



PRIVACY NOTICE FOR STUDENTS

A privacy notice is a document that provides clear and concise information about various aspects of our data handling practices as an educational institution. It outlines our identity, the methods, and purposes behind collecting and utilizing your personal information as a student, the specific types of personal information we gather, the legal grounds we rely on to process your data, the parties we may share your information with, the duration we retain your data, and most importantly, how you can assert your rights as a data subject.

WHO WE ARE

Throughout this notice “we”, “our” and “us” refer to Futureworks. We are a higher education institution offering teaching, education, and all necessary services to support those who study with us. Futureworks is the Controller in respect of the personal information we hold about you. We manage all personal information in accordance with the Data Protection Act 2018 and our Data Protection Policy.

THE DATA WE HOLD ABOUT STUDENTS

The personal information we may process about you as a student includes:

- Your unique student number and other examples of unique system IDs. E.g., UCAS personal ID.
- Your personal details and contact information; including: name, term-time and holiday addresses, date of birth, gender, phone numbers, e-mail addresses and your photograph.
- Information about your trusted / emergency contact.
- Information provided as part of your application to study at Futureworks or created during the application process. E.g., personal statement, education and employment history, interview scores, notes, and references.
- Information about your learning, examinations, assessments, results, academic marks, progress, modules completed, placements conducted, and qualifications awarded.
- Attendance information, such as lecture attendance, leave of absence, authorised absence, and exclusion data.
- Information provided in relation to extenuating circumstances, exceptional factors, appeals and complaints.
- Information about fitness to practice, plagiarism, disciplinary and other misconduct issues.
- Information about your use of our library services, such as: your borrowing history, fines, and reservations.
- Information about your engagement with our counselling and support services.
- Financial information, such as tuition and other fee charges, funding, and payments.
- Information about honours and prizes you have been nominated for or have won.
- Information about your caring responsibilities.
- Closed Circuit Television (CCTV) images. Futureworks operates CCTV around its estate for security and crime detection purposes. You may be recorded whilst entering some of our premises.
- Your leaving date and reason for leaving your programme of study.
- Other legitimate personal data relating to academic and pastoral support.

SPECIAL CATEGORY AND CRIMINAL CONVICTION INFORMATION

In addition to above, we may need to collect, or you may choose to provide us with information which is classed as ‘special category’. We may ask for your consent to use this type of information. This includes:

- Information revealing your race or ethnicity, religious beliefs, sex life or sexual orientation (whether indicated by your gender or gender identity) and political opinions. Such information will only be processed where you have volunteered it and where we need to process it to meet our statutory obligations under equality and other legislation. The use of this information is considered to meet a substantial public interest and will be subject to suitable safeguards.
- Information about your health, including any disability or medical condition, and dietary requirements. We will collect and use this information where it is necessary to make reasonable adjustments for disability and to



monitor equal opportunities. Processing of this nature is necessary to meet our legal obligations under equal opportunities legislation. There may also be situations where we ask for your explicit consent to use and share information about your health. It may also be necessary in exceptional circumstances to use and share health information to protect your vital interests or those of another person.

- We may hold information about unspent and relevant criminal convictions and offence information if you have self-disclosed as part of the admissions process or at re-registration.

We make sure that access, use of and the sharing of your special category personal information is controlled very carefully.

WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

The information you provided to us within your application to study with us, whether via the Universities and Colleges Admissions Service (UCAS) or direct application, forms the basis of your core student record. We also obtain your information:

- From you when you express an interest in applying to study with us, e.g., when requesting a prospectus, registering to attend our open days, or making contact with us.
- From you as part of enrolling / registering and annual re-registration with us.
- From you, collected, entered, and observed about you as you engage with us during your studies, and as we deliver our teaching and education services to you.
- From you as you register, access, and engage with the different services or resources that we offer as a Higher Education Provider. E.g., careers advice, library services, IT services, counselling, disability and wellbeing services, pastoral care, and financial support services etc.
- From third parties during the application and admissions process, e.g., UCAS, referees, such as from your previous or current school, college, university or employer, and Government departments such as the Home Office and the Student Loans Company.

THE PURPOSES OF THE PROCESSING

To operate efficiently as a higher education institution and ensure you receive the necessary support for your studies, academic achievements, and compliance with legal obligations, we require the collection and utilisation of your personal information. This personal information is essential to provide you with a range of services and carry out specific activities, including:

- To administer and deliver our teaching, education, and related services to you, such as delivery of your course, academic support and development, academic assessment, and supervision.
- To administer and deliver our student services and facilities to you, e.g., student services, library, IT, pastoral care, and counselling, disability, and wellbeing services.
- To monitor student attendance at lessons, leave and absence, the submission of assessment and engagement with course materials on Moodle.
- To conduct graduate outcome activities and analysis, which feed into the HESA reporting explained further below under the 'The recipients or categories of recipients of the personal data' heading.
- To conduct research and analysis, including learner analytics and student predictive analysis, with the aim of improving our support available, improved student satisfaction, retention, and attainment.
- To administer academic appeals and extenuating circumstances.
- To offer careers and employability support.
- To administer the financial aspects of your relationship with us and any funders, including the administration of financial awards and prizes, such as scholarship, bursaries, hardship funding and grants.
- To keep you safe whilst on our premises.
- To appropriately manage safeguarding and wellbeing concerns.
- To review and improve the standard of our education services and business. E.g., through surveys and feedback.
- To administer job applications and employment contracts where you are employed by us.



- To manage misconduct, complaints and disciplinary activities, investigations, including plagiarism, academic and non-academic misconduct.
- To administer, investigate and manage complaints and appeals brought against us.
- To fulfil and monitor our legal obligations under equalities, immigration, and public safety legislation.
- To conduct ethical approved internal and external research initiatives involving student information which are judged in the public interest, and do not target or make measures in respect of individual students.
- To invite you to take part in internal and external research opportunities which we think will be of interest to you.
- To register you as a member of the alumni community upon graduation.
- To satisfy statutory reporting requirements to the Higher Education Statistics Agency.
- To satisfy statutory reporting requirements to the Electoral Registration Officer for Manchester to maintain registers of parliamentary and local government electors.
- To communicate effectively with you by post, e-mail, phone, or other electronic media, including the distribution of relevant newsletters and information.

We do not use your personal data to carry out any wholly automated decision-making that affects you. As part of our layered approach to delivering our privacy notice information to you, many of these services and activities have specific privacy notices which contain further information.

WHAT ARE OUR LAWFUL BASES FOR PROCESSING?

We rely on the following lawful bases from Article 6 of the GDPR to use your personal information for the purposes outlined above.

- Where it is necessary to meet a task in the public interest – we provide our teaching, education, research, and all related and necessary support services to you as a public authority acting in the public interest with a clear basis in law under the ‘public task’ lawful basis. Teaching, education, and research are tasks that we perform in the public interest to fulfil our responsibilities as a higher education institution for promoting the advancement of learning. Our clear basis in law is s124 of the Education Reform Act, which states that a higher education corporation has the power to provide higher education, to carry out research and do anything which appears to the corporation to be necessary to pursue its aims in this respect. For further information and a full explanation of our activities which we carry out under public task, please see our Statement of Tasks Carried Out in the Public Interest.
- Because we have a contract with you or with a view to entering into a contract with you. We assess your application to study with us and provide you with the services set out in the Terms & Conditions as per the ‘contract’ lawful basis. E.g., recruitment and admissions activities, provision of teaching, education and our student services, and provision of accommodation.
- Where we need to comply with a legal obligation – where we are legally obliged to conduct an activity. E.g., the need to use your information relating to the monitoring of equal opportunities, immigration requirements, anti-money laundering legislation, health and safety, and safeguarding laws, preventing and detecting crime, assisting the police and other authorities with their investigations, and as required by law to provide data to the Higher Education Statistics Agency (HESA), regulatory and other governmental bodies.
- Where it is necessary to meet our legitimate interests as a Higher Education Provider – whenever we use the legitimate interest lawful basis, we undertake a legitimate interests assessment to ensure that our, your and others’ legitimate interests are balanced against relevant privacy concerns.
- Where you have given us your consent – there will be occasions where we give you genuine choice and we ask for your consent for specific uses of your information. The method used to obtain your consent will depend on the scope and context. Examples include disability services, marketing, and promotional activity and in order to make disclosures to parents or other third parties at your request.
- Where it is necessary to protect vital interests – in exceptional circumstances it may be necessary to share or use your information in a way which we believe will protect you or another individual from serious harm.



As part of our layered approach to delivering our privacy notice information to you, many of these lawful bases are explained further within specific privacy notices.

THE RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

To perform our legal responsibilities, contractual and other purposes set out above, we may, from time to time, need to share your information with third parties as follows:

- To the HESA, the body responsible for collecting and disseminating information about higher education in the UK and the Designated Data Body for England. This includes disclosure of your contact information to HESA to support various surveys including the [Graduate Outcomes Survey](#) which takes place 15 months after you graduate. For further information please refer to the [HESA Student Collection Privacy Notice](#).
- To your funders and sponsors, including the Student Loan Company and Student Finance.
- The University of Central Lancashire (UCLan) for the purposes of registration for your award.
- To external examiners for the purpose of assessment.
- To external agents in relation to the repayment of student debts, where internal recovery attempts have been unsuccessful.
- To the Police, Home Office, HM Revenues and Customs, UK Visas and Immigration, and other governmental bodies where pursuant to the investigation of crime, national security, immigration, tax, and benefit matters.
- To our insurers and external regulators such as the Health and Safety Executive in respect of accidents or incidents.
- To printing, mailing, and marketing agencies who assist us, under contract, to communicate with you.
- To your trusted / emergency contact and the emergency services in respect of emergency situations. e.g., where your physical or mental health or wellbeing, or safety is at risk.
- To potential employers and other educational institutions requesting a reference for a current or past student (consent is implied by providing Futureworks' details as a referee). This includes confirmation of awards.
- To our IT providers supplying, supporting, and hosting our IT services, and other data processors acting on our behalf.
- To local authorities (primarily Manchester City Council, but potentially other neighbouring authorities) - in relation to council tax exemption, administration of housing benefit and for processing care leaver bursaries.
- To the Electoral Registration Officer for Manchester, disclosure of information of all enrolled students so that the officer may maintain registers of parliamentary and local government electors under s23 power to require information of the Representation of the People Regulations 2001.
- To the Office for the Independent Adjudicator (OIA) if you raise a complaint.
- To our banking and online payment processing service suppliers.

Where we use third parties to support us and provide services on our behalf (acting as data processors), a written contract will be put in place to ensure that your information will be held in accordance with the requirements of data protection legislation and that such data processors have appropriate security measures.

Parents, family members and other guardians are considered to be third parties and your information will not be disclosed to them unless you have given your consent for relevant information in certain circumstances to be shared, or we believe the disclosure is otherwise made in accordance with data protection legislation.

THE RIGHT TO WITHDRAW CONSENT

Where we collect, use, and share your personal information with your consent we will provide you with specific privacy notice information at the appropriate time. You can withdraw your consent at any point. To do so you are encouraged to refer to the privacy notice which we provided to you when we collected your information or when we sought your consent to use your information in a specific way.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the use of your personal information conducted in reliance of other lawful bases.



DATA RETENTION

Your personal information will only be retained by us for as long as it is necessary for the purposes outlined above. Many of our retention periods are aligned to other higher education institutions and JISC standards.

Most of our information about your application to study with us, registration, your study with Futureworks as a student, academic progress, assessments, attendance, and your engagement with our support services will be retained for six years after your graduation or departure date, after which your information will be securely disposed of.

Core student information about you, e.g., your studies and academic awards (name, dates of study, courses studied, main academic details, units, marks, and classification etc) will be retained indefinitely.

We maintain a detailed schedule which sets out our retention and disposal periods.

YOUR RIGHTS IN RESPECT OF THE PROCESSING

The GDPR provides data subjects with the following rights:

- The right to be informed – we seek to collect and use your personal information in a transparent manner. We fulfil this right using privacy notices such as this main Student Privacy Notice and our other privacy notice information provided at the point of collecting your information and available from our website.
- The right of access - Unless relevant exemptions apply, you have the right to be told whether we hold your personal information and, if so, to be given a copy of it. This is known as the right of access or subject access. The right exists to support individuals to be aware of, and verify, the lawfulness of the processing by organisations.
- The right to rectification - If you believe that the information we hold about you is inaccurate or incomplete, please contact us and we will investigate. If your information is inaccurate, we will rectify it. If it is incomplete, we will complete it. Once we have determined what we are going to do, we will contact you to let you know.
- The right to erasure - also referred to as ‘the right to be forgotten’. This right is not absolute and applies only in certain circumstances. If you submit a request, once we have determined whether the right applies and what we are going to do, we will contact you to let you know.
- The right to restrict processing – this right is not absolute and applies only in certain circumstances. If you submit a request, once we have determined whether the right applies and what we are going to do, we will contact you to let you know.
- The right to object – this right is not absolute and applies in certain circumstances. Where applicable, in the first instance, please use unsubscribe links in any of our communications or use the contact information we provided within the privacy notice used at the point of data collection. If you submit a request, once we have determined what we are going to do, we will contact you to let you know.
- The right to withdraw consent – where we use consent as our lawful basis for the processing of your personal information, you have the right to withdraw your consent at any time. In the first instance, please use unsubscribe links in any of our communications or use the contact information provided within the applicable privacy notice.

ALUMNI

On graduation, your information is passed to our Alumni Team so you can be automatically registered as a member of the alumni community. We do this so we can maintain a lifelong alumni and supporter relationship with you. You may receive information relating to alumni activities, such as news, events, and careers information.

HOW TO CONTACT US

For questions or concerns about this Privacy Notice, or our use of your personal information, please contact our Data Protection Team using dataprotection@futureworks.ac.uk or in writing to: Data Protection Officer, Futureworks, Riverside, New Bailey Street, Manchester, M3 5FS.



RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) as the supervisory authority for data protection. We would encourage you to use our internal complaints procedure through our Data Protection Officer, prior to contacting the ICO. Please contact: casework@ico.org.uk or telephone: 0303 123 1113. For any further contact information please see: <https://ico.org.uk/global/contact-us/>.

UPDATES TO THIS PRIVACY NOTICE

We may update this privacy notice from time to time in response to changing legal, technical, or business developments.

This privacy notice was last updated on: **25th May 2023**.