



Code: QAXXX
Title: Student Data Usage Policy
Date: 22nd July 2014
Approval: UMT

1.0 Purpose of Policy

From time to time the University is required to record, collate and process Personal Data relating to its students. This policy aims to communicate to both students and persons involved in the processing of such data the manner in which the University obtains such Personal Data, the purpose for which it is kept, controlled and processed and the manner in which students can access the data. The processing of Personal Data by the University must be undertaken in accordance with the statutory requirements of the Data Protection Acts, 1988 and 2003 (the “**Data Protection Acts**”) and this policy also sets out how such compliance is achieved.

2.0 Scope

This document outlines the policy of the National University of Ireland Galway (the “**University**”) concerning the Personal Data (as defined below) it collects and processes in relation to students. This policy applies to those engaged in processing Personal Data relating to students for administrative, research or any other purposes, including:-

- persons employed by or engaged by the University in such a role;
- contractors and agents engaged by and acting on behalf of the University in such a role ;
- students of the University (which in this context includes student applicants, existing students and former students).

3.0 Definitions

There are certain important specific terms which are given a particular meaning within the Data Protection Acts. For ease of reference some the key terms are referred to below:-

“**Data Subject**” means an individual, such as a student, who is the subject of Personal Data.

“**Personal Data**” means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller, in this case the University. Examples of Personal Data processed by the University are set out at Paragraph 4 below.

“**Sensitive Personal Data**” is a particular category of personal data to which further obligations arise. It relates to personal data concerning —

- (a) the racial/ethnic origin, the political opinions or religious/philosophical beliefs of the data subject,
- (b) whether the data subject is a member of a trade union,
- (c) the physical or mental health or condition or sexual life of the data subject,

- (d) the commission or alleged commission of any offence by the data subject, or
- (e) any proceedings for an offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings

“Data Controller” means a person who, either alone or with others, controls the contents and use of personal data. The University is a Data Controller.

“Data Processor” means a person who processes personal data on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of his employment.

“Processing” of or in relation to information or data, means performing any operation or set of operations on the information or data, whether or not by automatic means, including:

- (a) obtaining, recording or keeping the information or data,
- (b) collecting, organising, storing, altering or adapting the information or data,
- (c) retrieving, consulting or using the information or data,
- (d) disclosing the information or data by transmitting, disseminating or otherwise making it available, or
- (e) aligning, combining, blocking, erasing or destroying the information or data

4.0 Personal Data

Personal Data relating to students is collected and collated from a range of sources including (but not limited to) clearing houses, the Central Applications Office (CAO), the Postgraduate Applications Centre (PAC) and directly from students themselves as a part of the application/registration process. The type of Personal Data (including Sensitive Personal Data) processed by the University includes:

Student number	Student Course Code
PPS No	Assessment Results
Name	Degrees/Diplomas awarded
Date of birth	Details of Students attending examinations in sick bay*
Country of Birth	Curricula Vitae (Placement students only)
Nationality	Parents Socio Economic grouping *
Addresses (Home, Term, personal and work email)	Parents Occupation (Optional)*
Parent and/or Next of kin telephone, email contact details and addresses	Parents Employment Status (Optional)*
Image (for Identity card)	Religion (Optional)*
Details of previous results	Details of Disabilities (Optional)*
Schools attended	Medical Records*
Course application Details	Records of visits to Counselling Service*
Socio-Economic Category (optional)*	Garda Vetting forms *(for specific courses involving contact with minors)
Details of Funding	CCTV images
Fees (including the breakdown of any sums due, owing or paid at any particular time)	

*Sensitive Personal Data is collected/maintained by a limited number of offices and is not shared across the University. These details are disclosed either in line with the legal requirements on the University (e.g. Garda Vetting forms are sent to the Garda Vetting office to facilitate vetting of students) or upon the furnishing by the student of their written consent to a disclosure.

4.1 Purpose for Processing Personal Data

Personal Data (including some Sensitive Personal Data) is collected and processed by the University for a range of purposes, including the following:-

- To provide an accurate and efficient administrative system that underpins students' full interaction with the University throughout their relationship with the University (both academic and otherwise). The data is made accessible to relevant University staff to facilitate this interaction and it is electronically passed to a range of internal systems to facilitate access to resources and to provide for general University administration as it relates to individual students and the general student body.
- To allow for the collection and sharing of certain additional Personal Data internally within the University to meet the specific administrative needs and requirements of the various services/offices that a student may come into contact with during their association with the University, covering specific limited data across areas such as, for example, Medical Records, Student Counselling, College/School/Discipline offices and Fees Office.
- To facilitate the administration and payment of any fees and charges due, paid or outstanding to the University;
- To create and maintain the Alumni database so as to record details of graduates of the University, manage Seanad / Údarás na hOllscoile elections and to communicate with graduates with regard to University and Galway University Foundation activities.
- To create and maintain a proportionate CCTV security and monitoring system within the University for the specific purpose of the provision of security and in furtherance of the general health and safety of students.
- To collate statistical information regarding the University's student population and to allow the University to collate relevant student data and disclose certain data to the organisations and agencies referred to at paragraph 6 below.

4.2 Disclosure of Personal Data

Personal Data relating to students can be disclosed by the University to a range of external parties for associated purposes, including as follows:-

Organisation	Purpose
CAO	Ratings calculated at NUI Galway for Mature/non-standard applicants
PAC	Offers of places on postgraduate courses
HEA	Student CAO identifiers and RSI number (where available) as part of statutory annual returns. Socio-economic details, details of disabilities (as part of optional survey)
External Examiners	Exam scripts for external review
Students Union	To facilitate student elections
Employers	To facilitate placement of students
Dept. of Social Protection	Verifying individual employment status. Details of Registration to verify eligibility for Jobseekers allowances/Back To Education Allowance : (Student Name, Course, Date of Commencement, Date of final Exam, Course Type (Research/Taught), Fulltime/Part Time)
Grant authorities	Details of students' progression from year to year to confirm continuance of funding

External Funders, i.e. any financial sponsor offering support to the student to include any natural persons (e.g. Parents, Guardians, Next of Kin, Sponsors) or legal entities (companies, charities, authorities or other organisations)	Details of any fees and charges due by the student, a student's registration number, date of birth, address details and course details and such other details as may be required to allow for the timely processing of any payment to be made on the student's behalf and to allow for the issuance of a receipt.
NUI Senate and NUI Galway Údarás na hOllscoile election candidates	Graduate names and addresses for election purposes.
Galway University Foundation	Graduate details for the purpose of communication of Foundation activities.
Employers/Academic Institutions	Verified results relating to requests from students seeking employment.
Fulfilment (posting of letters)	Data released to printers for the purpose of facilitating mailshots on behalf of the University.
Companies	Copies of data released for fault resolution/testing purposes.
Software Suppliers	To provide services directly to students on behalf of the University (e.g. Student email, hosted elements of the Virtual learning environment).
Software Service Providers	Student name, Course reference, amount of tuition fees, Name of person who paid the fees, PPS number of person who paid the fees for the purpose of providing Tax Relief at Source
Revenue Commissioners	Details of students who have applied for courses which require Garda vetting.
Garda Vetting	Details of conferring ceremonies including names of students to be conferred and the degree/diploma
Public via website	

In addition, should the University be required to make contact with a student's Parent and /or Next of Kin (as referred to in Paragraph 7 below), that may necessitate the disclosure of limited and relevant Personal Data (excluding any Sensitive Personal Data) in order to establish the individual's identity and convey the subject matter of the communication.

5.0 Communication with Students

The University shall need to communicate with students from time to time in relation to administrative, academic and other matters. The University strives to use the most effective and efficient communication methods when communicating with students. The University provides all registered students with a '@nuigalway.ie' email address to facilitate email communications to/from students and staff. The University utilises a variety of methods/technologies to communicate with students based on any the following data:

- Student's NUI Galway Email address
- Student's Mobile Phone Number
- Student's Home Phone Number
- Student's Term address
- Student's Home/Other address
- Student's Personal Email address

Exceptionally, where urgent communication with a student through direct contact details is not possible or has, following repeated attempts, been unsuccessful, contact may be made via a student's parents

and/or next of kin or external funder as appropriate in the circumstances using the details furnished by the student. Relevant exceptional circumstances in this regard may include but not be limited to:-

- accidents/emergencies
- matters of security
- any urgent deadline driven administrative communications, which for the avoidance of doubt may also include communication concerning any due, paid or outstanding student registration fees or other charges or issues relating to same.

The University will communicate with applicants, students and graduates, using the methods mentioned above.

6.0 General Data Protection Compliance

The University is committed to complying with its obligations under the Data Protection Acts in the following manner:-

1. **Fair Obtaining of Data** –The University will collect students’ Personal Data in an open, transparent and up-front manner. At the time of the collection of such data the University aims to make students aware (through both this policy and any University forms and documents) of the uses for that information and the potential disclosures to third parties, including the obtaining of any consent for any secondary less obvious uses.
2. **Purpose Specification** – The University will be clear about the purpose for which it maintains any Personal Data and will communicate the position through this policy to its students.
3. **Use and Disclosure of Information** – The University will abide by this policy in relation to the use and disclosure of Personal Data. The University will make students and relevant staff and third parties aware of the existence and the details of this policy. The University will also only disclose Sensitive Personal Data with a student’s written consent.
4. **Security** – The University will ensure that appropriate security provisions are in place to keep both Personal Data and Sensitive Personal Data safe and those security provisions shall be periodically reviewed.
5. **Adequate, relevant and not excessive** – The University will seek to collect and process only the adequate level of Personal Data it requires for its specified purposes.
6. **Accurate and up-to date** – The University shall seek to ensure the accuracy of Personal Data collected and processed and, where relevant, take steps to ensure such databases are kept up-to-date.
7. **Retention Time** – The University shall only retain Personal Data for only as long as it is required for the purpose for which it was collected.
8. **Right of Access** – The University shall through this policy provide for an appropriate mechanism for students to either access or amend their Personal Data as held by the University.

7.0 Data Access Requests

Students, as data subjects, have a right to make a data access request of the University. Requests for access to (or requests for corrections to be made to) Personal Data should be directed to: **An Rúnaí, NUI, Galway, University Road, Galway**

8.0 Contact Details For Further Information

Any queries in relation to this policy should be directed to: **An Rúnaí, NUI, Galway, University Road, Galway**

9.0 Responsibilities

Name	Responsibility
UMT:	Approving Policy
Policy Owner:	An Rúnaí
Approval Committee:	UMT
Quality Office:	Maintenance of QA Codes and the Policy Repository.