



# Student Privacy Notice

## 1. Introduction

The University is committed to ensuring that the personal data of its applicants, students and alumni is handled in accordance with the principles set out in the Data Protection Act 2018, and in the UK and where relevant EU, General Data Protection Regulations.

Cranfield is registered as a [data controller](#) with the Information Commissioner's Office and will collect and use information about students in accordance with the [data protection principles](#). Acceptance of the terms of this notice is a condition of registration.

## 2. What information do we collect about you?

In order to carry out its duties as a University, Cranfield must collect and process data, to include [sensitive personal data](#) relating to its students.

A record relating to your studies will be held by The Registry, within Education Services. For students studying as part of an apprenticeship, a record relating to your apprenticeship will be held by the Apprenticeship Office. Information about your studies may also be held by individual departments for example - Security may hold data with regard to your access to site, CCTV images etc.

Data held about you may include, but is not restricted to, the following:

- Application forms, qualification certificates and other recruitment data such as English Proficiency test outcomes and evidence of prior learning;
- Personal details such as name, date of birth, diversity data and contact and next-of-kin and emergency contact details;
- Visa details and copies of passports;
- Bank or building society account details;
- Sponsor details;
- Salary and rank/grade details,
- Records concerning progression, changes to your registration, exceptional circumstance requests, marks and awards;
- Sickness and other absence details;
- Contracts and terms and conditions, of study;
- Correspondence between the student and Cranfield;
- Correspondence, such as references, between Cranfield and third parties on behalf of a student;
- Records of grievances, complaints or disciplinary proceedings;
- Investigations into breaches of terms and conditions of being a student;
- Health and safety records (including accident reports);
- personal data collected and processed for research purposes, including research into human behaviour and human factors and biometric data, collected through facial recognition cameras and other sensors (in particular for our research into digital aviation technologies).

### 3. How will we use information about you?

The University processes student personal data in order to:

- Review academic progression and achievement.
- Review and support progression on and completion of apprenticeships.
- Assess eligibility and generate contractual documentation for students that are funded through sponsorship or other funding streams (e.g., ESFA funded apprenticeships).
- Pay any maintenance bursary/stipend into your bank account.
- Monitor attendance to show engagement with studies and where required in line with UKVI and ESFA guidelines.
- Enable staff to undertake their roles in general administration
- Contact a nominated emergency contact if necessary.
- Publish the online staff/student directories of contact details.

#### 3.1 Who has access to your data?

Where data is held by Education Services, access to manual and electronic personnel files is carefully controlled and may only be seen by selected members of the Education Services community, and other persons, as authorised by the Academic Registrar.

Access to personal data held by individual departments will be limited in accordance with that department's operational needs.

#### 3.2 Sensitive personal data

The University recognises the significance of sensitive personal data and will only process such data if certain conditions are met. These conditions are outlined in [guidance](#) from the UK Information Commissioner's Office.

At Cranfield, we ask you to declare diversity data (protected characteristics) at the time of your application. This data falls within the definition of sensitive data. If you choose to provide such data, you give your consent for Cranfield to use this, in aggregated form, for statistical purposes.

Your student file may also contain sensitive personal data in relation to health or sickness, maternity or paternity leave or Student Support Plans. These records will be kept in strict confidence and will not be released to third parties without your explicit consent, unless special provisions apply for the release of such data.

### 4. Sharing and disclosing your personal information

The University may disclose certain personal data to external bodies as categorised below. At all times, the amount of information disclosed and the manner in which it is disclosed will be in accordance with the provisions and obligations of data protection legislation. Please note this is not an exhaustive list.

Disclosure to	Details
Home Office, UK Visas and Immigration	In order to fulfil the University's obligations as a visa sponsor.
Verifile, the Disclosure and Barring Service (DBS) and National Security Vetting (NSV)	Required for certain sensitive posts to assess applicant's suitability for positions of trust or where the post works with vulnerable people or children.
UK Research and Innovation (UKRI)	Data submitted for the Research Excellence Framework (REF) which is a system for assessing the quality of research in higher education.

Disclosure to	Details
UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offender, collection of a tax or duty, or safeguarding national security*	<p>As necessary, and with appropriate consideration of your rights and freedoms (such as Benefit or Tax Inspectors, the Police, UK Visas and Immigration, or the Foreign and Commonwealth Office).</p> <p>* such as the Department of Work &amp; Pensions, Police, UK Visas and Immigration, or the Foreign and Commonwealth Office.</p>
Higher education funding and regulatory bodies and their designated agencies including OfS, HESA, Jisc and Graduate Outcomes	Some information will be sent to HESA/Jisc for statistical analysis and to allow government agencies to carry out their statutory functions. You are advised to refer to the <a href="#">HESA/Jisc student collection notice</a> for further details.
Education and Skills Funding Agency and their partners	Some information will be sent to ESFA to satisfy the funding requirements for apprenticeships. The University are subject to audit of the Evidence Packs held for each apprentice containing personal data, employment data and training records.
End Point Assessment Organisations (EPAOs), including independent Assessors working for those EPAOs	End Point Assessment organisations will require access to apprentice's evidence portfolios.
Third party software suppliers	Where external computer systems are required to facilitate the purposes listed in section 3, student data may be shared with software suppliers. Any such transfer will be subject to a formal agreement between the University and those suppliers, to ensure protection of your personal data. Example: systems underpinning authentication to Library subscription databases.
Student survey agencies relating to Higher Education ranking tables.	Where a third-party agency contacts Cranfield to assess student feedback on the University for ranking purposes. The student's personal email address will be provided to the third-party agency.
Virtual Learning Environments	Your details are provided to Canvas and/or Blackboard and Moodle Virtual Learning Environment companies in order for you to access online material related to your study.
Turnitin	Your details are provided to Turnitin to enable you to submit assessments for marking, during your studies.
Partners/Sponsors	If you are a student studying at a partner organisation or have a company/corporate sponsor, your details and information will be shared as per contractual agreements.
Debt collection agencies	Your details may be shared with debt collection agencies where an outstanding debt is owed to the University.

## 4.1 Other disclosures to third parties

The University may, from time to time, need to make other disclosures of your personal information without your consent but any such disclosures will be made in accordance with relevant data protection legislation with due consideration of your rights. Any such transfer will be subject to a formal agreement between the University and those suppliers, to ensure protection of your personal data.

In addition, if requested to do so by a legitimate public authority Cranfield University will share your name, contact details and time of visit for contact tracing purposes to control the spread of Covid-19.

## 5. Handling of DBS Certificate Information

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of students for positions of trust, Cranfield University complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. We also comply fully with our obligations under data protection and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

**Storage and access** - Certificate information is kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

**Handling** - In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. The University maintain a record of all those to whom certificates, or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Once the inspection has taken place the certificate should be destroyed (see disposal).

**Usage** - Certificate information is only used for the specific purpose for which it was requested and for which the student's full consent has been given.

**Retention** - Once a student has completed their studies, the University does not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

**Disposal** - Once the retention period has elapsed, the University will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g., waste bin or unsecured confidential waste sack).

The University will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates.

We do not routinely ask for criminal records information from student enquirers or student applicants.

## 6. How long we keep your personal information

The University will keep your personal data only as long as is necessary to conclude the purpose(s) for which it was collected and in accordance with the Data Retention Schedule.

Applicable data will be securely destroyed when no longer required.

If you wish to find out more about the processing of your student data, contact [registrymanager@cranfield.ac.uk](mailto:registrymanager@cranfield.ac.uk).

The University is committed to ensuring that any concerns are dealt with quickly and fairly, and with due concern for the individuals involved. However, the University recognises that individuals may continue to be dissatisfied. If you wish to complain about the University's processing of your personal data you are entitled to complain to the Data Protection Officer who will nominate a Senior Officer of the University, who has not been involved in the original enquiry, to deal with your complaint.

Data Protection Officer  
Cranfield University  
Cranfield  
Bedfordshire  
MK43 0AL  
e: [gdpr@cranfield.ac.uk](mailto:gdpr@cranfield.ac.uk)  
t: +44 (0) 1234 754536

We may occasionally carry out profiling or automated decision-making processes, for example, to direct you to the most appropriate web page for information, or to send you the most appropriate communication. If you have specific questions on this please email [gdpr@cranfield.ac.uk](mailto:gdpr@cranfield.ac.uk).

You retain the right at all times to lodge a complaint about our management of your personal data with the supervisory authority, in the UK this is the Information Commissioner's Office (ICO). The ICO will expect you to complain to us first and give us an opportunity to resolve the matter before contacting them. The ICO contact details are given below.

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Web page <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

Live chat service [ico.org.uk/livechat](https://ico.org.uk/livechat)

ICO helpline on +44 (0) 303 123 1113

## 7. Access to your information and correction

Students may request a copy of the personal data held about them by Cranfield. This applies to all records held in the University's manual or electronic files including any records held on mobile devices. If you wish to make such a request, please write to:

University Data Protection Officer  
Executive Office  
Cranfield University  
Cranfield  
Bedfordshire  
MK43 0AL

If you wish to correct any information held by the University about you, please contact [dataprotection@cranfield.ac.uk](mailto:dataprotection@cranfield.ac.uk).

## 8. Website

The Cranfield website privacy statement explains how data may be gathered about users of the University's website. The University's privacy notices do not cover the links within the Cranfield site which link to other websites. We suggest you read the privacy statements on other websites you visit.

## 9. How to contact us

If you require further information about data protection, please refer to the [University Intranet pages](#).

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## Document Review

Version	Amendment	By	Date
V1	New		
V2	Review and additions of information relating to Apprenticeships	C Greening	16.12.19
V3	Review and addition of reference to Covid-19 reporting, data collected during research	I Pugh	30.11.20
V4	Amended references to relevant data protection legislation	I Pugh	16.12.20
V4.1	Correction to section 4 (third party/software suppliers - may share student data, not staff)	I Pugh	30.09.21
V5	Contact point added for students with questions about their data processing and external complaint information added to section 6	I Pugh	09.03.22

V6	Updated complaints information. Updated name from Learning Support Agreements to Student support Plans. Updated HESA Collection Notice.	I Pugh	19.07.22
V6.1	Updated HESA Collection Notice.	I Pugh	06.10.22
V6.2	Updated section on HESA Collection Notice to include Jisc	I Pugh	18.11.22
V6.3	Updated references to OfS and UKRI	I Pugh	18.05.23
V6.4	Updated HESA/Jisc collection notice. Reference added to EPAO assessors and supporting apprenticeship completion. Reference added to debt collection agencies, emergency contacts and criminal records information. Inclusion of statement on automated processing or AI.	I Pugh	16.12.24