

Student Privacy Notice

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Who we are and how to get in touch

SOAS is the higher education institution in which you are enrolled as a student. SOAS is the Data Controller in respect of your personal data, which means we decide why and how we process information about you. We have appointed a Data Protection Officer whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection legislation. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data. For general queries please contact your academic department or the administrative team responsible for your enrolment records:

- IFCELS students: contact [IFCELS](#)
- Language Centre students: contact the [Language Centre](#)
- All other categories of students, whether online/distance or on campus: contact the [SOAS Registry](#).

Our current Data Protection Officer is David Ogden who can be contacted at dataprotection@soas.ac.uk or 0207 898 4817.

If the Data Protection Officer is unavailable, you can contact the Records Manager by email at dataprotection@soas.ac.uk, or by post at the address below:

Information Compliance Office, SOAS University of London, 10 Thornhaugh Street, Russell Square, London WC1A 0XG.

What is this document and why should you read it?

This notice explains how and why SOAS processes personal data about its current and former students. It covers all students, including those with taught or research status, part-time and full-time enrolments, those on pre-sessional courses and short courses (for instance in the International Foundation Centre for English Language Studies or the Language Centre), and distance learning students.

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices we give you that might apply to our use of your personal data in specific circumstances in the future (i.e. notices about how and why we process your data as an alumnus of the School).

This notice is not part of your contract as a student, or any other contract to perform services.

How is your personal data used?

When you enrol as a student, you enter into a contractual agreement with the School. To meet our side of this agreement, SOAS will need to process your personal data for specific purposes relating to your studies or other engagement with the School. Whilst the contractual basis for processing allows us to use your data for essential administrative purposes, such as supporting your enrolment, progression and award, we rely on other conditions, known as “lawful bases”, to process your data for other purposes. The School is required by law to always have a “lawful basis” for processing your personal data. This must (a) fit the purpose of processing, and (b) protect your rights and freedoms. More information on the conditions under which SOAS processes your personal data can be found here: ([Why do we process your personal data?](#)). Information on the additional conditions SOAS relies on for processing your Special Category Data (types of data which are more sensitive) can be found here: ([What is Special Category Data and how will we process it?](#))

SOAS processes your personal data for the following purposes:

- To administer your studies and record academic achievements (e.g. your course choices, examinations and assessments, and the publication of pass lists and graduation programmes).
- To administer student related policies including the policies and procedures relating to complaints, student discipline, academic appeals, academic misconduct, and fee status.
- Where relevant, to monitor, support and evaluate your research activity.
- To assist in pastoral and welfare needs (e.g. the counselling service and services to students with disabilities).
- To administer financial aspects of your registration as a student such as payment of fees, debt collection, scholarship and bursary funding, and other discretionary payments
- To manage School facilities, such as computing facilities and the Library.
- To produce management statistics and to conduct research into the effectiveness of our programmes of study.

- To produce student photographic identification cards and to keep a record of your photograph for future identification purposes
- To fulfil our legal obligations under equalities, immigration, and public safety legislation
- To monitor the attendance of students in accordance with the School [Attendance Policy](#), and where relevant for UKVI Tier 4 Visa compliance.
- To administer employment processes, if you choose to work for SOAS (for instance as a student ambassador, or a Graduate Teaching Assistant). Please see the [Staff Privacy Notice](#) for more information.
- To enable us to contact your nominated contacts in the event of an emergency (e.g. where you need emergency medical assistance)
- To operate and monitor security and health and safety measures such as CCTV and incident/accident reporting
- To record and capture certain lectures for teaching purposes. Please note that students are not the subject of these recordings, though students may be inadvertently included in some recordings. Further information is available at the webpage: <https://www.soas.ac.uk/lis/mps/lecturecapture/>
- For internal and external audits, and quality assurance exercises.
- To outwardly promote the School for marketing purposes
- To enable you to participate in events, such as graduation ceremonies
- To monitor the success of the School's Access and Participation Plan, which can be found online here: <https://www.soas.ac.uk/widening-participation/file135867.pdf>
- To communicate with you by email, post, or phone depending on the communication preferences you have expressed, including through regular circulars such as the student bulletin, to send you important information about your studies, administrative actions to take (e.g. enrolment periods), and any other information the School considers necessary to support your student experience. Where appropriate you will be given the right to opt-out of some of these communications.
- We may also contact you by social media channels and applications where you have joined an official University social network or initiated contact with us in this way

We may also disclose your data to certain outside organisations (see [Who do we share your personal data with, and why?](#)), for example where it is necessary to meet a legal obligation, or where we need to provide information to a body providing scholarship funding.

We may use copies of the data (including sensitive personal data) which we hold about you for the purpose of testing our IT systems. If your data is used for system testing, it will be copied to a test environment, where it will be used with data on other students to test changes to our IT systems in a realistic way. This is done to ensure that changes will be effective and will not cause loss or damage to data. The data about you which we hold in our live systems will not be affected. Your data will not be kept in the test environment for longer than is necessary for testing purposes, and data in that environment will not be used for purposes other than testing. We will also apply appropriate security precautions to the data.

What information does SOAS hold about you, and where do we get it from?

SOAS will collect data about you during our dealings with you as a current or former student (see [What do we do with your personal data, and why?](#)): for example, when you apply, when you enrol, and as you progress through your course. We may also receive data about you from outside SOAS, such as information from UCAS relating to undergraduates' UCAS applications, and information supplied by referees. If you are a current or former student, examples of the data which SOAS may hold about you include:

- Your name (including previous names such as maiden names, and known as or preferred names)
- Your student identification number
- Your contact details (email, telephone, home and term time addresses, and previous contact addresses you have provided us with)
- Details of your emergency contacts
- Marital status and dependants
- Your date of birth
- Your nationality
- Your visa details
- Your passport details (or other valid identification document as set out in the enrolment procedures)
- Records of your payment transactions
- Bank account details where these are needed for the collection of fees and other payments, or to disburse bursaries or any other payment issued by the School.
- Your academic background and qualifications, including opinion of your academic ability expressed in references
- Your academic record while at SOAS, including details of any degrees which you are awarded
- Any disabilities which you have disclosed to us
- Medical information, such as information held by the counselling service
- Fee information and funding or sponsorship details
- Household income, to assess eligibility for hardship funds or bursaries.
- Your use of SOAS facilities such as the Library
- Any disciplinary action taken against you
- Complaints you have made about services and/or teaching at SOAS
- Widening participation data, such as social protection history, parental history of higher education and family socio-economic group
- A digital photograph of you, which is used to produce your student ID, and for security and identification purposes
- Recorded CCTV footage
- Time-stamped records of access to the Library through the turnstiles using your student ID card
- Photographs used to identify you and those taken at School events. You will be informed separately where photographs are taken at events and consent will be sought before an image identifying you is re-used.

Data about you will be gathered and held in both digital and paper form. Some of this information (such as your ethnic origins, religious belief, medical information and information about disabilities) is classed as "Special Category" personal data under the General Data Protection Regulation (GDPR). This means that it is subject to extra legal protection, and we must meet an additional set of conditions in order use the data fairly and lawfully. For further information about what we do with your Special Category Data, see the section below ([What is Special Category Data and how will we process it?](#)).

If you are an undergraduate student, we will receive the following categories of information about you from third parties:

Through your UCAS application we receive:

- Contact details,

- personal information,
- educational background and assessment information,
- equalities information,
- health and disability information, and
- widening participation information.

From your nominated academic referees we receive:

- opinion on your academic ability and suitability for the course for which you applied

If you are a postgraduate student, we will receive opinion on your academic ability from your nominated academic referees.

Why do we process your personal data?

The School is required by law to have a lawful basis or valid condition for processing your personal data. Most commonly, we will process your personal data in the following circumstances where it is:

- necessary for the performance of our contract with you (e.g. to manage your student experience and welfare while you study at SOAS)
- necessary for compliance with a legal obligation (e.g. UK equal opportunities monitoring)
- necessary for a task performed in the public interest, or official authority vested in the Controller (e.g. teaching and research)
- necessary for the pursuit of the legitimate interests of the School or an external organisation (e.g. to enable your access to external services)

On rare occasions we may also need to process your personal data in the following circumstances:

- Where we need to protect your vital interests (or someone else's interests)

If we require your consent for any further use of your personal information, including use of your image and more sensitive personal information we will collect it at the appropriate time and explain this to you. You can withdraw your consent at any time. We will not use your personal information to carry out any wholly automated profiling or decision-making.

What is Special Category Data and how will we process it?

For some activities SOAS will need to process your Special Category Data and criminal convictions data, which are types of personal data the GDPR and Data Protection Act (2018) considers more sensitive than others. When we process these types of data, we need to apply additional protections. The GDPR Article 9 (1) states that the following types of data are Special Category:

- Ethnic or racial background
- Religious or philosophical belief
- Political opinions
- Sexual life
- Sexual orientation

- Health
- Trade Union membership
- Genetic data
- Biometric data, in so far as it permits identification of an individual

SOAS must rely on an additional condition in Article 9(2) of the GDPR to process these data types. For instance, we may ask for your explicit consent to process your Special Category data, in which case we will inform you exactly what information we need and why, and you will always be able to withdraw your consent at any time. By way of example, we rely on explicit consent to process your data when you engage with our counselling services.

If we process your criminal convictions data, for instance if you apply to work with our Widening Participation or Events teams whilst still a student and need a DBS check, we will process your data in accordance with Article 10 of the GDPR and Schedule 1 Part 1 paragraph 1 of the Data Protection Act (2018).

There are circumstances in which we will not ask your consent to process Special Category or criminal convictions data, such as:

- Where SOAS needs to process your personal data to protect your vital interests or the vital interests of another individual (e.g. providing a paramedic with information in the event of a medical emergency).
- For carrying out a legal obligation
- For the establishment, exercise and defence of legal claims

We will process your Special Category Data for the following purposes:

Data type	Purpose	GDPR or DPA(2018) condition
Ethnic/racial origin, religious/philosophical belief, sexual orientation	Equal opportunities monitoring including our statutory returns to the Higher Education Statistics Agency	Substantial public interest GDPR Article 9(2)(g)
Criminal convictions data	Certain work placements or work opportunities where a DBS check is required (e.g. in Widening Participation roles)	GDPR Article 10 DPA (2018) Schedule 1 Part 1 (1)
Data on your physical and mental health, including disabilities	To enable SOAS to provide support and access arrangements, including building access and Study Inclusion Plans, and to assess mitigating circumstances applications	Preventive and occupational medicine GDPR Article 9(2)(h)
Sensitive information provided to the School in confidence, for instance in counselling sessions or as part of the student complaints procedure	We process this information to provide you with appropriate and specialist support, or to enable us to fully investigate your complaint or appeal	Explicit consent GDPR Article 9(2)(a)

Who do we share your personal data with, and why?

Sometimes we need to disclose your data to other people or organisations. Together they are called 'third parties' below.

Some third parties assist SOAS in carrying out certain business functions, for instance by providing the student records database. These third parties will process your personal data on our behalf (as our processor) and under our instructions. We will disclose your personal data to these parties so that they can carry out the functions they have been contracted to perform. Before we disclose your personal data to other people or bodies, we will make sure that they have appropriate technological and organisational security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

In certain circumstances, we will also disclose or share your personal data with third parties who will receive it as controllers of your personal data. This means that they decide how to process your data, and for which purposes. Some of this information sharing occurs routinely whilst some is occasional.

The list below covers all the third parties who receive your data. The list has been separated into two sections. First, third parties who receive your data as a processor, and second, third parties who receive your data as a controller.

Processors

- **Capita:** Provide our student records database. This system holds information provided to SOAS in your application, and further information you provide during enrolment. Details of your module choices and assessments, and other changes to your student status such as disability status or whether you owe a debt to the university, are also held on this system.
- **Unit4:** Provide our financial accounting system. This system holds records of any payments you make to SOAS, and any payments we make to you.
- **Google:** Provide SOAS's cloud based email service, including student email accounts.
- **Scientia:** Provide SOAS's timetabling system used to generate students' personal academic timetables.
- **Bloomsbury Learning Environment:** Provide the infrastructure and platform for the School's Virtual Learning Environment, enabling students to access course materials, upload work for assessment, and download marked work.
- **External examiners:** Provide a marking service on behalf of the School. They would see information from which you can be identified only in the case of non-anonymous assessment, such as dissertations, and Postgraduate Research examinations.

Controllers

- UK Higher Education Statistics Agency (see HESA's statement about the uses made by them of your personal information published at <https://www.hesa.ac.uk/about/regulation/data-protection/notices>). HESA will mainly use this data to produce anonymised statistics. Around six months after graduating, SOAS students will also be contacted by the Careers Service about the Graduate Outcomes survey, which is also organised by HESA. This survey is designed to gather data about your career or other activities at that time, and the relevance

of the course which you undertook. If there is no reply, somebody from the Careers Service will telephone the number which you gave the School in the hope of speaking to you. As a last resort, they are authorised to accept information from a third party such as a near relative. Any data which is collected, but not your contact details, will be passed to HESA and will be linked to the record which HESA already holds about you.

- SOAS will send data relating to you to sponsors and funding bodies where we are required to do so by law or where you have consented to the transfer of data, e.g. in the contract between you and the funding organisation. For example, we have a statutory duty to disclose data to the Student Loans Company, and to local education authorities for students eligible for fee and loan payments. Where students are in receipt of a US Federal loan, SOAS may be required to release personal data pertinent to the loan to relevant parties as required by the US Department of Education. Students receiving such loans must sign a statement (on the Master Promissory Note) consenting to the release of such information. In other cases, SOAS will not release data about you to bodies or individuals who have funded your education (such as your parents or employer), unless you tell us that we can do so.
- Relevant UK Government Departments, such as Department for Education, Home Office (including UK Visas and Immigration), Foreign and Commonwealth Office, and other public bodies (e.g. HM Revenue and Customs, the Health and Safety Executive, Information Commissioner's Office) for the assessment of student status for immigration and visa purposes; for the purposes of gathering census or other information including the assessment of fees; and for the purposes of monitoring SOAS's compliance with relevant legislation.
- Relevant Higher Education bodies, such as the Office for Students, UK Research and Innovation, Universities and Colleges Admissions Service, Office of the Independent Adjudicator, organisations running the National Student Survey(s) and other student surveys.
- Any other relevant professional or statutory regulatory bodies
- We disclose the names and addresses of relevant students studying at SOAS to Local Authorities to assist with the administration of students' exemption from Council Tax
- On occasion and where necessary, we disclose students' personal data to the police and other law enforcement agencies
- Where necessary the emergency services and your designated emergency contact where there is an urgent requirement to share information e.g. illness, serious injury, bereavement or the suspicion/risk of this
- On occasion and where it is necessary, students' personal data will be disclosed to our auditors e.g. annual financial audits
- To any third party wishing to access a catalogue within the University's library containing reference to student work e.g. PhD theses
- To Transport for London, with whom we verify applications for Student Oyster Cards through the TfL portal.
- To banks (and other payment agencies you may use), family members who are paying your fees, sponsors or other third parties to enable them to pay student debts and this includes the disclosure of relevant information to our supplier of banking services for the purposes of complying with anti-money laundering regulations
- To external debt collection agencies acting on behalf of the School for the purpose of recovering money owed.

- The Metropolitan Police, only for relevant overseas students from certain countries where there is a requirement to register under the terms of a Tier 4 visa. In these cases only your name, date of birth and nationality and if applicable the details of any dependants are shared prior to your registration appointment with the Police. Further information is available on page 4 of this document: <https://www.soas.ac.uk/registry/file93494.pdf>
- Details of successful degree candidates are included in programmes and other information connected with graduation ceremonies. If you do not want your information to be made available in this way, please contact the SOAS Registry at studenthub@soas.ac.uk.
- We will provide information to prospective employers or educational institutions in the form of academic references and confirmation of qualifications with your consent.
- We provide information to third party accommodation providers, including Sanctuary Housing and the University of London, to support the applications and requirements of students eligible for housing.
- If your programme of study involves spending time at an institution outside SOAS, including intercollegiate modules, or you have come to SOAS as a visiting, exchange or junior year abroad student, we may need to share information about you with the other institutions involved in that period of study (within or outside the European Economic Area). This will be done for the administration of the visit, exchange or study abroad, and so that the other institution can carry out its duties in regard to your studies. If you are involved in a visit, exchange or study abroad, SOAS will transfer data about you as necessary for purposes connected with your studies.
- We will share your data with the SOAS Student Union to facilitate your membership of the Union and associated clubs and societies. You have the right to opt-out of membership of the Students' Union at any time. Please see the Data Sharing Agreement between SOAS and the SOAS Student Union here: [insert link to uploaded doc – new version on CMS now].

Do we transfer your personal data outside the EEA?

SOAS transfers your personal data outside the EEA for the following purposes:

Communicating with you and providing information about your studies

SOAS uses Gmail as its email management system. Gmail is a cloud-based service provided by Google. The data is stored by Google in the server closest to the individual's location. This means if a student travels outside the EEA for over a fortnight and accesses their student email account, their data will be transferred to the nearest server. If the server is outside the EEA, this will be an international transfer. SOAS has entered into a Data Processing Agreement with Google to ensure that all personal data and Special Category Data is secure, and that individuals can exercise their rights under the law and have access to effective legal remedies. With regards US data transfers, Google is signed up to Privacy Shield, the EU-US framework for transferring personal data between the US and EEA territories.

Administering students on the Erasmus+ scheme, or other arrangements for studying abroad

Some students may apply for the Erasmus+ scheme, or have the option of studying at a university outside the EEA as part of their programme. SOAS will ensure that it meets a valid condition for the transfer of your data under Article 46 of the GDPR, and we will only transfer such data as is necessary to achieve the specific purposes of your study abroad or student exchange programme.

Managing scholarships, bursaries and awards provided by funding bodies outside the EEA

If you are the recipient of a scholarship, bursary, or academic award or prize which is designed to support you financially in your studies, SOAS may from time to time need to share information about your progress with the funding body. If these funding bodies are outside the EEA, SOAS will ensure that it meets a valid condition for the transfer of your data under Article 46 of the GDPR, and we will only transfer such data as is necessary under the terms of your funding.

How is my personal data used after I graduate?

After you graduate a permanent record of you and your studies is retained indefinitely so that the details of your academic achievements can be confirmed and for statistical or historical research. Examples of specific uses of your personal data after you graduate are listed below:

- Your name and contact details are passed to our Directorate of External Engagement, Policy and Alumni (DEEPA) prior to your graduation to allow the School to stay in contact with you after you graduate. A privacy notice for our alumni and supporters setting out how their personal information is used by the School is published here: <https://www.soas.ac.uk/infocomp/dpa/daee-privacy-statement/>. You will receive more details at the appropriate time and have the opportunity to opt-out of being contacted by DEEPA.
- Your contact details will also be passed to HESA and/or an organisation contracted to undertake the Graduate Outcomes survey on their behalf (further information is available from <https://www.hesa.ac.uk/about/regulation/data-protection/notices>). The survey contractor will only use your contact details for the survey and will delete them when the survey is closed. HESA may hold your contact details for further graduate outcomes surveys where these are in the public interest. Your responses to the survey of graduate outcomes will be made available to the School. These surveys are used to create statistics to meet the public interest in the outcomes of higher education.
- You may be contacted to take part in other surveys, such as surveys into the graduate outcomes of international students, which are led by SOAS and are used to create statistics which SOAS will use to monitor and assess the effectiveness of its academic programmes and support for the student experience. If we use a third party to run the survey, they will only retain your contact details for the period in which the survey is open, and will afterwards destroy them. These surveys are voluntary, and you may choose whether or not to participate.

When you are contacted for any of these surveys we will provide you with a data collection notice explaining why we are conducting the survey, how long we will retain your data, and how your data will be kept secure.

How long will we keep your personal data?

As a student at SOAS we will keep your data for the duration of your studies and then, after you graduate, for long as necessary to protect your legal rights, to allow us to contact you as an alumnus, to provide evidence of your studies and graduation, and for historical research or statistical purposes. This means we keep some types of personal data longer than others.

How long we keep your data depends on the following factors, which include but are not limited to:

- a) Any laws or regulations we must follow
- b) If we are engaged in a legal or other dispute with you, or with a third party
- c) The type of information we hold about you
- d) Whether we have been asked by you or a regulatory authority to keep your data for a valid reason

SOAS will keep records containing your personal information for varying periods of time, and depending on the factors listed above. For more specific information on the retention of student data, please see the SOAS retention schedule here: [SOAS Retention Schedule](#)

What are my rights?

You have certain legal rights in relation to your personal data. If you exercise your rights by asking for access to your data, for data to be corrected, or if you object to our processing or want to restrict processing, we have one month to respond to your request by satisfying the terms of the request, or explaining why we are unable to do so (e.g. because an exemption applies, or we feel that our legitimate interest in processing outweighs your objection). Some legal rights may not be available depending on the lawful basis under which we are processing your data, as shown in the table below.

As a registered student, we may process your personal data under the following lawful bases:

- a) Consent
- b) Contract
- c) Legal obligation
- d) Public interest or a public task performed under official authority vested in SOAS
- e) Vital interests
- f) Legitimate interests

The table below shows which rights are available to you under each lawful basis:

Lawful basis	Individual's rights					
	Access	Correction	Restriction	Erasure	Data Portability	Objection
Consent	Y	Y	Y	Y (right to withdraw consent)	Y	Y (right to withdraw consent)

Contract	Y	Y	Y	Y	Y	N
Legal obligation	Y	Y	N	N	N	N
Vital interest	Y	Y	N	Y	N	N
Legitimate interest	Y	Y	Y	Y	N	Y

Right of Access: You have the right to the information which the School holds about you. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, the School may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. A guide on how to make a 'Subject Access Request', including requirements for proving your identity, is available on our website here: [Making a request for your data](#)

Right to correct your data: If you believe data we hold about you is incorrect as to a matter of fact, or if your information changes, please write to the following areas of SOAS:

- IFCELS students: contact [IFCELS](#)
- Language Centre students: contact the [Language Centre](#)
- All other categories of students, whether online/distance or on campus: contact the [SOAS Registry](#).

It is your responsibility to keep your information up-to-date, and to notify us of any changes to the information we hold about you. This may involve amending, adding to or removing information we hold on you.

Right to restrict processing: If you believe SOAS is processing your data unlawfully, you can ask us to restrict the processing of your data whilst we investigate your complaint. When we restrict your data we will not do anything with it other than store it securely, in order to mark it as restricted.

Right to erasure: If we process data with your consent then you can ask for your data to be expunged (completely deleted) at any time. You can also ask us to delete your data when we no longer need it to show evidence of our contractual relationship.

Right to data portability: If you provide us with electronic data which we have your consent or a contractual reason to process, you can ask for a copy of the data in a machine-readable format, or you can ask us to transfer it to another IT environment on your behalf.

Right to objection: If we process your data with your consent or in our legitimate interests, you may object to the processing. For example, you might opt-out of receiving alumni newsletters.

If SOAS corrects, restricts, or deletes your personal data at your request and that data has been passed to a third party or third parties for the same purpose, SOAS is responsible for ensuring that those bodies also fulfil the terms of your request unless it proves impossible or requires disproportionate effort.

If you wish to exercise any of these rights, please contact our Data Protection Officer (contact details in the first section of the Notice here: [Who we are and how to get in touch](#)) in the first instance.

Updates to this notice

We will review this notice on an annual basis, and will make updates as necessary to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on changes to this notice by posting a message in the student bulletin, or through other appropriate channels of communication.

Who regulates the use of personal data?

If you think SOAS is processing your data unlawfully, you have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>