assignments) | Current Academic Year +6 years | Programmes and Registry Hard copies and electronic copies of exams (when hard copies have been scanned) Online Turnitin submissions are downloaded at the close of every academic year | |
| 4.2 Research Theses (MTh or PhD) | Maximum of 2 copies retained indefinitely | Librarian Library | |

5. External Examiner records

| | | | |
|---|---------|-------------------------|----------------|
| 5.1 External Examiner reports and departmental responses. | 7 years | Programmes and Registry | Good practice. |
|---|---------|-------------------------|----------------|

6. Student Disciplinary Records/Appeals/Complaints

| | | | |
|--|------------------------------------|-------------------------|--|
| 6.1 Disciplinary cases where the outcome is permanent expulsion | Permanent | Programmes and Registry | |
| 6.2 Records documenting Student misconduct and disciplinary cases | Last action + 6 years | Programmes and Registry | |
| 6.3 Records documenting the handling of formal complaints made by individual students against the institution. | Last action on complaint + 6 years | Academic Registrar | |

7. Finance & HR

| | | | |
|---|--|---------------------------|----------------|
| 7.1 Student fee records | Delete after 7 years from last activity | Finance Office | Good practice. |
| 7.2 Bank details of payees | Immediately when contract ceases, unless practical reason for keeping records e.g. delayed payment | Finance Office | Good practice. |
| 7.3 External lecturers | Immediately when contract ceases, unless practical reason for keeping records e.g. delayed payment | Finance Office | Good practice. |
| 7.4 Staff & pension records | 6 years after leaving | Finance Office | Good practice. |
| 7.5 Donor details & TQ letters | 1 year from last donation | Finance Office | Good practice. |
| 8. Staff Records | | | |
| 8.1 Staff contact details | As long as staff are employed | Finance Office | Good practice. |
| 8.2 Potential mentor emails and enquiries | 1 year from end of active contact | Email system | Good practice. |
| 9. Health & Safety | | | |
| 9.1 Accident Forms | 7 years | IT administrator's Office | Good practice. |

APPENDIX 1 - STUDENT DATA PROCESSING FAIR PROCESSING NOTICE

PERSONAL INFORMATION STORED AND THE PURPOSES FOR WHICH IT IS USED

From the moment you contact the School we will create a record in your name; this includes contact details and the type of study which interests you. This is to service your enquiry. Please see the Data Retention Schedule (Section 6) of the UST Data Protection Policy for details about how long we store different types of information.

On receiving an application to a specific course, all the information which you have completed on your application form will be added to either a new or pre-existing record on the School database, and/or stored in a manual student file and/or in electronic files. We do this in order to:

- process your application
- provide services to you as either an applicant and/or a student (including providing such things as library and certain online facilities)
- identify and provide additional support or specific services for you if you have, for example, provided information about a disability; (We consider disclosure of this information as explicit consent to use this information for this purpose)
- provide information about overseas students to the UK Visa and Immigration Department to service their visa application
- produce statistical information for publication to the Open University (OU), and the Quality Assurance Agency (QAA) in line with government requirements); Please note that:
 - for enquirers and those who withdraw their application or place on a BA or MTh course, only the number of people who have applied in a specific year is passed on to the Open University
 - Statistical data passed on to the OU and the QAA is first anonymised
- provide information to other agencies when we are legally obliged to do so; this could include the Student Loan Company or a Local Councils regarding council tax exemption
- respond to requests for confirmation of your course status to your sponsor, if your fee or part of your fee is being paid for by sponsorship
- provide support for you when you have left the School by contacting you to invite your prayer requests or service your requests for information about your time at School; you will be given the option to opt out of receiving these communications
- contact alumni with newsletters or for fundraising purposes; you will be given the option to opt out of receiving these communications
- respond, at your request, to other outside agencies (for example, with proof of student status etc. or reference applications for prospective employers or educational establishments).

Correspondence relating to you, fee payments and data to do with examinations, assessments and course results and qualifications and other relevant information is stored for current and past students to support our academic and other services to you.

Photos of you are stored in electronic files and may be used in Union generated media (including social media, websites and written and electronic publications), and by signing the Student Contract, you give permission for your photographs to be used. You are within your rights to withhold permission for any and all photographic representations to be posted on any media during and after your time as a student at UST. If you wish to withdraw your permission, please contact the Data Protection Officer on academicregistrar@ust.ac.uk.

Information is stored in the School database and in student paper and electronic files. Your paper files are moved to the School archives after you have left the School. All data storage rooms are kept locked when empty and digital files are password protected.

TRANSFERRED INFORMATION

We are required to send some of the information we hold about you to the Open University (OU). This only applies to students who are registered on courses validated by the OU. This information includes contact details, date of birth, student number, programme details and progression and award details and is used by them to support your academic and other services to you. It is a condition of registration on an OU validated course that we provide this information to them. The OU's own Data Protection Guidelines provide further information on how this information is used by them.

SECURITY

We take security very seriously. All staff are made aware of the security procedures they must follow when handling your personal information. Information is protected from unauthorised access and we are confident no one will be able to access your personal information unlawfully. We also protect information which is being transferred (e.g. password protected). Generally information you provide to us is stored on our secure servers, or on our cloud based systems which are located within the EEA. If at any time we transfer your personal information to, or store it in, countries located outside of the EEA we will ensure that appropriate safeguards are in place for you.

ACCESS TO DATA

Under the General Data Protection Regulation, you have the right to receive a copy of the personal data the School has about you. If you wish to see your files, you can send a request to the Academic Registrar academicregistrar@ust.ac.uk.

MORE INFORMATION AND ADVICE

For more information and advice on data protection matters, contact the School Data Protection Officer, Emily Scally at academicregistrar@ust.ac.uk.

APPENDIX 2 - CONSENT TO USE PERSONAL DATA LETTER - STUDENTS

I understand that Union Foundation is the data controller. I hereby freely give my consent to Union Foundation obtaining, storing and processing the types of personal data listed, and in the manner described, in the prevailing UST Data Protection Policy document. I understand that I may at any time refuse my consent or withdraw my consent in writing.

Name

Signed

Date

APPENDIX 3 - CONSENT TO USE PERSONAL DATA LETTER - STAFF

I understand that Union Foundation is the data controller in respect of any employment matters which affect me as an applicant for employment, or as an employee. I hereby freely give my consent to Union Foundation obtaining, storing and processing the types of personal data listed, and in the manner described, in the prevailing UST Data Protection Policy document. I understand that I may at any time refuse my consent or withdraw my consent in writing.

Name

Signed

Date

APPENDIX NNN - DATA PROTECTION MONITORING FORM

| | |
|--|------------------------|
| Number of complaints received raised at School since last meeting | |
| If a complaint has been lodged: Nature of Complaint: (informal or formal): | Date complaint logged: |
| Description of Complaint: | |
| School response: | |
| Action to be considered to mitigate future risk? | |
| Any staff training to be implemented? | |

VERSION CONTROL

| Version | Author | Review Date | Reason for change | Equality Impact Assessment check (and comment) | AB Approval date * |
|---------|------------|-------------|--|--|--------------------------------|
| 1.1 | Iain McGee | Sept 2024 | Streamlining of data retention schedules in s.2, 3.1, 3.2 and 4.1. | Checked | 29 th November 2022 |