

Richmond the American International University in London: Student Privacy Policy

This policy sets out the basis on which Richmond the American International University in London Inc ("we / us" or "Richmond") processes and shares students' personal data. Please read this policy carefully (in particular in relation to Richmond's use of Sensitive Personal Data and contact us if you have any comments, concerns or queries.

We comply with the provisions of the UK Data Protection Act 1998 ("DPA") and US Family Educational Rights and Privacy Act ("FERPA").

For the purpose of the DPA, the data controller is Richmond the American International University in London Inc, of Queens Road, Richmond, Surrey TW10 6JP. Richmond is registered on the UK Data Protection Register with number Z4646388.

1. Collection of your information

a) Prospective and Current Students

If you apply to register as a student with us, we may collect the following information about you at various stages throughout the application and enrolment process, and during the time you are a registered student with us, which we will use and retain for the purposes set out in this policy:

<ul style="list-style-type: none">• Name and address	<ul style="list-style-type: none">• Social security or national insurance number
<ul style="list-style-type: none">• Telephone numbers	<ul style="list-style-type: none">• Photographs and videos (including those taken for your ID card and at events, for example, the Honours Night)
<ul style="list-style-type: none">• Email addresses	<ul style="list-style-type: none">• Personal statement and predictive grades
<ul style="list-style-type: none">• Next of kin name and contact details	<ul style="list-style-type: none">• Education records (including the names and contact details of other institutions you have attended)
<ul style="list-style-type: none">• Date of birth	<ul style="list-style-type: none">• Qualifications and examination results
<ul style="list-style-type: none">• Gender	<ul style="list-style-type: none">• Years of study

<ul style="list-style-type: none"> • Nationality and country of residence 	<ul style="list-style-type: none"> • Degree / major/programme of study/course details
<ul style="list-style-type: none"> • Racial or ethnic origin* 	<ul style="list-style-type: none"> • Details of progress on degree / major/programme of study
<ul style="list-style-type: none"> • Disabilities and associated medical conditions and/or learning support needs, including receipt of Disabled Student's Allowance* 	<ul style="list-style-type: none"> • Academic references and progress reports
<ul style="list-style-type: none"> • Correspondence you have with Richmond 	<ul style="list-style-type: none"> • Bank details
<ul style="list-style-type: none"> • Criminal convictions either before or during the time you are registered as a student at Richmond* 	<ul style="list-style-type: none"> • Funding and fee related information, including eligibility for student support
<ul style="list-style-type: none"> • Commission or alleged commission by you of any offence during the time you are registered as a student at Richmond* 	<ul style="list-style-type: none"> • How you heard about Richmond as a place to study
<ul style="list-style-type: none"> • Information relating to your extra-curricular activities 	<ul style="list-style-type: none"> • Complaints that you make, or relating to complaints that others make that involve you

*This information is "sensitive" personal data, as defined in the DPA. Please see the section on [Sensitive Personal Data](#) below for information on how we treat this data.

b) International students

If you are an international student (not a national of an EU or EEA member state or Switzerland), or if we are not sure of your citizenship, or if we are required to by the Home Office or any regulatory authority, we may ask you for your:

- Passport details
- Visa details
- Evidence of your course attendance

c) Leaving Richmond, alumni & former students

When you leave Richmond we may ask you for the following information. You can choose whether or not to provide this information:

- Where you are or will be working or studying
- Your new address and contact details
- Your experiences, future plans, decisions and achievements

About 6 months after you have left Richmond we will also contact you to ask you to participate in the Higher Education Statistics Agency ("HESA") 'Destinations of Leavers from HE' survey.

We also collect information about you that we hear from publically available sources (for example, news reports about our alumni).

We may also keep a record of any correspondence between yourself and Richmond, as well as details of any donations you have given us.

We will retain the information that we collected from you as a prospective and current student for the purposes set out in this policy.

To enable us to comply with the DPA and keep accurate information about you, you agree to only provide us with accurate and up to date information and to notify us of any changes to your contact details and circumstances including, but not limited to, any changes to your programme of study or if you intend to leave Richmond.

Richmond respects the principle under the DPA that personal data should not be kept longer than is necessary for the purpose for which it is kept. We take measures to ensure that your personal data is destroyed or erased from our systems when it is no longer required.

2. Our use of your information

We may use the information we hold about you for some or all of the following purposes:

- corresponding with you in connection with student and graduate matters during your enquiry, application and enrolment, whilst you are a student at Richmond and after you have left
- making admission decisions
- confirming your attendance at previous institutions and the you qualifications obtained
- managing the provision of housing and catering services
- managing financial matters including loans, payments, sponsorship, charges and fines
- identifying you as a student and providing you with education services, career and internship services and graduation services (including the graduation ceremony)
- monitoring your academic progress
- recording your attendance, examination results and qualifications

- providing student support services, including IT services, financial support and learning resources (e.g. library services)
- dealing with appeals, complaints and disciplinary matters
- complying with Home Office checks for international students
- monitoring and promoting equality of opportunity within Richmond
- provision of data to the Higher Education Statistical Agency ("HESA")
- providing you with information for administration, health, safety, welfare and security reasons
- keeping in touch with our alumni for the purposes of delivering exclusive alumni services, fundraising and promoting closer links between Richmond and its former students
- carrying out our legitimate functions as an educational establishment

Some students also work for Richmond. Information about how Richmond manages data about you in these cases is detailed in Richmond's Employment Handbook and in individual contracts of employment.

3. Our disclosure of your information to third parties

We may share information about you with the following parties:

- third parties for the purposes of confirming the accuracy of the information you provide (e.g. your previous educational institutions to confirm your attendance and qualifications obtained)
- operators of application and admission systems (e.g. UCAS and Common Application)*
- Richmond's employees, agents or contractors who need your information for administrative, teaching or assessment purposes. This includes employees in the United Kingdom, Europe and the United States of America
- Richmond's Student Government for the purposes of contacting you regarding the services it offers (e.g. support, membership of student societies, to buy tickets for events, vote in elections and for other Student Government matters)
- professional bodies who accredit, validate or assure the quality of what we do (including The Open University, Middle States Commission on Higher Education and the UK Quality Assurance Agency)
- collaborating organisations who provide teaching, assessment or student services in partnership with Richmond (including Richmond International Academic and Soccer Academy ("RIASA"), the American Institute for Foreign Study ("AIFS"), Higher Education institutions sending students to or receiving students from Richmond under student transfer, visiting or exchange arrangements and internship providers)*
- the UK Home Office, if you are an international student, in relation to your enrolment, engagement with your studies and your visa status*
- referral partners (i.e. international recruitment consultants and agents) if requested to confirm that a student referred to us by them has enrolled at Richmond*

- organisations who provide services to us, for example IT or catering services, research or survey services, or organisations who undertake mailings on our behalf
- your financial support provider (if any) regarding grants, fees, student loans and sponsorship, your attendance, part time / full time status and if you have withdrawn from a course. Such providers may include Student Finance England, Free Application for Federal Student Aid ("FAFSA"), the US Department of Veterans Affairs ("VA"), the US Department of Education and Sallie Mae (as applicable). We may also provide them with your current contact details if requested to locate you to pursue an unpaid debt*
- the US Department of Veterans Affairs ("VA") with your academic records (including but not limited to details of your degree / course, enrolment status, number of credits, examination results) on an annual basis as part of their audit on Richmond, but this will only apply to students seeking support from VA*
- the Higher Education Statistics Agency ("HESA"). Each year, the university is required to submit data about its students to the Higher Education Statistics Agency (HESA). HESA is the official body responsible for collecting and disseminating information about higher education in the UK. Data will be sent to HESA including your name, date of birth, your studies and qualifications. This information will be used by HESA in compliance with the Data Protection Act 1998 and from 25th May 2018, with the General Data Protection Regulation (GDPR). More information about the student data collection return can be found here: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>
The university will request the consent of new students on admission, and for returning students, in September 2017. Please see also HESA's data protection guidance related to the Graduate Outcomes survey published here: <https://www.hesa.ac.uk/innovation/outcomes/providers/data-protection>
- the market research company (currently Ipsos MORI) appointed to carry out the National Student Survey and other survey contractors appointed to carry out surveys of student finances. For more information about use of your information for the National Student Survey please see <http://www.thestudentsurvey.com/students.php> You have the right not to participate in the survey.
- the organisation we use to conduct the Destination of Leavers from Higher Education Survey on our behalf. The information we share with this organisation may include sensitive information (for more information on this please see the section below on Sensitive Personal Data). The outcome of the survey for each student will be passed by us to "HESA". You have the right not to participate in the survey.
- your next of kin should you be hospitalised or taken ill whilst a student, excluded from your Richmond programme or accommodation, or fail to attend Richmond to a degree which may cause significant concern.
- third parties if it is necessary to protect the vital interests of you or others (i.e. where you or another person is perceived to be at significant risk)
- third parties if we are legally required to do so (for example if you commit a criminal offence or are a witness to any commission of an offence). We may need to provide information to the Home Office, the police and the US Department of Education and in some circumstances we may be required to disclose information relating to you in response to third party requests made to us under the DPA)
- local authorities for the purpose of assessing and collecting council tax

- Richmond's insurers, legal and professional advisers

(* in these cases only where you have elected to make use of the specific services or provision concerned or if that specific service or provision is relevant to you.)

Richmond takes steps in compliance with the DPA to ensure that third parties who process personal data on its behalf (for example in the context of providing services to Richmond) process personal data in accordance with the DPA.

We will not disclose your personal data to any third parties for any purpose other than those described above unless we either have your consent or have a legal basis to do so without your consent. In particular we will ask for your consent before we transfer your information to:

- potential employers or institutions in connection with your applications for employment or further education
- other universities in the event that you transfer from Richmond
- your next of kin other than in the circumstances detailed above
- public directories or lists (including our website www.richmond.ac.uk)

4. Sensitive Personal Data

Some of your personal data processed by us may be classified as "sensitive" under the DPA. This includes your racial or ethnic origin, any disabilities and any associated medical conditions that you have chosen to declare to us. It also includes any criminal convictions you may hold either before or during the time you are registered as a student at Richmond, and the commission or alleged commission by you of any offences during the time you are registered as a student at Richmond.

We may also collect sensitive information from you in relation to any applications you submit for extenuating circumstances, complaints, disciplinary cases and optional student services provided by Richmond. Sensitive personal information about you may also be provided to us in some circumstances by others (for example, other students or members of staff who may be concerned about you).

If you disclose sensitive personal information to us, we will only use that information for the purpose(s) given to you at the time the information was collected. We will collect and use your sensitive personal information either with your consent (this will be made clear when it is collected, through a specific request for consent) or without your consent where there is a legal basis to do so (such as for equal opportunities monitoring).

We will:

- use information you provide to us relating to a medical condition, disability or learning support need you may have for the purposes of evaluating what suitable support may be available to you and to share this information with Richmond employees and third parties who are directly involved in the application process or the provision of student services, for example RIASA and AIFS. Please note that this information has no bearing on the academic assessment of your application

- use information relating to any criminal conviction you may have for the purposes of evaluating your admission to Richmond or for evaluating whether to allow you to continue to study at Richmond and to share this information with Richmond employees and third parties for such purposes
- only share your sensitive personal data with other third parties without your consent if we have a legal basis to do so. This includes the provision of sensitive personal data, including your ethnicity and any disabilities you have declared, to HESA (as specified above): consent is not required for this under the DPA because it is collected for purposes of research and equal opportunities monitoring and is not used to make decisions about you.

Other disclosures of sensitive personal data without your consent will be rare and include circumstances where it is vital to protect the interests of you or others (i.e. where you or another person is perceived to be at significant risk), it is necessary for the prevention of fraud or if we are under a legal obligation.

5. International data transfers

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

Richmond does not operate as a university in the United States of America, but your information may be sent to its offices in Boston. We may also transfer your information to third parties detailed above who operate outside the EEA (e.g. to Federal and private student finance providers in the United States of America). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

6. Access to your information

The DPA gives you the right to access information held about you. Your right of access can be exercised in accordance with the DPA. Any access request will be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

7. Changes to this privacy policy

Any changes we may make to this privacy policy in the future will be posted on our websites www.richmond.ac.uk and <https://my.richmond.ac.uk> and material changes will be notified to our prospective and current students and to those on our alumni database by e-mail, using the e-mail addresses we have on record. Please check back frequently to see any updates or changes to our privacy policy.

8. Status of this policy

For some of the uses of your information described above there is a basis under the DPA for us to use the information without your consent. (This includes the provision of information, possibly including some sensitive personal data, to HESA). Where this is the case, this notice fulfils our duty to process information fairly, which includes giving you appropriate notice and explanation of the way in which your information will be used.

Where your consent is required to the use of your information, by submitting your information to Richmond, you agree that it will be processed in accordance with the terms set out in this privacy policy.

In particular, where your consent is required, you agree that the information we collect from you may be transferred to, and stored at, a destination outside the EEA including the United States of America and to the use of your Sensitive Personal Data as described above.

As explained elsewhere in the policy, you can request access to any personal information held by us and ask for more information about the basis on which we collect and use that information by writing to our Data Protection Officer (see contact details below).

If you have left Richmond and you do not want us to keep in touch with you regarding our alumni services or to give you the opportunity to support Richmond, you can opt out of receiving any future communications by contacting us at alumni@richmond.ac.uk or by post to Richmond The American International University in London, Development and Alumni Relations, Queen's Road, Richmond upon Thames, TW10 6JP, UK.

9. Updating your Information / Contacting us

If you have any questions, concerns, comments or requests regarding this privacy policy, or would like to update any details or information we hold about you, or wish to access the information we hold about you, please contact us the Data Protection Officer at registryservices@richmond.ac.uk, or write to us c/o Registry Services, Richmond, The American International University in London, Queens Road, Richmond, TW10 6JP, UK.

If you have left Richmond and would like to update any information we hold about you (e.g. contact or career details), please contact us at <https://alumni.richmond.ac.uk/> or alumni@richmond.ac.uk, or +44 (0)20 8332 8341 or by post to Richmond The American International University in London, Development and Alumni Relations, Queen's Road, Richmond upon Thames, TW10 6JP, UK.