

PRIVACY NOTICE FOR STUDENTS AND APPLICANTS OF WREXHAM UNIVERSITY

This privacy notice applies to current and former students and applicants. It explains how we'll process your personal data. This notice does not form part of any student or applicant contract.

What information do we hold?

We hold a range of personal data about you, some of which you provide to us directly and some of which we receive from third parties.

Here are some examples of types of personal data we hold:

- your contact details
- prior educational experience and attainment
- immigration information (such as passport details and language proficiency)
- where relevant, health information (including any disabilities) and other equality monitoring data you provide to us

In addition, if you come to study with us, we'll start keeping data like:

- academic performance
- attendance and progression
- if it's relevant, breaches of our policies (such as academic or other misconduct concerning University activities)
- Location and login data gathered through logging into University Eduroam WIFI in campus buildings, including teaching and learning spaces and public areas.
- Username data gathered through logging into University Eduroam WIFI in campus buildings, including teaching and learning spaces and public areas. This is gathered solely to support the NHS Test and Trace system and is kept for a strictly limited period of time.
- Health information where a student either self-reports symptoms of infections illnesses, e.g. Covid 19 or Mumps, or where the University is informed by Public Health or NHS bodies.
- We will process physical attendance and monitor those who are unable to attend due to personal or national restrictions in place due to global health events

We also process contact and educational details after you stop being a student with us.

How do we use it and why?

When you're an applicant, we process your personal data for the purposes of assessing your eligibility to be offered a place on one of our academic programmes and for identifying any support needs you may have.

If you accept a place on a course and/or register as a student at the University, we process your personal data for the purposes of providing our academic programmes and related services, such as welfare support.

In general, this applies to personal data you provides to us to process your application and, if enrolled, to monitor academic performance. Without that information, we wouldn't be able to provide you with your chosen academic programme and related support services.

We pay attention to how you interact with us and may record this information. For example, whether you open or click on our emails, your interactions with University-operated social media accounts, and what you visit on our websites and use this information to personalise future interactions.

Some personal data is also required to fulfil our legal obligation regarding as a Student Sponsor of international students. A failure to provide that information would interfere with your application for a student visa.

We only process data for specified purposes and if it is justified in accordance with data protection law. The table below lists examples of personal data we process and the justification for it.

PURPOSE OF DATA USE AND JUSTIFICATION		
Purpose	Legal Basis	Justification
Receiving data from application partners (including but not limited to UCAS) from applicants that wish to study at Wrexham University	<ul style="list-style-type: none"> • <u>Contract</u> 	Applicants require trusted partners to transfer information to institutions for the purposes of assessing applications.
Assessing eligibility to undertake our academic programmes	<ul style="list-style-type: none"> • <u>Consent</u> • <u>Contract</u> 	Consent and/or processing is necessary for the purposes of taking steps prior to entering into a contract with us
Passing applicant details to partner colleges for the purpose of enrolling on foundation or pre-masters programmes	<ul style="list-style-type: none"> • <u>Consent</u> 	Consent is required before we transfer your data to partner colleges.
Provision of academic programmes and related services (including IT and library services)	<ul style="list-style-type: none"> • <u>Contract</u> 	Necessary for performing a contract - in other words to provide your chosen academic programme. This can be a contract with us or a contract between you and your sending institution. This is called contractual necessity.
Monitor your use of our networks to protect the security and integrity of the University's IT network and information and electronic communication systems	<ul style="list-style-type: none"> • <u>Contract</u> 	Contractual necessity
	<ul style="list-style-type: none"> • <u>Contract</u> 	Contractual necessity.

<p>Assessment of academic progress and performance (including attendance).</p>		
<p>To support investigations into the integrity of student contributions and assessments e.g. determining the originality of assessed work, the use of 3rd party services to provide solutions or answers on behalf of students.</p>	<ul style="list-style-type: none"> • <u>Contract</u> 	<p>Contractual necessity.</p>
<p>Operate security, disciplinary, complaint, and quality assurance processes and arrangements</p>	<ul style="list-style-type: none"> • <u>Contract</u> 	<p>Contractual necessity.</p>
<p>Monitor compliance by you with University policies and your other contractual and legal obligations</p>	<ul style="list-style-type: none"> • <u>Contract</u> 	<p>Contractual necessity.</p>
<p>Immigration compliance. If you require a student visa in order to study in the UK, we will need to process your data for purposes relating to immigration and visa applications. When you accepted an offer from Wrexham University we will have processed your information to issue the Confirmation of Acceptance of Studies (CAS) that you need in order to apply for a visa and to comply with our legal obligations under our Student Sponsor licence. This may have included sharing your data with UK Visas and Immigration (part of the Home Office within the UK Government). We will carry out similar processing in respect of any application you make to extend your visa. As for the initial processing to issue a CAS, we may need to share information with UK Visas and Immigration in order to obtain information relevant to your eligibility to extend your visa. For a visa extension we also have to process financial information including bank statements. If your reasons for seeking an extension include an illness you have suffered, we may also have to process information about your health for these purposes.</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> • <u>Public Interest</u> 	<p>Necessary for us to comply with our legal obligation in relation to students or applicants who hold student visa. Such processing may also be in the public interest and your consent may be required in some cases.</p>

<p>Making reasonable adjustments for disabilities and providing relevant support to students or applicants with ill health.</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> 	<p>Necessary for us to comply with our legal obligation under the Equality Act 2010, and for the establishment, exercise and defence of legal claims relating to the University's duty of care towards students and its obligations to comply with the Equality Act 2010.</p>
<p>Regulating the University's community (including dealing with misconduct under our procedures for academic and other misconduct)</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	<p>Contractual necessity and our legitimate interest in maintaining academic standards.</p>
<p>Obtaining payment of fees</p>	<ul style="list-style-type: none"> • <u>Contract</u> 	<p>Contractual necessity and our legitimate interest in obtaining payment for the services we provide.</p>
<p>Protecting our property and assets (for example by dealing with misconduct)</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	<p>Contractual necessity and necessary for our legitimate interest in safeguarding our property and assets.</p>
<p>Operation of CCTV including body worn cameras</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> • <u>Public Task</u> • <u>Legitimate Interest</u> 	<p>The University has a legitimate interest in ensuring that its property and assets are protected. The University has a legal duty of care to ensure the safety of its staff, students and visitors.</p>
<p>Providing appropriate IT and other infrastructure facilities, for example a virtual learning environment, as well as the development of new IT systems</p>	<ul style="list-style-type: none"> • <u>Contract</u> 	<p>Contractual necessity; legitimate interest in providing a proper infrastructure to support the provision of academic programmes and related student services</p>
<p>To manage health and safety incidents including statutory reporting and medical referrals</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> 	<p>Compliance with the Health and Safety at Work etc Act 1974</p>
<p>Communicating with applicants and students</p>	<ul style="list-style-type: none"> • <u>Contract</u> 	<p>Contractual necessity</p>
	<ul style="list-style-type: none"> • <u>Consent</u> 	<p>Consent</p>

Assisting applicants and students to obtain residential accommodation/housing		
Administering matters relating to University-managed accommodation including fees, health and safety, catering, cleaning and maintenance and disciplinary procedures	<ul style="list-style-type: none"> • <u>Contract</u> 	Contractual necessity. The accommodation service may use personal email addresses for the purposes of communicating with students.
Careers and Employability Service	<ul style="list-style-type: none"> • <u>Contract</u> 	Contact details, programme details and progression information where relevant to enable opportunities offered to students by the University's Careers and Employability Service.
Offering you beneficial alumni-focused services (for example, events and webinars with sector-leading experts, networking opportunities, mentoring and career advice, volunteering opportunities and the latest updates and news from the University.	<ul style="list-style-type: none"> • <u>Contract</u> 	Important to deliver an alumni relations service that benefits new graduates (up to 3 years post-graduation).
Internal Audit Service	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	Necessary for our legitimate interests in maintaining internal control, and/or prevention detection and investigation of fraud.
To provide references on request	<ul style="list-style-type: none"> • <u>Contract</u> 	Necessary for the performance of the employment contract or where consent has been given
Carrying out internal research and analysis for non-academic (research) purposes including monitoring performance and quality at an institutional level and where there is no direct impact on data subjects.	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	Legitimate interest in ensuring that the University is able to benefit its staff and students through understanding how they are impacted by its practices and enacting continuous improvement to its policies, processes and technologies.
Carrying out teaching and learning surveys to enable the University to plan teaching, learning and assessment, and support. There may be some data matching of participants' non-special category data	<ul style="list-style-type: none"> • <u>Consent</u> • <u>Legitimate Interest</u> 	Legitimate interest in ensuring that the University is able to benefit its staff and students through understanding how they are impacted by its practices and enacting

<p>from other University systems, but all outputs are non-identifiable. Consent is sought for any inclusion of special category data.</p>		<p>continuous improvement to its policies, processes and technologies.</p>
<p>Undertaking electronic student analytics of engagement to identify possible opportunities to support students with their studies, particularly where engagement appears low, and for students with student visas, to monitor and report on engagement as required by law</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> • <u>Legal Obligation</u> 	<p>The University's contract with students creates a duty of care to students; under-engagement may indicate greater support is required; the analytics systems can flag to students that they are under engaging and may indicated to the University that interventions may be appropriate.</p> <p>Students on student visas are required to engage with studies as a condition of their visa. Failure to do so necessitates a statutory obligation to report to UKVI.</p>
<p>Supplying contact details to the relevant council tax authority in registered place of residence for Council Tax Registration purposes.</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> 	<p>Consent is collected at the point of enrolment. Students that do not wish to consent must still register for Council Tax purposes with the relevant local authority</p>
<p>Supplying contact details to councils for electoral registration purposes.</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> 	<p>Legal obligation on request from Electoral Registration bodies under regulation 23 of the Representation of the People (England and Wales) Regulations 2001</p>
<p>For the purposes of obtaining professional accreditation for regulated courses.</p>	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	<p>Contact details, attendance, assessments and progression information, and employment destination following competition of studies.</p>
<p>For the purposes of conducting competitions and recognition schemes, making awards and giving prizes</p>	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	<p>Legitimate interests. There is a clear and established benefit to the University being able to run competitions and award excellence.</p>
<p>To maintain the health of our entire student population, by monitoring student movements around University campuses to enable effective Test, Track and Trace processes during global health events.</p> <p>To identify those affected through Health Screening and Self Reporting.</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> <p>The University is under a legal obligation to ensure health and safety of staff,</p>	<p>Compliance with relevant national health & safety legislation and any national legislation brought in in the event of a global health emergency.</p> <p>Legitimate interest in ensuring that the University is a safe and healthy</p>

	<p>students and visitors and those affected by its undertaking.</p> <p>It is in the University's legitimate interests (ensuing wellbeing and minimising risk to the public as well as the delivery and continuance of operations).</p> <p>It is in the public interest.</p>	<p>environment for staff, students and visitors.</p>
<p>To maintain a register of vaccination status for students working or on placement in the NHS and Health and Social Care in Wales.</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> 	<p>The law requires that anyone working or on placement in the NHS and Health and Social Care in Wales must be fully vaccinated unless medically exempt.</p>
<p>Using domestic email contact information to communicate with graduates for the purposes of administering graduation ceremonies.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	<p>Graduation ceremonies are not mandatory but are part of the expected university experience for most students and is covered by the student contract.</p>
<p>Passing student details to partner organisations to enable the administration of gown hire.</p>	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	<p>Graduation ceremonies are not mandatory but are part of the expected university experience for most students and is covered by the student contract.</p>
<p>Processing Disclosure and Barring Checks as part of the University's application procedure and entry requirements for regulated courses.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	<p>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.</p>

<p>To provide faith, spirituality and belief and non-faith based support to students through the University's Chaplaincy Team including pastoral and listening services support.</p>	<ul style="list-style-type: none"> • <u>Consent</u> • <u>Legal Obligation</u> • <u>Vital Interests</u> 	<p>Where you have consented to processing of your personal data for these purposes; where it is necessary for the University's compliance with a legal obligation (e.g. safeguarding and Prevent duties); where it is necessary to protect your vital interests or the vital interests of another person.</p>
<p>For the purposes of debt collection where you fail to meet your financial obligations to the university (e.g. payment of tuition fees).</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	<p>Contractual necessity; legitimate interest in the collected of debts owed to Wrexham University.</p>
<p>For the marking of your assessments and examinations, and in discussions and decisions about the award of marks, grades and degrees.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> 	<p>Contractual necessity; performance of the University's core public task (i.e. delivery of higher education and research).</p>
<p>For the management of teaching quality and academic standards. We will provide overall feedback based on feedback or evaluations you have given in relation to your study experience to University staff who manage and deliver a course from feedback on or evaluations of your study with a view to security appropriate improvement to the course and delivery of a course. This information will usually be provided on an unnamed basis unless you chose to provide your name. All personal data will be anonymised in internal and external reporting of results.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> 	<p>Contractual necessity; performance of the University's core public task (i.e. delivery of higher education and research).</p> <p>Within our teaching, learning and support services, we use your data to ensure that we maintain appropriate academic standards.</p>
<p>For the purposes of managing procedures relating to academic appeals, complaints and offences. This includes sharing your data with the Office of the Independent Adjudicator for Higher Education (OIA) if you decide to refer any matter to the OIA and with organisations operating anti-plagiarism on our behalf (e.g. Turnitin®)</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> 	<p>Contractual necessity; performance of the University's core public task (i.e. delivery of higher education and research).</p> <p>If you issue an academic appeal relating to any aspect of your course or if there is a concern that you may have committed an academic offence, we will process your data as necessary to apply Wrexham University policies and procedures in relation to these matters and the</p>

		Wrexham University student contract. This includes processing information about the work you have undertaken on the course and your academic performance and progression, including information about marks awarded to your work or examination scripts.
For the management and delivery of your course. The data processed for these purposes will include a wide range of information we collect from you and from third parties, and which is generated through your contact with us. This will include contact information, education history and employment information, the details of your course, your progression and your academic performance.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> 	Contractual necessity; performance of the University's core public task (i.e. delivery of higher education and research).
To provide you with, and ensure you are able to access, all relevant elements of our core teaching, learning and research services in accordance with the Wrexham University student contract, and the facilities which form part of the core Wrexham University student experience. Our processing will include the making of arrangements for teaching, assignments, supervision meetings, examinations and other elements of your course content or requirements and communicating with you about them.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> 	<p>Contractual necessity; performance of the University's core public task (i.e. delivery of higher education and research).</p> <p>This processing is necessary to enable you to develop and improve academically with a view to obtaining the academic standard required to achieve the degree qualification associated with your course.</p>
Where, following completion of Wrexham University processes, you decide to refer a matter to the Office of the Independent Adjudicator for Higher Education for determination of whether Wrexham University has complied with its policies, we are required to provide the OIA with full copies of material taken into account under our processes and this will include sharing your personal data.	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	Necessary for legitimate interests pursued by Wrexham University (i.e. complaint with the OIA process).
For the processing of applications for mitigation/special consideration. We process information about requests from students for consideration of mitigating	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> • <u>Consent</u> 	Necessary for the performance of the contract between you and Wrexham University; necessary for the performance of Wrexham University's core public task

<p>circumstances which may be affecting their academic performance, in particular their ability to meet deadlines for submission of assignments or other course requirements.</p>		<p>(i.e. delivery of higher education and research); you consent to the processing.</p>
<p>To provide you with access to library and learning resources relevant to your study at Wrexham University.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> 	<p>Necessary for the performance of the contract between you and Wrexham University; necessary for the performance of Wrexham University's core public task (i.e. delivery of higher education and research).</p>
<p>For the purposes of administering bursaries/scholarships and hardship funding. We will process information about your personal and family circumstances, academic performance and extra-curricular interests and academic performance and progression where this is relevant to the assessment of your suitability to receive a bursary/studentship or scholarship or your eligibility of hardship funding support.</p> <p>In relation to hardship funding, we may need to process information about your financial position (e.g. bank statements in order to determine your eligibility for funding).</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	<p>Necessary for the performance of the contract between you and Wrexham University; necessary for the legitimate interest pursued by Wrexham University (i.e. enabling access by students to additional funding support).</p>
<p>For the administration and facilitation of work placements, student projects and exchange programmes.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> • <u>Legitimate Interest</u> 	<p>Necessary for the performance of the contract between you and Wrexham University; necessary for the legitimate interest pursued by Wrexham University (i.e. enabling access by students to opportunities relevant to academic study and/or future career opportunities).</p>

There may be other processing in addition to the above, for example, when you access our website which uses cookies, or when we take photos or video of our events and publish them. This is done on the basis of our other policies, and we will inform you about such processing at the time when the data is obtained or as soon as we can afterwards.

Where the basis of processing your personal data is a contractual necessity and you don't provide us with the personal data needed, the University may not be able to process your application or provide you with the

programme for which you have applied. A failure to provide immigration-related data may result in failure to obtain a student visa for those students who require it.

What information do we get from third parties?

Sometimes we receive your data from third parties. The following table lists what information we may receive from them.

WHO DO WE GET DATA FROM?	
Source	Data we may receive
UCAS/Centaurus/Recruitment Agents	Application data, which includes contact details and attainment, work experience, previous institution, contextual data and disability information.
Home Office (UKVI), Foreign and Commonwealth Office	Your immigration status.
Another institution and/or secondary schools	Transcripts (details of programmes undertaken or being undertaken at another institution, and your attainment)
Another institution, medical/health practitioners and/or family members.	Medical, accessibility related and similar information, occupational health medical clearing (we only obtain this information from third parties if you give us consent to do so).
Student Loans Company	Your financial status.
Office of the Independent Adjudicator (OIA)	Details of any University associated complaint.
Your employer if you are an apprentice.	Details as to how you are performing in your apprenticeship.
Partner institutions and agents.	Details of performance in courses delivered in whole or in part by other education institutions on behalf of the University or for courses for which the University is the relevant awarding body (e.g. affiliated colleges, overseas campuses, exchange institutions, including those outside of the UK).
Referees you have identified.	

	Details of performance in other educational institutions or in relevant jobs.
Disclosure and Barring Service	Information relating to criminal convictions and barred lists.
Relevant professional accrediting bodies	Accreditation information.
Debt collection service providers engaged by the University	Your fee status and fee liabilities, for payment or non-payment of fees and your contact details.
Work placement, student project and exchange programme organisations and providers.	Where your course involves undertaking a work placement, a project which is delivered to a third party customer or a student exchange (i.e. where you undertake a period of study at a separate education provider) it will be necessary for your data to be shared between Wrexham University and the other organisation. We are likely to share your name, contact details and information about your course at Wrexham University and your education and employment history in order to arrange the placement, project or exchange. We will ask the third party to share information with us about your attendance and activities within the placement, project or exchange, including performance and progression information. This process will be applicable to overseas students who undertake a placement at Wrexham University.

Who do we share it with?

Sometimes we may need to share your data. The following table gives examples of this kind of data sharing.

WHO WE SHARE DATA WITH	
Recipients	Data which we may share with them
Our academic staff	Contact details, attendance and progression information, education and attainment data, and where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent health information. Your contact details may also be used by these staff when recruiting to related extra-curricular activities, such as volunteering opportunities.
Our administrative and support staff	Contact details, immigration details, attendance and progression information, education and attainment data, and where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent health information. Your

	contact details may also be used by these staff when recruiting to related extra-curricular activities, such as volunteering opportunities
Wrexham University Student Union	Contact details and student record details where relevant to enabling opportunities offered to students by the Union, where required for the purposes of supporting the efficient and effective engagement of all eligible students in the democratic functions of WUSU, to support the inclusion of representatives of WUSU (including student representatives) on University committees that may include discussions about, or the provision of, data or statistics that could potentially include that of identifiable persons (including other students); to support the efficient and effective communications of WUSU services to all students; to support the administration of all elections, and membership activity; to enable effective management and planning of WUSU services and facilities; to support any investigations, or matters pertaining to, student safety, wellbeing, safeguarding or the prevention or detention of crime in order to ensure a safe and secure environment for students, staff and visitors' and to comply with any legal obligation to which either party is subject.
Partner institutions offering foundation courses	If you express an interest in undertaking a foundation or pre-masters programme before progressing to Wrexham University, we may pass your contact details, course of interest and academic background to the partner institution in order for them to contact you further.
Employment or study placement providers	Your CV as well as any accessibility and assistance requirements and related information.
Co-curricular and/or extra-curricular excursion providers	Accessibility and assistance requirements and related information.
Your employer if you are an apprentice	Details as to how you are performing in the academic part of your apprenticeship.
Future employers	Personal information relating to conduct, performance and academic achievement, where we are asked for a reference.
University league table compliers, for example, the Economist, Financial Times and organisations compiling graduate destination data.	Contact details and employment or further study destination data.

Official bodies to which the University is obligated to report, for example HESA and the Higher Education Funding Council Wales and their agents	Information supplied as necessary to fulfil the University's reporting obligations to these bodies. This may include relevant special category data.
External Examiners	Identification details and exam papers and assessment records.
Home Office (UKVI)	Passport details, programme details and fees, and housing details.
Third party accommodation/housing providers	Student details.
Data processors (in other words third parties who process personal data on our behalf, such as software providers)	details, attendance records, contact information & account credential where required for single sign-in.
Local authority	Contact details.
Student Loans Company	Contact details.
Research Partners	Contact details, attendance and progression information
Regulatory and accrediting bodies, where you are on a professionally accredited programme	Contact details, attendance, assessments and progression information
Funding bodies, scholarship and bursary providers	Contact details, attendance and progression information.
Government agencies, for example HMRC (only upon request and where there is a legal basis for doing so)	Contact details.
Police and other law enforcement agencies (only upon request and	Information supplied as necessary in order to fulfil the University legal obligations with respect to fire prevention and detection of crime.

where there is a legal basis for doing so)	
NHS Test & Trace and PHE (or its replacement)	We may share your contact details and information on your movements around University Campuses in order for them to identify individuals who you may have been in contact with or who may have been in contact with you. This is done in order for them to contact individuals where self-isolation may be required.
Partner institutions and agents	Details of performance in courses delivered in whole or in part by other education institutions on behalf of the University or for courses for which the University is the relevant awarding body (e.g. affiliated colleges, overseas campuses, exchange institutions, including those outside of the UK).

HOW WE PROCESS PARTICULARLY SENSITIVE INFORMATION

Purpose	Legal Basis	Justification
We use information to comply with our statutory reporting obligations to official bodies e.g. example HESA and the Higher Education Funding Council Wales and their agents	<ul style="list-style-type: none"> • Legal Obligation • Public Interest • Legitimate Interest <p>It is necessary for research and statistical purposes under Article 9(2)(j) UK GDPR.</p>	<p>We provide some of this information under the legal framework in the Higher Education (Wales) Act 2015 or for a task in the public interest, or for legitimate interests, and always for research and statistical purposes. We do not ask for your consent to provide this information to HESA. This processing is not on the basis of consent, once you have given us the information. If you have questions or concerns about HESA's use of your information which are not answered by the HESA privacy notice, you should contact HESA directly using the contact details provided in its privacy notice</p> <p>In addition to the annual data report to HESA, we also, with your consent, provide your name, course details and contact information to the organisation which acts on behalf of HEFCW to carry out the National Student Survey. This is an annual survey of higher education students' views about their course and higher education provider which is used to create published feedback about and ratings of courses and providers, and</p>

		generally to drive improvements in higher education provision. The organisation which acts on behalf of HESA to carry out the survey currently called the Graduate Outcomes Survey.
Where your course requires you to undertake work placements within healthcare settings, it is necessary for you to undergo an occupational health assessment to identify any risks or issues which may affect your ability to complete the placement and any needs you have for specific support in your placement, e.g. due to health conditions or disability.	<ul style="list-style-type: none"> • <u>Employment, social security and social protection law</u> • <u>Public Task</u> 	Necessary for healthcare purposes, including assessment of working capacity, medical diagnosis, provision of treatment or the management of healthcare arrangements. Necessary to protect your vital interests or those of another person, i.e. to prevent or manage significant risks of harm Necessary for the purposes of substantial public interest: safeguarding vulnerable people
If you provide us with information about your personal circumstances, including health or disability related information, on the basis that this is relevant to any appeal, complaint or allegation, then we will process this information as necessary to complete the relevant Wrexham University process and share it with the OIA if you refer the matter to them.	<ul style="list-style-type: none"> • <u>Explicit Consent</u> 	We will only process this information with your explicit consent.
For the processing of applications for mitigations/special consideration and the reason for the request relates to special category data such as health conditions or disabilities.	<ul style="list-style-type: none"> • <u>Explicit Consent</u> 	We will process this as necessary for determining your request and implementing any special arrangements which are agreed.
Where you provide information relating to health conditions or disability in support of an application for hardship funding or other financial support	<ul style="list-style-type: none"> • <u>Explicit Consent</u> 	We will process this information for the purposes of considering your application and administering payments.

When do we transfer data overseas (outside of the United Kingdom)?

As shown in the table above, we will share your data with your placement provider, who may be outside of the UK, on the grounds that such transfer is necessary for performing our contract with you.

Wrexham University also works with suppliers and partners who may make use of cloud and/or hosted technologies.

We undertake due diligence on our partners, ensure that suitable contracts are in place and that these partners conform to appropriate accreditations.

Wherever these transfers take place, the University will have an appropriate contract in place and there are strict rules regarding the confidentiality and security of your information in place to safeguard it.

How long do we keep your data?

Usually application-related personal data will be kept for around one year.

Contractual information (for example details of your attendance, performance and contact details) is retained for six years after you have completed or otherwise terminated your programme. Retention periods are usually linked to legal limitation (statute of limitation) periods. [The University's records retention schedule is available online.](#)

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Data Protection Officer, Wrexham University, Plas Coch, Mold Road, Wrexham, LL11 2AW or dpo@wrexham.ac.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Data Protection Officer, Wrexham University, Plas Coch, Mold Road, Wrexham, LL11 2AW or dpo@wrexham.ac.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.


The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

Where can I get more information?

If you have any questions about this policy, please contact dpo@wrexham.ac.uk.

We will keep this privacy notice under regular review and we will place any updates on this web page. 

This privacy notice was last updated on 17/03/2026.