

## 1. Data Controller

**University of Northumbria at Newcastle** (“we”, “our”, “us”) processes personal data in accordance with our obligations under the General Data Protection Regulations (‘GDPR’) and is a registered Data Controller with the Information Commissioner’s Office (‘ICO’), which is the supervisory authority responsible for the oversight and enforcement of Data Protection Legislation within the United Kingdom.

**Data Controller:** University of Northumbria at Newcastle  
**Registration Number:** Z7674926

## 2. Overview

We facilitate student placements and student and graduate recruitment to part-time, work experience and graduate roles. We coordinate employment engagement opportunities, which aid the development of student employability and help inform their career planning, job search and transition into the labour market.

This privacy notice is a statement that describes how and why we process (‘collects’, ‘uses’, ‘retains’, ‘discloses’, ‘disposes of’) personal data in relation to Student Placement Providers, Employers, and Graduates and Graduate Interns) using our services.

This notice also explains how you can control how we use your information in accordance with your rights under relevant data protection legislation.

## 3. Where does the University get your personal data from?

### For Service Users

#### 1. Graduates

Northumbria Graduates provide data to us directly at point of registration on our careers systems and through your transactional interactions with our systems and staff. Limited data may also be transferred from the University student records system to facilitate your registration.

#### 2. Employers

You provide data to us directly as part of your professional relationship with us, including via business cards, emails, telephone or web enquiries, event attendance or collaborative working, and data is further collected or updated as part of this ongoing relationship.

We may also obtain information from third parties such as one of your colleagues, from your organisation or from publically available information on your organisations website or professional profile.

#### 4. Categories of personal data are processed by the University

To carry out our activities and to manage our relationship with you, we may collect, store, and process the following categories of personal data:

<b>Data Category</b>	<b>Example</b>
<b>Biographical</b>	Name, title, birth date, age and gender, CV's, work or educational history, professional or personal interests.
<b>Contact Details</b>	Job title or role, relevant business or personal contact addresses, telephone numbers, email address etc.
<b>Professional Details</b>	Area of work, weekly hours, date of last mentor update, professional registration number, NMC part of the register, HCPC discipline, HCPC Social Work Number, Social Work qualification, practice educator qualification, DBS reference, etc.
<b>Administrative</b>	Enquiry and correspondence records, records relating to our professional relationship, event booking and attendance, University related interests, marketing preferences etc.
<b>Financial</b>	Banking or payroll information for administration of events or relevant internships.
<b>Special category ("Sensitive") Personal Data</b>	Information concerning your health or disability needed to ensure your accessibility and health & safety at careers events on campus. Nb only information which you have disclosed to us.

#### 5. Activities we process your personal data for and the lawful basis

Under Article 6 EU GDPR we must identify a basis for the "Lawfulness of processing" of our activities involving of your data. These are broadly described as: 'Consent', 'Contract', 'Legal Obligation', 'Vital Interests', 'Public Interest (or Public Task)' and 'legitimate interests'.

Data is processed for the following activities, which have been identified as necessary *"for us to comply with the law"*:

- For monitoring compliance with and enforcement of relevant policies in relation to health and safety and security (prevention and detection of crime) - including the use of CCTV, and safeguarding.

We may also process your personal data because it is necessary for our *"legitimate interests or the legitimate interests of a third party"*:

- For research and statistical analysis and to monitor and evaluate our performance and effectiveness
- To seek advice on our rights and obligations, such as where we require our own legal advice;
- In relation the “establishment, exercise or defence of legal claims” or whenever courts are acting in their judicial capacity”.

### **Photography**

Photographs may be taken at our events for use in communications and marketing materials, including on our website and on social media channels. Where you are not the subject of the image, i.e. if it is a “group” or “crowd” photograph, the University may use such images without requiring your consent, however, where you are the subject of the photograph, you will be asked to provide your explicit consent to use the image.

Notifications will be put up in and around these ‘open’ events to inform you when such photography is taking place.

You have the right to object or restrict your image being taken or used. If you would like to exercise this right, please contact us as set out below.

### **Communications**

The University will contact you in relation to events and services that we believe are relevant to you based upon their similar nature to your engagement with us. e.g. if you are a law graduate or law employer, we may send you information about a Law related event.

If, at any stage, you are concerned about the content (e.g. unwanted marketing), frequency (too many) or method (change preference) of these communications, you can unsubscribe or update your preferences using the link which will be provided at the bottom of the relevant correspondence.

Should you unsubscribe from our marketing messages you will miss regular communications about our services and updates.

Data is required for the following activities, which have been identified as necessary “*for the performance of our contract with you*” or in the case of potential partners, “*in order to take steps prior to entering into a contract*”.

### **For Service Users**

- Your registration with the Service and the administration of your service use, including your interaction with our systems and activities e.g. registration and invitation to events.

- To respond to your enquiries and to deal with any ongoing concerns or enquiries you have.
- To facilitate 1 to 1 support with professionals from the Careers and Employment Service and the Placement Team.
- To provide you with access to our events, facilities, services and activities.

### **For Employers**

- Registration on the Student Placements or Careers and Employment Service customer relationship management systems, and all associated administration of student placements and graduate recruitment, employability, 1 to 1 interactions and career development learning activities
- Administration of employer/student engagement activities on and off campus e.g. administration and registration at careers fairs and events or recruitment activities, and the subsequent collection of feedback on impact of participation.
- Administration of employer/student recruitments applications and facilitation.
- Promotion of your employment and other opportunities to students and staff of the University.
- Research and analysis relating to recruitment of Northumbria students and graduates for management reporting and strategic planning of employer engagement purposes.
- Processing and recovery of accounts and payments, e.g. sponsorship of events, and fairs.
- Building strategic, cross Northumbria University partnerships and relationships, making connections between parties and communities interested in advancing or investigating areas of mutual interest e.g. with the University Placements Team and key academics relevant to the services we provide.

### **6. Sharing your Personal Data with Third Parties**

Student and graduate information will be shared with employers when you initiate the sharing of your information by applying for, or enquiring about, advertised vacancies and opportunities.

Employer information will be made available to students and graduates to facilitate their applications.

Employers should note, where a multiple number of employers from the same organisation have registered, your colleagues may be able to see your name, job title, telephone number and email address.

## **The University**

On occasion the University may also be obliged to provide information to the police, local authorities or relevant government departments if it is deemed necessary under the appropriate exemption for the prevention or detection of crime.

Any other disclosures that may be required but not listed above will be in accordance with your rights and the requirements of the GDPR.

## **7. Transfers to third party countries**

Some of our IT services are hosted by organisations who may back up their data to locations based in third party countries. Where data is shared with third party countries, we ensure that these countries are either approved by the European Commission as having ‘adequate protection’ or we put in place ‘appropriate safeguards’ and contracts with these organisations, so as to maintain the security of the data and your rights under relevant Data Protection legislation.

There may also be limited sharing with organisations based in third countries for specific events, or where the nature of our relationship requires such sharing, for example as part of our global research partnerships .

## **8. How personal data is stored securely by Northumbria University**

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

All of our employees, contractors and volunteers with access to personal data receive mandatory data protection training and have a contractual responsibility to maintain confidentiality and access to your data is restricted to those members of staff who have a requirement to access it.

The University utilises many different storage solutions and IT systems, some of which are outsourced to third party providers. For example (but not limited to):

- University email accounts are provided by the Microsoft Live@Edu service.
- For the Careers and Employment Service we have engaged GTI Media TARGETconnect; and Abintegro as system hosts.
- Our Student Placements system is hosted by ARC Technologies Ltd.

Where processing takes place with an external third party, processing takes place under an appropriate agreement outlining their responsibilities to ensure that processing is compliant with the Data Protection legislation and verified to be secure.

## **9. Automated individual decision making, including profiling**

We may use “**Automated Decision Making**” (where systems make decisions about you ‘automatically’ without human intervention) or ‘**Profiling**’ (where information about you is used to tailor goods or services based on your interests, movement or records of your activities) to personalise the information you receive from us. For example ensuring that you are only contacted in relation to areas of interest to you.

## **10. How long personal data held by Northumbria University**

We will keep your personal information for as long as we have a professional relationship with you. For enquiries and event attendance this will be for 1 year following the completion of the transaction.

Where we have had an ongoing relationship, we will keep your data for up to 6 years after the end of the relationship for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than if required to do so for legal reasons, or for limited research or statistical purposes for which it will be anonymised. If we do, we will make sure that your privacy is protected and only use it for those purposes.

## **Your Rights under GDPR**

Under the GDPR, you have a number of rights in relation to the processing of your personal information, each of which may apply to differing degrees’ dependent upon the nature of the processing and the legal basis for it. You have the right to:

- Be informed as to how we use your data (via this privacy notice)
- Request access (a copy) of the personal information that we hold about you.
- Correct inaccurate or incomplete data
- Request that we stop sending you direct marketing communications.

All communication with you, including in relation to updates to this privacy notice, will be made via the preferred method of communication that you have registered with us, and you will be able to select the type of correspondence you receive.

If, at any stage, you are concerned about the content (e.g. unwanted marketing), frequency (too many) or method (change preference) of these communications, you can unsubscribe or update your preferences using the link which will be provided at the bottom of the relevant correspondence.

Please note that the option to unsubscribe may not be included in direct personal correspondence with individual members of staff, but you may request to them that you be removed from our systems.

In certain circumstances, you may also have the right to:

- Ask to have your data erased by us.
- Request that we restrict the processing of your personal data.
- Request that we provide any data you submitted to use electronically be returned to you or passed to a third party as a data file.
- Object to certain processing of your personal data by us

In some cases, there may be specific exemptions as to why we aren't able to comply with some of the above. Where this is the case, we will explain the reasons why.

For more information about any of the above please see the GDPR pages of our website.

In order to exercise any of the above rights, please contact the Data Protection Officer (*details below*).

## **11. Data Protection Officer**

The Data Protection Officer (DPO) for Northumbria University is Duncan James. Contact the DPO if you would like to:

- Receive a copy of your data.
- Have any questions you feel have not been covered by this Privacy Notice
- Have any concerns about the processing of your data
- Wish to make a complaint about the processing of your data

You can email at [dp.officer@northumbria.ac.uk](mailto:dp.officer@northumbria.ac.uk) or call +44 (0)191 243 7357

## **12. Lodging a Complaint with the Information Commissioners Office (ICO)**

If you are dissatisfied with our processing of your data, or a response to a complaint you have made to us about it, you have the right to complain to the ICO.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745

For more information see [Information Commissioner's web site](#).

### **13. Changes to this privacy notice**

We keep this privacy notice under regular review and will communicate any significant updates to you. This privacy notice was last updated in May 2018 and will be reviewed annually.