

General Data Protection Regulation (GDPR) Privacy Notice

General statement

Liverpool School of Tropical Medicine (LSTM) takes your privacy very seriously in all our interactions with you. As part of your application and education at LSTM we will need to collect information about you which will be used solely to enable those activities.

Our policy is outlined below and we will refer to it on the occasions when we have need to communicate with you. We will keep this policy up-to-date by amending it when we make any changes to the way we handle your personal data.

In the UK, the processing of personal data is governed by the General Data Protection Regulation (enforced from 25 May 2018).

Purpose: Collection of personal data to manage your application and student records to study at LSTM.

What information is being collected & what is the legal basis for collecting the data?

“Personal data” is any information relating to a living individual, and 'processing' is any activity carried out involving personal data, including holding and storing it. To process your application and, if accepted onto a course, manage the processes around award, LSTM will obtain, hold and process data pertinent to each stage of the process. For example, at application stage we will collect information including:

- Personal Information (ie. names, addresses, e-mail addresses, date of birth, etc..)
- Sensitive Personal Information (sexual orientation, racial and ethnic origin, biometric data, physical or mental health condition, etc..)
- Financial Information
- Immigration Information (for visas, UKVI)

Throughout your studies, we will hold data on your assessment marks, academic progress, and monitor your attendance.

It may be necessary to collect sensitive or special categories of data, e.g. racial and ethnic origin, religious or philosophical beliefs, biometric data and physical disability / mental health condition or learning disability, etc This data is needed to comply with reporting requirements with the Higher Education Statistics Agency (HESA) and other similar statutory bodies. Where possible and appropriate, data is anonymised.

Student personal data is collected and processed by LSTM as it is necessary for the performance of the contract under which we provide services to students. Some processing activities may also be carried out under a legal obligation (for example, disclosing personal data to external parties under statutory powers), where it is necessary to protect the vital interests of the student or another party (for example, disclosures to external parties to ensure the safety and wellbeing of individuals), where it is necessary for the performance of a task carried out in the public interest or in the

exercise of official authority (for example, collecting or disclosing information in order to meet regulatory or statutory requirements), or where it is necessary for legitimate interests pursued by LSTM or a third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of the interests or rights of individuals). Where any of these legal bases do not apply, the consent of an individual to process their personal data will be sought.

Where students' sensitive personal data/special category data is collected and processed by LSTM, this will be on the legal basis of explicit consent of the student, employment or social security/protection requirements, protecting the vital interests of the student or another party, the exercise or defence of a legal claim, reasons of substantial public interest, purposes of medical or health care, or where the information has been made public by the student. Any processing will be proportionate and relate to the provision of services by LSTM. When this data is used for monitoring and reporting purposes it will be anonymised if possible.

Only information required for the purposes of student recruitment, admission, registration, teaching and learning, examination, graduation and other services such as accommodation, student support and careers is collected and processed. Without it LSTM would not be able to provide its service to you.

Who is collecting it?

LSTM is collecting your information when you make your application to us to study via our online recruitment student information system (Salesforce). Salesforce is a US based cloud software company which is widely used worldwide and what LSTM use for their application and student/staff portals. LSTM is the Data Controller and GDPR compliance is with LSTM.

How is the information collected?

We collect the data that you personally input into our student information system (Salesforce). Other information collected may include your references which can come to us direct, emails you have sent to us which are relevant to your application are also uploaded to your application so all information is stored in one place. You have the right to request sight of your references at any time. The system is a cloud service which is hosted offsite in the USA. We may also transfer some of this information to our internal network systems for processing in relation to the course you are on. We have a retention schedule in place and retention of all your personal information is in accordance with this.

How the information is being used, stored and protected?

- a) LSTM also uses student's personal data to put in place support measures such as:
- b) To allow our Student Support Team to contact you when a disability is declared to confidentially discuss available support.
- c) To provide progress reports to sponsors of students (except relatives).
- d) To provide references to education institutions and employers, with the consent of the student or graduate.

- e) To publish of the names of graduating students in the degree ceremony graduation programme.
- f) To disclose information about students and graduates for the purpose of promoting LSTM, but only with the consent of the student or graduate if they are personally identified.
- g) To support your academic studies and progress
- h) For the purposes of academic writing support and plagiarism prevention
- i) To supply personal and financial details to providers of financial services engaged by LSTM, for example for the payment of fees, refunds, loans and similar services.
- j) To disclose information to external parties for safeguarding and duty of care purposes, for example to medical practitioners and law enforcement agencies.
- k) To produce degree certificates and transcripts for students.
- l) To ensure graduates of LSTM can access our Alumni resources.
- m) Subject to review on a case-by-case basis, to providing contact details to third party companies and organisations formally engaged by LSTM to provide enhanced levels of service to support core activities.

LSTM takes appropriate measures to keep your data secure.

Who will the information be shared with?

Within LSTM, access to your personal data is restricted. Only relevant personal data will be shared with teams and individuals, to enable them to deliver appropriate services. This will include:

- IT Services
- Technology Enhanced Learning Unit
- Library
- Academic and Support Staff

Data including your name, e-mail address and course enrolment data will be transferred to LSTM's Technology Enhanced Learning systems, to provide you with access to the technologies, content and support you will use during your studies with LSTM. This will include:

- Brightspace – online learning environment
- Panopto – lecture capture technology
- Turnitin – assessment submission, feedback management, originality checking and plagiarism prevention service
- Ebsco – library catalogue and reading list system
- YouSeeU – virtual classroom tool

LSTM contracts with all our TEL systems suppliers to ensure they are obligated to act only on our instructions and in accordance with applicable laws, including GDPR.

LSTM may disclose students' personal data and sensitive personal data/special category data to external agencies to which it has obligations; for example for council tax, electoral registration, and visa and immigration purposes, and to other arms of central or local government, to the Office for Students, Higher Education Statistics Agency (HESA), Student Loans Company, NHS Bursaries, Office of the Independent Adjudicator for Higher Education, Research Councils, and potentially other such organisations for defined purposes. It may also disclose information to examining bodies, legal representatives, Police or security agencies, suppliers or service providers, survey and research

organisations engaged by LSTM, and regulatory authorities. If students are in receipt of a scholarship, information may be shared such as a short student profile with donors. Disclosure of information may also be involved in our safeguarding processes such as the LSTM Prevent Strategy to prevent harm in line with the Counter-Terrorism and Security Act 2015.

If students have unpaid debts to LSTM at the end of their course, we may, at our discretion, pass this information to debt collecting agencies in order to pursue the debt.

LSTM requires all students to participate in its attendance monitoring system. For some student groups it is a statutory requirement that we monitor attendance (for example some international students) and there may be a requirement to report non-attendance to official bodies (e.g. UK Visas and Immigration, Student Loans Company). It also aids us in our duty of care and support provisions, as well as enabling the analysis of specific elements of service provision such as space management.

In some instances, LSTM may transfer students' personal data to third parties located in other countries, including some outside of the European Economic Area. Any such transfers will be strictly in relation to the delivery of LSTM's core services, including to partner institutions abroad. IT services used by LSTM may involve the transfer or hosting of student personal data overseas. Personal data may be shared with international agents that LSTM uses for the delivery of services to overseas students. All instances of overseas transfers of personal data are subject to appropriate technical safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the data and full compliance with legislative and regulatory requirements.

Some sections of LSTM undertake processes involving applicant or student personal data that include elements of profiling. Examples are some parts of the Student Recruitment Office and Admissions Office, where these processes are employed to determine the nature of communications sent to individuals and to facilitate student recruitment and admissions procedures.

Your contact details may be passed to survey contractors to carry out the Postgraduate Taught Education Survey (PTES) and the Postgraduate Research Education Survey (PRES) by the Higher Education Academy (HEA) and surveys of student finances on behalf of some of the organisations listed in the Higher Education Statistics Agency (HESA) statement at the link below. These organisations and their contractors will use your details only for that purpose, and will then delete them.

Within six months to eighteen months of graduation, LSTM may contact you to ask you to fill in the HESA 'Graduate Outcomes' survey. You may also be contacted as part of an audit to check that we have undertaken this survey properly.

You may also be included in longitudinal surveys of leavers in the years after you graduate. If so, we will pass your contact details to the organisation that has been contracted to carry out that survey. That organisation will use your details only for that purpose, and will then delete them.

There is no requirement for you to take part in any of these surveys but participation assists LSTM, as well as government and regulatory bodies, in performing their statutory, official and public duties. If you do not want to take part in any of these surveys please contact LSTM's Data Protection Officer.

It is a statutory requirement for LSTM to send some of the information we hold about you to HESA ("your HESA information"). HESA is the official source of data about UK universities and higher education colleges www.hesa.ac.uk. HESA collects, and is responsible for, the database in which your HESA information is stored. HESA is a registered charity and operates on a not-for-profit basis. HESA uses your HESA information itself for its own purposes. HESA also shares your HESA information with third parties for specified and lawful purposes. It may charge other organisations to whom it provides services and data. HESA's use of your HESA information may include linking information from it to other data, as described in the HESA statement linked to below. All uses of HESA information must comply with the Data Protection Act 1998 and the General Data Protection Regulation.

If you give us information about your disability status, ethnicity, sexual orientation, gender reassignment or religion these will be included in your HESA information and used to assist with monitoring equality of opportunity and eliminating unlawful discrimination in accordance with the Equality Act 2010, even when answers are 'refused to answer' or 'preferred not to say'. Some other sensitive information is used to enable research into the provision of fair access to higher education, for example information as to whether you are a care leaver. If you are enrolled at a higher education provider in England regulated by the Higher Education Funding Council for England (HEFCE) your HESA information will include details of any financial support you may receive. Your sensitive personal data/special category data will not be used to make decisions about you.

Where students are registered, or supervised, at more than one institution (joint awards, partnerships), personal and student data will be shared between the organisations in order to facilitate your studies and to fulfil each organisations requirement for statutory reporting.

In some instances, LSTM may transfer students' personal data to third parties located in other countries, including some outside of the European Economic Area. Any such transfers will be strictly in relation to the delivery of LSTM's core services, including to partner institutions abroad. IT services used by LSTM may involve the transfer or hosting of student personal data overseas. Personal data may be shared with international agents that LSTM uses for the delivery of services to overseas students. All instances of overseas transfers of personal data are subject to appropriate technical safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the data and full compliance with legislative and regulatory requirements.

LSTM Alumni – Once students have completed their studies, students are invited to join our alumni association to be kept in touch with LSTM news. This is still governed by GDPR rules and alumni can opt-out, unsubscribe or change their preferences at any time.

To read the full HESA student data collection notice please visit:

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>

Retention of data and updating your information

LSTM retain your data in line with our retention policy. You can request this information via our Data Protection Officer.

LSTM need to hold information such as lists of graduates due to requests for copies of certificates, employers and official bodies often request verification of graduation. All other application data held will be deleted in line with our document retention policy.

How will the collection of data affect the data subject?

Students should also be aware that, in certain circumstances, LSTM may monitor usage of its IT systems and access user information on its systems and networks that is normally private. Any institutional monitoring or access will comply with UK legislation including the Regulation of Investigatory Powers Act 2000, Human Rights Act 1998, and the Data Protection Act 1998 and General Data Protection Regulation. Where necessary any access or monitoring will be justifiable, fair and proportionate in accordance with our Acceptable Use of Computer and IT Facilities within LSTM policy.

Your rights and how to find out what information we hold about you

LSTM is the data controller for all personal data that it holds and processes, except where it is done in the capacity of a data processor on behalf of another data controller.

Individuals whose personal data and sensitive personal data/special category data is held by LSTM have the following rights regarding their data:

- a) The right to request access to their personal data held by LSTM.
- b) The right to have inaccurate or incomplete personal data rectified.
- c) The right to erasure of personal data (also known as the right to be forgotten) – this will only apply where there is no legitimate reason for LSTM to continue to process the personal data. There will usually be a requirement for LSTM to keep a basic student record indefinitely in case of requests regarding replacement certificates and transcripts, and for our own reporting purposes. Sensitive personal information will be removed
- d) The right to restrict the processing of personal data – individuals have the right to block the processing of their personal data by LSTM in specific situations.
- e) The right to data portability – students have the right to request provision of some elements of their information (for example academic progress details) in digital form in order to provide it to other organisations.
- f) The right to object – students can object to the processing of their personal data by LSTM in certain circumstances, including the sending and receipt of direct marketing material.

Where the processing of personal data or sensitive personal data/special category data is based on the consent of the student, they have the right to withdraw their consent at any time by contacting mylstm@lstmed.ac.uk who obtained that consent or the LSTM Data Protection Officer.

All requests to exercise any of these rights should be made to LSTM Data Protection Officer.

How to contact us

If you would like further information about our privacy policy or to make an access request for your personal data, please contact us at:

Head of Information Services (Data Protection Officer)
The Library
Liverpool School of Tropical Medicine
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Liverpool
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United Kingdom

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