

Table 1		
No.	Specific Purposes	Legal basis – Lawful Processing Article 6 GDPR
1.	<p>Open Days/Evenings, UCAS, Fairs, Schools, Colleges, (Pre-Contractual) enquiries. Management of enquiries with prospective students and communication of information about our services events and activities (taster/subject days)</p> <p>For current and/or Alumni students communication of information about our services, events and activities e.g. work experience/placement opportunities.</p>	<p>(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purpose</p> <p>Consent to receive such communications</p> <p>(1) (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interest is overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child</p> <p>The provision of support and advice on higher education services and opportunities.</p>
2.	Correspondence with offer holders regarding the next steps in the application and enrolment processes	(1)(b) Necessary for the purposes of entering into a contract for study with students
3.	Processing of applications for study and enrolment as a student which can include the processing of criminal convictions data and DBS checks depending upon the course chosen and for accommodation purposes.	<p>(1)(b) necessary for the purposes of entering into a contract for the study with students</p> <p>(1)(e) necessary for the performance of a task carried out in the public interest Schedule 1 conditions, 10 and 18 is applicable where criminal convictions data is processed with a view to preventing the student from harming or posing a risk of harm to others.</p>
4.	Admission, registration and administration of studies	(1)(b) Necessary for the purposes of entering into a contract for study with students
5.	Academic assessment and progression.	(1)(b) Necessary for the purposes of entering into a contract for study with students
6.	Administration of student related policies and procedures including appeals, complaints, grievances, disciplinary matters, and matters relating to health and conduct and to cheating and plagiarism	(1)(b) Necessary for the purposes of entering into a contract for study with students

7.	Provision of University Accommodation. Library Services and other support services including computer access and career and employability services. This processing may include processing personal data and sensitive personal data including, financial and banking information and health or disabilities relevant for your accommodation	(1)(b) necessary for the performance of the University contract with its students, and (1)(a) explicit consent to the extent that any sensitive personal data is obtained (1)(f) necessary for the legitimate interests pursued by the University when sharing student information with the career and employability support services.
8.	Processing and recovery of University fees, including course and accommodation fees	(1)(b) necessary for the performance of the University contract with its students
9.	Research and statistical analysis. Learning Analytics Data is used to track progress and success of applicants and students from first contact with the University, through admissions and to the completion of degree to help the University to understand how best to support students. Should the University be of the opinion that it needs to take intervention based on the tracking of the students' progress, explicit consent will be sought.	(1)(b) necessary for the performance of the University contract with its students (1)(f) Processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party, except where such interest is overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (1)(a) the legal basis will be that the data subject has given consent to the processing of his or her personal data for this purpose.
10.	Production of statistical returns required for third party government bodies e.g. the Higher Education Statistics Agency, for completion of government supported surveys e.g. Graduate Outcomes, the National Student Survey and the Teaching Excellence Framework	(1)(c) necessary for compliance with a legal obligation to which the controller is subject (1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education
11.	Creation of e-mail addresses, available to those within and outside of the University.	(1)(b) necessary for the performance of the University contract with its students. Email address necessary for University contact, updates etc.
12.	Monitoring student attendance at lectures/tasks/groups sessions, with the submission of assessments and engagement with course	(1)(b) necessary for the performance of the University contract with its students Ensuring that students achieve academic success through full engagement with their studies

	material available on Moodle. See student engagement policy	
13.	Evaluation of academic assessment and other course work	(1)(b) necessary for the performance of the University contract with its students
14.	Granting of academic awards (including the publication of awards, marks and inclusion in pass lists)	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education
15.	Monitoring of use of IT services in accordance with our Acceptable Use Policy	(1)(b) necessary for the performance of the University contract with its students
16.	Provision of immigration welfare services for international students, including applications for visa extensions	(1)(b) necessary for the performance of the University contract with its students
17.	To monitor our compliance with equalities legislation	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education
18.	To contact you regarding our Alumni society Registration as a member of University alumni upon graduation. Alumni activities are necessary for the purposes of legitimate interests of the University.	(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purpose Consent for our communications, marketing and recruitment department to contact you for this registration will be sought at the enrolment stage. (1) (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interest is overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child
19.	Administration for financial aid, such as hardship funding and loans	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education May include special category of sensitive personal data which will require explicit consent

20.	Administration of complaints, investigations and disciplinary proceedings concerning student misconduct, including investigations into misconduct	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education Investigating complaints concerning misconduct is necessary to maintain integrity of University assessment process, our academic standards, our reputation and the welfare of the students and staff
21.	Administration of academic appeals issued by students and other complaints brought against the University	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education Provision of an avenue to raise appeals regarding academic assessment and any other grievances
22.	Administration of the University CCTV system in accordance with the University CCTV policy	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education Safeguarding and facilitating prevention and detection of crime and assist in the investigation into potential breaches of University regulations and policies
23.	Administration and production of student identification cards including access to on-line shop	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education Safeguarding and facilitating prevention and detection of crime and assist in the investigation into potential breaches of University regulations and policies
Personal Data Released to Third Parties for the following Purposes		
24.	To UCAS to administer the applications and clearing process.	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education.
25.	To the Student Union:	

	<p>Sharing contact details for voting purposes</p> <p>Sharing course details to provide students with a voice and service delivery from the University and also allows the Student Union to advocate on your behalf.</p> <p>To provide access to services to students wishing to engage in a student union life to include but not limited to; to join union societies and sports clubs, buy entertainment tickets, vote in elections, access to reports and other student union related information</p>	<p>(1) (c) necessary for compliance with a legal obligation to which the controller is subject</p> <p>(1) (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interest is overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child</p> <p>Access to all other services are optional and thereby consent is relied upon for any processing necessary to deliver these services. The Student Union will obtain consent from you to deliver the services directly. https://www.wrexhamglyndwrsu.org.uk/main-menu/your-union/privacy-statement</p> <p>(1) (a) the data subject has given consent to the processing of his or her personal data for one or more specific purpose</p>
26.	To local authorities for the purpose of enrolment on the electoral register and automatically exempting student from payment of council taxes	(1)(b) Necessary for the purposes of entering into a contract for study with students
27.	To the police or other regulatory body where pursuant to the investigation or disclosure of a potential crime.	(1) (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interest is overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

28.	To close family and the emergency services where there is an emergency situation e.g. illness, serious injury; where you are unable to provide your consent.	(1) (d) Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
29.	To external examiners for the purposes of assessment	(1)(b) Necessary for the purposes of entering into a contract for study with students
30.	To governmental and regulatory bodies for the purpose of gathering census or other information including the assessment of fees, including electoral registration officers	(1)(c) necessary for compliance with a legal obligation to which the controller is subject
31.	To the Home Office and other international and national governmental and regulatory bodies in connection with the assessment of students status	(1)(b) Necessary for the purposes of entering into a contract for study with students (1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education
32.	To other educational institutions involved in the delivery of a student's course or programme, e.g. affiliated colleges, exchange institutions, including those outside of the UK and sometimes the EEA; and to other organisations in relation to any placements.	(1) (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interest is overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child
33.	To professional bodies where registration with that body is related to or a requirement of the student's studies	(1)(b) Necessary for the purposes of entering into a contract for study with students (1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education

34.	To professional bodies for occupational health or counselling	(1)(b) Necessary for the purposes of entering into a contract for study with students (1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education
35.	To banks (and other payment agencies you may use), family, sponsors or other third parties to enable them to pay student debts	(1)(b) Necessary for the purposes of entering into a contract for study with students
36.	To external agents of the University in relation to the repayment of student debts	(1)(b) Necessary for the purposes of entering into a contract for study with students Collection agency
37.	To external agencies - which may be based outside the European Economic Area - in connection with procedures for guarding against plagiarism.	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education
38.	To Data Processors in order for them to process data on behalf of the University for any of the purposes for which the University is permitted to process the data, including the provision of academic and other services by the University.	(1)(b) Necessary for the purposes of entering into a contract for study with students
39.	In relation to the provision of references for students or former students	(1) (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interest are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

40.	To external bodies and individuals who have funded student prizes, awards and courses.	(1)(b) Necessary for the purposes of entering into a contract for study with students (1) (a) To share contact details of former students, and/or former learners will need to obtain consent.
41.	To evaluate the Degree Apprenticeships with HEFCW (on behalf of the Welsh Government). Shared information will include but not limited to enable a review of implementation, assess impact and its effectiveness in achieving the programme's objectives and outcomes.	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education
42.	Where required, to organisations to manage and mitigate the spread and impact of the current outbreak of coronavirus (COVID-19) risks to public health (e.g. Track and Trace and Protect).	(1)(d) necessary in order to protect the vital interests of the data subject or of another natural person (1)(e) the processing is necessary for the performance of its official tasks carried out in the public interest in providing and managing a higher educational service.
All Students agree to the University processing their 'sensitive personal data'/'special category of data' for the following purposes and for release to the following third parties		
43.	To the Higher Education Statistics Agency, HEFCE, HEFCW, government departments and other authorised users for the analysis of student statistics, degree apprenticeships effectiveness (<i>in achieving the programme's objectives and outcomes</i>)and/or to enable them to carry out their statutory functions as applicable	Article 9(1)(a) processing "special categories" of data where you have given consent – the University will process certain sensitive information about you with your consent.

44.	To professional bodies where registration with that body is related to or a requirement of the student's studies	Article 9(1)(g) (Article 9(1)(g)), processing "special categories" of data where necessary for reasons of substantial public interest.
45.	To other bodies involved in the delivery of the course or programme e.g. affiliated colleges, for the purpose of statistical analysis and programme administration	Article 9(1)(a) processing "special categories" of data where you have given consent – the University will process certain sensitive information about you with your consent.
46.	For the assessment and provision of services to disabled students.	Article 9(1)(a) processing "special categories" of data where you have given consent – the University will process certain sensitive information about you with your consent.
47.	For admission to and the administration of student programmes.	Article 9(1)(a) processing "special categories" of data where you have given consent – the University will process certain sensitive information about you with your consent.
48.	Where required, to the police or other agencies in connection with particular programmes of study or prior to certain placements	Article 9(1)(a) processing "special categories" of data where you have given consent – the University will process certain sensitive information about you with your consent. or (Article 9(1)(g)), processing "special categories" of data where necessary for reasons of substantial public interest.
49.	To the University's external lawyers, insurers in respect of accidents occurring within the institution and external auditors	Article 9(1)(f) (Article 9(1)(f)), processing "special categories" of data in connection with legal claims.
50.	Where required, to organisations to manage and mitigate the spread and impact of the current outbreak of coronavirus (COVID-19) risks to public health (e.g. Track and Trace and Protect).	Article 9 (2 (c) processing "special categories" of data is necessary in order to protect the vital interests of the data subject or of another natural person – by sharing contact details of person (s) with symptoms of ill health (e.g. Covid-19 symptoms) which maybe the data subject or another natural person that they may have come into contact with on University premises and may have underlying health conditions. Article 9(2)(g) – substantial public interest and DPA 2018 Schedule 1 Part 2 para

		6 (Statutory and government Purposes) Article 9 (2) (i) public health purposes and DPA 2018 – Schedule 1 Part 1 para 3 Public Health.
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Table 2

CATEGORY	SHORT DESCRIPTION	MINIMUM PERIOD	MAXIMUM PERIOD
Recruitment Data	Expressions of interest in courses and open day information		Six months after cessation of relationship
Application Data	Applications forms, interview information		Six months after cessation of relationship (unsuccessful applicants) 6 years + 1 after student leaves (successful applicants) The Limitation Act 1980
DBS Disclosure	Information relating to criminal records		Six months after checking
Core Academic data	Transcript like information and basic verification information relating to the individual	perpetuity	perpetuity
	Information relating to student debt and student payments	Six years after the student leaves	Six years +1 after the student leaves The Limitation Act 1980

Financial data			
Reference data in addition to core academic data	Contents of student file e.g. attendance date, emails etc.	1 year after student leaves	Six years +1 after student leaves The Limitation Act 1980
Audit/professional/statutory data	Health and safety records, verification data required by professional body or HEFCW audit	As required	As required
Appeals and complaints/anticipated or ongoing legal action	Academic and disciplinary appeals, student complaints and litigation	1 year after student leaves for all students	Six years +1 after internal processes or after the student leaves The Limitation Act 1980
Course information	Programme and module specifications	Until replaced	Until replaced
Quality Assurance	Student surveys, module reviews, programme reviews, minutes of meetings, Exam papers etc	Current academic year +1	None unless individual is identified
Student assessments and evidence submitted for mitigation, disability notification	Assessments, exam scripts, and any item that identifies the student e.g. mitigating circumstances minutes, exam board minutes	1 year after student leaves	Six years +1 after student leaves
Learning resources that identify students		Current academic year +1	
Track and Trace and Protect	Name and contact details.	3 weeks.	3 weeks.

Drafted: May 2018	Author: Joy Morton	Review: May 2019
Reviewed: August 2019	Author: Leonna Messiter	<p>Changes made:</p> <p>Additions to Specific Purposes:</p> <p>1. 'For current and/or Alumni student's communication of information about our services, events and activities e.g. work experience/placement opportunities.</p> <p>3. '...and for accommodation purposes.'</p> <p>10. Learning Analytics Data is used to track progress and success of applicants and students from first contact with the University, through admissions and to the completion of degree to help the University to understand how best to support students.</p> <p>Should the University be of the opinion that it needs to take intervention based on the tracking of the students' progress, explicit consent will be sought.</p> <p>26. '...for voting purposes'</p> <p>'Sharing course details to provide students with a voice and service delivery from the University and also allows the Student Union to advocate on your behalf.'</p> <p>'To provide access to services to students wishing to engage in a student union life to include but not limited to; to join union societies and sports clubs, buy entertainment tickets, vote in elections, access to reports and other student union related information.</p>

		<p>29. ‘...where you are unable to provide your consent’</p> <p>41. ‘... and courses.’</p> <p>42. To evaluate the Degree Apprenticeships with HEFCW (on behalf of the Welsh Government). Shared information will include but not limited to enable a review of implementation, assess impact and its effectiveness in achieving the programme’s objectives and outcomes.</p>
Reviewed: August 2020	Author: Leonna Messiter	<p>Additions:</p> <p>42 & 50 – Both relating to the collection of personal data and when required, sharing of personal data to a third party (includes special category – relating to health) for Track, Trace and Protect purposes.</p>