

Careers Service Privacy Notice



The University of Winchester treats very seriously both the personal data and the sensitive personal data it processes on behalf of primarily its students and staff members, and also a wide range of other people who it works with and has contact with, including potential students and alumni.

The University has been and is continuing to work hard to comply fully with the new General Data Protection Regulation (GDPR) which is enforceable from 25 May 2018. The GDPR makes a number of key changes to data protection law in the United Kingdom and within the European Union (EU) and potentially beyond the EU. More information on these changes, which include strengthening of some individual rights and some new individual rights can be found on The Information Commissioners' Office (ICO) website at: <https://ico.org.uk/>

The ICO will enforce compliance with the GDPR from 25 May 2018.

The University processes both personal data and sensitive personal data under a range of different 'lawful bases' depending on the nature of the respective 'processing purposes'.

For the 'personal data' of students, alumni, staff and potential students, these 'lawful bases' include one or more of:

- 'Public task' (as the University is designated as a 'public authority' in law).
- Consent.
- Legitimate interests; and
- Legal obligation.

In addition for sensitive personal data, the University processes under one or more of the 'lawful bases' conditions listed in Article 9(2) of the GDPR.

The 'purposes of the processing' range from sharing general updates and news about the University and opportunities for involvement (such as for example attending courses such as Future Leader Experiences), to opportunities to attend career events, to processing applications for employability funding through the Winchester Employability Fund, to staff administration, to complying with legal obligations where the University is required to provide personal data under for example a subject access request (under The Data Protection Act 1998 - until 25 May 2018; and The General Data Protection Regulation - from 25 May 2018).

When communicating with key audiences such as current students, prospective students and alumni, 'Legitimate interests' is a lawful basis used by the University for specific processing purposes in line with ICO guidance.

Such 'Legitimate interests' for the processing include under the generally accepted three-part test for this 'lawful basis' as follows:

- 1. Purpose test: are you pursuing a legitimate interest?** - The University has a legitimate interest in processing via the respective 'processing purposes' here the opportunities for prospective and current students to study at The University of Winchester, which includes the gaining of educational qualifications. In a wider

sense, the University also has a legitimate interest in processing via the 'processing purposes' to achieve social bettering and transformation through education, and enable individuals to achieve their potential; and finally to increase applications and enrolments to the University of Winchester by communicating via direct marketing (email, SMS, postal, telephone) to current students and alumni considering studying again or taking up a graduate internship at the University of Winchester, and for the purpose of carrying out destination surveys.

2. *Necessity test: is the processing necessary for that purpose?* - It is necessary for the University to process data for the purpose of:
 - (a) increasing applications and enrolments to the University of Winchester's courses and internships by communicating via direct marketing (email, SMS, postal, telephone) to alumni considering studying again at the University of Winchester or taking up an internship, and there is no other realistic alternative which is as effective; and
 - (b) communicating with individuals, including alumni and ex staff. We believe that there is no other realistic alternative which is as effective for interests including fundraising and general updates on developments with the University, which either as alumni (former students) and/or as ex staff members they were previously associated with.
3. *Balancing test: do the individual's interests override the legitimate interest?"* - The University believes that students and alumni would reasonably expect the University to use their personal data in these ways, as summarised in the respective processing purposes. In addition, we do not believe that it would cause students or alumni unwarranted harm for the University to use their personal data in these ways, as summarised in the processing purposes.

Linked to its above mentioned 'processing purposes', the University processes a specific amount of personal data, which includes for example the names and contact details of current students and alumni. Such processing enables current students and alumni to keep themselves updated on Careers Service news and opportunities for involvement (for example when booking 1:1 appointments with a Faculty Employability Adviser) to opportunities to attend career and employability events such as Winchester Opportunities Week.

In certain specific circumstances and linked also to its above mentioned 'processing purposes' and where there is also an additional 'lawful basis' for this further processing, the University may process a specific amount of sensitive personal data. This is done in line with ICO guidance, and may include information about an individuals' health for example.

Sometimes the University has a requirement to share this information with groups of recipients. They include sharing details within the University, for example telling the Catering team about a student's dietary requirements when they are attending the Future Leader Experiences course.

Personal data and sensitive personal data will be kept for no longer than necessary, and these decisions will be made in line with legal requirements, the relevant University policies and in light of relevant best practices.

There are a number of individual rights available, and more information on these can be found at <https://ico.org.uk/>
If consent has been used as the lawful basis for a particular 'processing purpose', there is a right to withdraw consent (if applicable) by emailing careers@winchester.ac.uk

If 'Public task' has been used as the lawful basis for a particular 'processing purpose,' individuals have a right to object. More information on this 'right to object' can be found at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulationgdpr/individual-rights/right-to-object/>

If 'Legitimate interests' has been used as the lawful basis for a particular 'processing purpose,' individuals have a right to object. More information on this 'right to object' can be found at the web link (above).

If 'Legal obligation' has been used as the lawful basis for a particular 'processing purpose,' the individual has no right to erasure, right to data portability, or right to object.

There is a right to lodge a complaint with a supervisory authority. This is the ICO, who can be contacted in various ways as listed at: <https://ico.org.uk/global/contact-us/>

The majority of the personal data held by the University is obtained from the individual it relates to.

In some cases, individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to).

We review and update (where necessary) this policy statement in line with current guidance and developments.

The data protection officer for the University is:

Joe Dilger, Data Protection Officer,
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The name and contact details of our organisation are:

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