



# HARTPURY

## General Privacy Notice

APPROVAL & REVIEW CYCLE		
Policy Owner/Reviewer	Director of Digital Services	May 2025
Approved By	Exec	August 2025
Interim-Review	No	-
Next Review Date		May 2026

## About This Document

This privacy notice explains how Hartpury University and Hartpury College ("Hartpury", "we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold.

Hartpury collects and processes personal data to function effectively as an educational institution, to meet our statutory responsibilities and to provide students with the support they require whilst undertaking their studies and staff with the support they need for their roles. Personal data is processed for a variety of reasons (as set out below) and all such personal data will be collected and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

This privacy notice concerns the processing of personal data of past, present and prospective students and staff, self-employed contractors and consultants, voluntary workers and honorary and associate staff or users ("you", "your") of services provided by Hartpury in relation to the processing of your personal data.

In this notice:

- **personal data** means any data which can identify an individual directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This does not include data that has been manipulated so that you can no longer be identified from it (anonymous data) but does include data that is pseudonymised (encoded data).
- **processing** means any activity relating to personal data including collection, use, alteration, storage, disclosure and destruction.

Unless Hartpury processes your personal data on behalf of another organisation for purposes that have been determined by that organisation, Hartpury University and Hartpury College is the data controller of your personal data (ICO Registration numbers Z1591909 & ZB165599).

## Changes To This Notice

Hartpury may update this notice at any time. You should check this notice regularly, which is available to view on the Hartpury website, to take note of any changes.

## How We Collect Your Information

We may collect your personal data in several ways, for example:

- from the information you provide to us when you interact with us before joining as a student or member of staff, for example when you express your interest in studying by booking a place on our open day, or working (for example by applying for a post) at Hartpury.
- when you apply to study at Hartpury directly or via the Universities and Colleges Admissions Service (UCAS), when you complete the enrolment process and when you complete other admissions processes and procedures and register as a student with Hartpury.
- when you communicate with us by telephone, email or via our website and social media, for example to make enquiries or raise concerns.

- when you use Hartpury resources, services and systems and have other interactions with Hartpury for the various purposes set out below.
- from third parties, for example from UCAS, other institutions that deliver joint programmes with Hartpury, Government departments such as the Home Office, the Student Loans Company, organisations with whom you undertake placements or work experience and your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies.
- from interactions you have with us or third parties with whom we work to deliver commercial and other activities, such as sporting events.

This is not an exhaustive list.

### **The Types Of Information We Process**

Only personal data about you that is relevant and consistent with the interaction you have with Hartpury is processed. Depending on your relationship with us, we may collect some of the following types of personal data about you:

Your name and contact information such as address (term time and holiday addresses), email address and telephone number, date of birth, national insurance number (or other tax identification number), passport number or national identity card details, country of domicile, residency, first language, biometric data, nationality and ID photo and unique system IDs (e.g. UCAS personal ID), information relating to right to reside/work in the UK.

Information provided as part of your application to study or work at Hartpury or created as part of the interview process (e.g. interview notes etc).

Information relating to your education, the school(s), FE college(s), universities or other education providers you have attended, the courses you have completed, dates of study and examination results and any disciplinary information. We will also keep records relating to attendance, assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record.

Employment history, including the places you have worked, courses completed and references from previous educational institutions or employers.

Information about your family or personal circumstances, including financial information, for example where this is relevant to the assessment of your suitability to receive a bursary or to provide you with appropriate pastoral care.

Information about academic and extracurricular achievements and interests, for example a personal statement to assess your suitability to study on a course.

Contact details and names of parents/carers/next of kin

Information about your work, study and/or living support needs in order to provide you with the appropriate working, learning and/or living environment.

Visa and immigration information (including visa and passport details) which could impact on learning or on the quality of service we provide.

Information provided in relation to extenuating circumstances, appeals and complaints

Caring responsibilities.

Video surveillance footage whilst on campus, photographs and video footage during teaching, events or other activities.

Other legitimate personal data relating to academic and pastoral support and health and safety obligations.

We may also collect, or you may be required to provide us with, the following **special categories** of more sensitive personal data which require additional steps to ensure their security and confidentiality:

- information revealing your race or ethnicity, religious beliefs, sexual orientation (whether or not indicated by your gender or gender identity) and political opinions.
- information about your health, including any disability or medical condition, and dietary requirements.
- information about criminal convictions or offences.

### **Personal Data Provided by You About Others**

You may provide us with personal data about other individuals, for example, emergency contact details and information about your family circumstances and dependents (for example to assess bursary and grant eligibility and provide pastoral care services). Students should notify the relevant person that they are providing their contact details to Hartpury.

### **How We Use Information About Our Students and Our Staff**

The purposes for which we may process the personal data (including sensitive personal data) that we collect during a staff/student's association with us include:

recruitment, administration of processing applications, admissions and enrolments (including compilation of statistics).

to fulfil our legal obligations as an education provider and employer, to share with the DfE, OfS and other agencies, and our public task of providing students and employers with the most appropriate learning opportunities and the best possible education, training and pastoral support to meet their goals, and to appoint and support staff in their roles.

to provide educational services which may not be set out in the Student Agreement, but which are nevertheless a part of our academic and educational mission.

to maintain and improve Hartpury's academic, corporate, financial, estate and human resource management.

academic matters, including:

the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, behaviour management, managing progress, personal supervisors and tutors and academic departments, academic misconduct investigations, certification, prize day, graduation)

maintaining student records/staff records to comply with statutory obligations and obligations to our students and staff

assessing your eligibility for bursaries and scholarships, etc.

provision of references

supporting provision of work placements, work experience and employee training and development

to monitor and evaluate the performance and effectiveness of Hartpury, including by training our staff or monitoring their performance.

non-academic matters in support of our core services, including:

administering student support services (e.g. disability and additional learning support, innovation, careers and employability, library, IT and information services, health and wellbeing (including counselling), student medical support, sports performance monitoring and injury management).

monitoring equal opportunities and to promote equality and diversity.

gathering information about the destination of an individual once they have left Hartpury and contacting individuals who have completed a course at Hartpury

safeguarding and promoting the welfare of students.

where it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional).

ensuring students' safety and security.

managing the use of social media.

provision and management of Hartpury owned and privately owned property for students e.g. managing car parking on campus.

administering finance (e.g. fees, scholarships and bursaries, recovery of debts owed and the use of debtor information to make decisions e.g. to withhold bursary payments, prevent reregistration and eligibility for graduation ceremonies).

promotion of Hartpury (for example, providing information about programmes which may be of interest to you, summer schools etc.).

other administrative purposes, including:

carrying out research and statistical analysis.

auditing compliance with regulatory and legal obligations and policies.

to seek advice on our rights and obligations, such as where we require our own legal advice.

providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice).

promoting our services (e.g. providing information about summer schools, student exchanges, or other events, including commercial events on and off campus).

preventing and detecting crime (for example video surveillance, security incident reports)

dealing with grievances, appeals and disciplinary actions.

provision of unique ID including cards - students will be allocated a unique student number and staff a unique staff number.

dealing with complaints and enquiries.

for fundraising purposes.

contacting individuals for marketing purposes (Hartpury will seek consent where we wish to use personal information for other purposes such as marketing or surveys).

Hartpury will also use student/staff personal data to produce non-identifiable statistical data for analysis to fulfil its commitment to equality monitoring, to provide a more targeted response to improving the student experience, and to respond to freedom of information requests.

### **Lawful Grounds for Processing Your Personal Data**

We will only use your personal data when we are permitted to do so by law. Most commonly, we will use your personal data:

**to perform a contract** Hartpury has entered into with you or take steps before entering into a contract with you at your request (for example, as part of the admissions process and once you have enrolled as a student, to provide you with the services set out in the Student Agreement and/or Terms and Conditions).

**to comply with Hartpury's legal obligations** for example, complying with immigration, anti-money laundering, health and safety and safeguarding laws, preventing and detecting crime, assisting the police and other authorities with their investigations.

**to perform tasks carried out in the public interest** which are mainly set out in Acts, Statutes, Ordinances and Regulations.

**where necessary for our legitimate interests** or those of a third party provided the individuals' interests and rights do not override those interests (for example, providing services that do not form part of the Student Agreement, monitoring the effectiveness and performance of Hartpury's teaching, promoting equality and diversity, providing administrative and management services and recovering monies owed to us).

**to protect your vital interests** or those of another person (for example where we know or have reason to believe that you or another person may suffer harm).

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your consent. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your **explicit consent** unless a condition applies which allows us to process such personal data without doing so.

## **Sharing Information with Others**

Where there are lawful grounds for doing so, Hartpury may share your personal data with certain third parties. Examples of this include, but are not limited to:

individuals employed or engaged by Hartpury, to the extent necessary to perform their duties.

third parties who are next of kin, parents, family members and guardians, identified through your application or registration, if you have given your consent, are under 18 years of age or 18-25 if subject to an Education, Health and Care Plan (ECHP).

third parties who work with Hartpury to provide student accommodation.

third parties who work with us to provide student support services (e.g. counselling and out-of-hours IT services)

third parties who run or provide event services, including but not limited to sporting bodies.

organisations operating anti-plagiarism software on our behalf.

internal and external auditors.

those with an interest in tracking student progress and attendance, including:

student sponsors (e.g. research sponsors, research councils, NHS).

current or potential education providers (for example, where you take part in an exchange programme as part of your course).

current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance).

external examiners

professional, awarding and regulatory bodies (e.g. Royal College of Veterinary Surgeons for the purpose of assessing fitness for practice) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses.

government departments and agencies where we have a statutory obligation to provide information (e.g. the Office for Students (OfS), Education and Skills Funding Agency (ESFA), the Higher Education Statistics Agency (HESA), the Home Office (in connection with UK visas and immigration), Ofsted).

Student Loans Company and other bodies involved in student finance (for example, Student Awards Agency Scotland, Student Finance England, Student Finance Wales, Student Finance Northern Ireland, Student Finance European Union) - to allow students to receive their loans

Department for Education and Local Education Authorities

local authorities in relation to Council Tax exemption, maintaining the electoral roll and administration of housing benefit

wider support departments (e.g. social services and Children's Services)

Local Authority (e.g. to support Safeguarding Review processes)

crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards).

parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure)

third parties conducting surveys, for example the National Student Survey.

agents assisting Hartpury with international admissions (limited to what is strictly necessary for the performance of the agent's role) - this may include the disclosure of personal data outside the European Economic Area

other education institutions, including link schools, partners or research organisations where a student's programme is being run collaboratively, or where such parties host students for elements of their programme (for example, other universities, colleges, schools and industry bodies)

third parties performing administrative functions on behalf of Hartpury (acting as data processors) - where Hartpury uses third parties to process personal data on its behalf, a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data

work placement providers, employers and/or sponsors

debt collection agencies

the Government and local authorities during information gathering exercises when Hartpury is legally obliged to provide data

potential employers and other educational institutions requesting a reference for a current or past student (consent is implied by providing Hartpury's details as a referee). This includes confirmation of awards.

academic and research staff for the purposes of research (potentially involving disclosures to external organisations or regulators, under contract and properly assessed) – steps will be taken to protect your identity, which will not be published, and data will not be used to take decisions about you individually.

any other authorised third party to whom the Hartpury has a legal/contractual obligation to share personal data with or to otherwise comply with the law.

Please note that in emergency situations where Hartpury deems it to be in your (or potentially a third party's) 'vital interests', your personal data may be shared with relevant individuals/agencies, such as the Police.

Please be aware that we are unable to share information that relates to others when the request does not fall within the areas listed above.

## **International Data Transfers**

Some of the personal data we process about you may be transferred outside of the European Economic Area (EEA). Hartpury will only transfer data to countries outside the EEA when satisfied that both the party which handles the data and the country it is processing it in provide adequate safeguards for personal privacy.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to appropriate safeguards for international transfers.
- where we have your explicit consent.
- contractual obligation.

## **Student Related – Marketing Materials**

Hartpury processes personal data contained in its marketing and publicity content including photographs, videos, case studies, quotes, and profiles, for legitimate institutional interests. These interests include promoting the institution, courses, celebrating student achievements, highlighting events, and enhancing Hartpury's reputation.

Under the legal obligations of the General Data Protection Regulation (GDPR), Hartpury has specific responsibilities in terms of how these are collected, retained, and published.

## **Student Related - Hartpury Alumni Association**

Your personal data may be shared with our Hartpury Alumni when you graduate or finish your course.

Hartpury Alumni processes your personal information for carefully considered purposes, which we believe will be of benefit to you. Processing enables us to improve our relationship with you and includes some or all of the following purposes:

- to enhance and personalise services and communications for the benefit of Alumni Association members.
- to accurately monitor and report our graduate and leaver outcomes.
- to identify and prevent fraud.
- to better understand how people interact with our websites.
- to provide postal and/or telephone communications which we think will be of interest to you.
- to determine the effectiveness of alumni events and campaigns.
- fundraising programmes - we may also disclose limited personal data to our contractors for analysis in connection with fundraising activities.

## **Student Related - Prize Day, Graduation and Degree Information**

Personal data (including award and classification) will be published in the awards ceremony booklet. This information may also be passed to third parties involved in the ceremonies (which may include any commemorative clothing suppliers). You may advise us to withhold your consent to your name being used for these purposes when you confirm your attendance. All award ceremonies are broadcast online and will be available to view online afterwards.

## Changes To Your Personal Data

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details.

Applicants	<a href="mailto:Admissions@hartpury.ac.uk">Admissions@hartpury.ac.uk</a>
College Students	<a href="mailto:Mis@hartpury.ac.uk">Mis@hartpury.ac.uk</a>
University Students	<a href="mailto:Student.advisors@hartpury.ac.uk">Student.advisors@hartpury.ac.uk</a>
Staff	<a href="mailto:HR@hartpury.ac.uk">HR@hartpury.ac.uk</a>

## How Hartpury Keeps Your Personal Data Secure

Hartpury has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, Hartpury limits access to your personal data to the persons and organisations described above who have a need to access it.

Hartpury has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

## How Long Your Information Is Kept

Hartpury must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, Hartpury has taken into account:

- the nature, sensitivity and volume of the personal data.
- the potential risk of harm to you arising from Hartpury's continued retention of the personal data.
- the purposes for which Hartpury may process your personal data.
- whether Hartpury is required to retain any personal data by law or in accordance with its legitimate interests.

Relevant correspondence in relation to your application and studies will generally be held by Hartpury and retained for six years after your graduation or departure, after which time it will be securely disposed of. Core information about your studies and academic awards (e.g. dates of study, courses studied, main academic details etc.) will be retained indefinitely.

In some cases, Hartpury may anonymise your personal data so that it can no longer be identified with you, in which case Hartpury may retain such data indefinitely.

If notice of a legal claim or other proceeding is received, then Hartpury may retain and process relevant personal data to defend the claim for the duration of the same.

Whilst Hartpury may dispose of any personal data after the conclusion of the claim, please be aware that all litigation documents disclosed, or evidence given, may be a matter of public record.

Unless you opt out, Hartpury Alumni will retain your personal data indefinitely for the purposes of supporting your lifelong relationship with us.

### **Contact Directories**

The name and Hartpury email address of all staff and students will be included in the Hartpury email address book, the contents of which are accessible to all Hartpury staff and students, but not to external audiences.

### **Your Responsibilities**

You must ensure that any personal data collected and processed by you in the course of your work or studies is held in accordance with the Hartpury's Data Protection Policy. Any research involving the use of personal data should only be conducted following an ethical review. You have a responsibility to ensure the personal details we hold about you are up to date.

### **Your Rights**

Under the GDPR and DPA 2018 you have the following rights:

Informed	to be informed about how we collect and use your personal data. We inform you via this Privacy Notice.
Access	<p>to access the personal information Hartpury holds about you, which is known as a Subject Access Request (SAR). Information about making Subject Access Requests can be found on our website.</p> <p>Generally, SARs are free of charge however Hartpury may charge a 'reasonable fee' if a request is manifestly unfounded or excessive, particularly if it's repetitive. The fee will be based on the administrative cost of providing the information. You will be notified where a fee will be charged.</p> <p>to receive from us the personal data we hold about you which you have provided to us, in a reasonable format, including for the purpose of you transmitting that personal data to another data controller.</p>
Erasure	to have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.
Rectification	to correct inaccuracies or, where appropriate and taking into account the purpose for which we process your data, the right to have incomplete data completed
Objection	to object to the processing of your personal data for marketing purposes.

	to object to the processing of your personal data, for example when that processing is based on specific criteria such as the public interest, unless we have compelling lawful, statutory grounds to continue.
Restriction	to restrict the processing of your personal data, unless we have compelling lawful, statutory grounds to continue. Where the legal basis of our processing is based on your consent, you may withdraw that consent at any time, without affecting the lawfulness of our processing based on consent before its withdrawal.
Portability	to ask for the transfer of your data electronically to a third party where technically feasible;

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

To exercise any of these rights please contact Hartpury's Data Protection Officer at [dpo@hartpury.ac.uk](mailto:dpo@hartpury.ac.uk). Hartpury may be entitled to refuse any request in certain circumstances, and you will be notified accordingly where this is the case.

Where the lawful grounds relied upon by Hartpury to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. If you wish to withdraw it, please contact the Data Protection Officer using the contact details set out below. Please note, if you do so, Hartpury may not be able to provide some or all of its services to you or the provision of those services may be affected.

To protect the confidentiality of your personal data the Hartpury may ask you to verify your identity before fulfilling any request in relation to your personal data.

### Contact Us

If you have any queries about this privacy notice, how we process your personal data or to request access to the personal data that we hold about you please contact the Data Protection Officer by email: [dpo@hartpury.ac.uk](mailto:dpo@hartpury.ac.uk), or by post: Data Protection Officer, Hartpury University and Hartpury College, Hartpury, Gloucester, GL19 3BE.

If you are not satisfied with how we are processing your personal data, please contact the DPO in the first instance, and then our complaints process before considering making a complaint to the Information Commissioner.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

## **Freedom Of Speech**

As part of this policy, Hartpury reaffirms its commitment to the principles of freedom of speech and academic freedom, in accordance with the Higher Education (Freedom of Speech) Act 2023 and guidance from the Office for Students (OfS). Hartpury will take all reasonably practicable steps to secure the right to express lawful views and engage in open debate without fear of censorship or institutional discipline for staff, students, and visiting speakers. In addition, this policy prohibits the use of non-disclosure agreements (NDAs) in any situation that would prevent staff from speaking out about misconduct, harassment, or other matters of public interest.

## **Equality, Diversity and Inclusion**

As with all Hartpury policies and procedures, due care has been taken to ensure that this policy is appropriate to all members of staff and students regardless of their age, disability, ethnicity, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation and transgender status.

The policy will be applied fairly and consistently whilst upholding Hartpury's commitment to providing equality to all. If any employee or student feels that this or any other policy does not meet this aim, please contact the HR Department (staff) or an academic tutor (student).

Hartpury is committed towards promoting positive mental health by working towards the MINDFUL EMPLOYER Charter, holds the Student Minds University Mental Health accreditation and has signed the AoC Mental Charter. Hartpury aims to create a culture of support within the workplace where employees can talk about mental health problems without the fear of stigma or discrimination.