

# Data Protection (Fair Processing) Policy - Students

# **DATA PROTECTION (FAIR PROCESSING) POLICY - STUDENTS**

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| Prepared by    | President and Executive Board Member<br>Project and Compliance Lead   |              |     |
| Reviewed by    | President and Executive Board Member<br>Head of Student Experience and Academic Registry<br>Project and Compliance Lead |              |     |
| Approved by    | The President and Executive Board Member  |              |     |
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| Custodian      | Academic Registry   |              |     |

## **Revision History**

| Revision No. | <b>Revision Date</b> | Section No. | Remarks      |
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| 1.0          | August, 2022         |             | New Document |
|              |                      |             |              |
|              |                      |             |              |

## Dissemination

Through OUC Student Support Service Portal to all OUC students.

#### **Internal Control and Validation**

To ensure compliance with this policy and procedure:

- The Dean, Academic Affairs is responsible for the implementation,
- The Project & Compliance Lead will monitor from the internal audit,

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## **1.1. Policy Objective**

- 1.1.1. Oryx Universal College (OUC) needs to obtain and process certain information about our students to allow us to register students, organize programmes, and to carry out other essential day to day activities.
- 1.1.2. The policy includes data pertaining to but not limited to students Qatar Identification Cards, birth certificates, copies of original transcripts and secure financial information of students / guardians.

## **1.2. Domain of Implementation**

- 1.2.1. The College cannot exercise its responsibilities and fulfil its education, training, and support obligations to its students without holding and using this personal data.
- 1.2.2. OUC process student's personal data for recruitment, admission, enrolment, the administration of programmes of study and student support and associated funding arrangements, monitoring performance and attendance, supervision, assessment and examination, graduation, and alumni relations, advisory, pastoral, health and safety, management, research, statistical and archival purposes.

#### 1.3. Definitions

| Coursework       | Any piece of continuing assessment, formative assessment that will count towards final grade of the module.  |
|------------------|--|
| Canvas           | Online study portal and submission of assessments.   |
| Personal<br>Data | Data i.e., age, disability, gender reassignment, marriage, or civil<br>partnership (in employment only); pregnancy and maternity; race;<br>religion or belief; sex; sexual orientation, etc. |
| Assessment       | Coursework and examinations completed by students for a module as a part of formal assessment.   |

#### 1.4. Abbreviations

| OUC  | Oryx Universal College              |
|------|-------------------------------------|
| DPL  | Data Protection Law                 |
| GDPR | General Data Protection Regulations |

| MOEHE | Ministry of Education and Higher Education |
|-------|--|
| QAA   | Quality Assurance Agency                   |
| SAR   | Subject Access Request                     |

## **1.5. General Principles**

- 1.5.1. The information OUC collects is stored safely and securely, used fairly, and not disclosed to any other person unlawfully. To do this OUC complies with the Law No.13 of 2016 Concerning Personal Data Protection (the "DPL").
- 1.5.2. The College and all staff or others who process or use any personal information must ensure that they follow the College's Data Protection Policy.
- 1.5.3. Students can find further information and a copy of the Data Protection Policy at <a href="https://www.ljmu.ac.uk/aboutus/data-protection">https://www.ljmu.ac.uk/aboutus/data-protection</a> or in student handbook.
- 1.5.4. If you have any questions about the College's data protection procedures, you can contact the College directly or through email.

#### 1.6. Policy Items

- 1.6.1. OUC processes applicants and student data to meet statutory and other binding obligations. These may include submission of statistical returns to government or its agencies, including the Ministry of Education and Higher Education (MOEHE) and or other equivalent bodies in Qatar and the UK.
- 1.6.2. OUC discloses student's personal data to other third parties only with their consent, or if requested by an organisation with a statutory function, such as the police, in a case where non-disclosure would prejudice law enforcement; or to meet a statutory or regulatory obligation; a court order; in a medical emergency, or otherwise, in accordance with the terms of the Law No.13 of 2016 Concerning Personal Data Protection in the State of Qatar.
- 1.6.3. OUC does not release any information to parents, or other sponsors, without student's consent or in very particular circumstances around the protection of health as outlined in the General Data Protection Regulations.

- 1.6.4. While parents or sponsors may pay tuition fees, this does not give them a right of access to student's personal information. All necessary information will be issued to self, the student, directly. It is then student's responsibility to pass relevant information onto other parties i.e., parents or sponsors.
- 1.6.5. In some cases, the College may ask students to sign an agreement to seek students' permission to provide information directly to a sponsor, e.g., an employer. In this event student is giving their permission for the College to provide this information directly to the sponsor.
- 1.6.6. OUC cannot reveal personal information about students to other students. Within the terms of the Law No.13 of 2016 Concerning Personal Data Protection the College discloses student information to a variety of recipients including:
  - 1.6.6.1. Employees and agents of the College (on a strictly need-to-know basis)
  - 1.6.6.2. Local Authorities (e.g., tax & other benefit purposes, including fraudulent claims).
  - 1.6.6.3. Relevant government departments and other public bodies to which the College has a statutory obligation to release information, including the financial institutions e.g., Bank or Loan Company; and the Quality Assurance Agency (QAA).
  - 1.6.6.4. Sponsors who are who are providing financial assistance to students through tuition fees assistance and/or partial or full scholarship.
- 1.6.7. OUC will release information to other bodies if they have a statutory right of access, if the College has a data sharing agreement with them, such as the Students Council, or if those bodies can successfully demonstrate that they require the information for certain purposes, such as:
  - 1.6.7.1. Affiliation to a Professional Body
  - 1.6.7.2. Degree Apprenticeships
  - 1.6.7.3. The detection and prevention of a crime
  - 1.6.7.4. The apprehension or prosecution of an offender
  - 1.6.7.5. The assessment / collection of any tax/duty or any imposition of a similar nature

#### 1.6.8. These bodies may include:

- 1.6.8.1. The Police and Security Services,
- 1.6.8.2. Visa & Immigration Agency,
- 1.6.8.3. Department for Work,
- 1.6.8.4. Local Authorities,
- 1.6.8.5. Health Authorities, and
- 1.6.8.6. Others or similar.

#### **1.7. Policy Considerations**

- 1.7.1. Only certain College staff are authorized to make such releases in accordance with the Laws Concerning Personal Data Protection.
- 1.7.2. The College may require doing data sharing with Local Police where personal data of students can be shared and crime detection or prevention can be aided by its release.
- 1.7.3. The College has a data sharing agreement with the Liverpool John Moores University.
- 1.7.4. If you have disclosed a disability this information will be disclosed to only those who need to know and so that any reasonable adjustments can be made for your benefit. Some disability information is anonymised for statistical purposes.
- 1.7.5. Students who support the College quality processes as a student representative or panel member will do so in accordance with the Laws Concerning Personal Data Protection.
- 1.7.6. The College will only disclose sensitive personal data (age, disability, gender reassignment, marriage, or civil partnership (in employment only); pregnancy and maternity; race; religion or belief; sex; sexual orientation) where there is a legal basis for doing so and always in compliance with the Laws Concerning Personal Data Protection.

#### 1.8. Students Rights

Students have the right to:

- 1.8.1. Find out what personal data the College holds about them, why it holds it and what it does with it, how long it keeps it and to whom the College discloses it.
- 1.8.2. Request the College to correct inaccurate data.
- 1.8.3. Request the College not to process information about student that causes he/she substantial, unwarranted damage or distress.
- 1.8.4. Request a copy of student's personal information held by the College. This is known as a subject access request (SAR).

- 1.8.5. Student can request SAR for third parties by writing an email to Academic Registry at <a href="mailto:registry@oryx.edu.ga">registry@oryx.edu.ga</a>.
- 1.8.6. The College has 28 days to comply with student's request after receiving proof of identity any further information needed to find the information requested. There is no charge for this request.

#### **1.9. Your Responsibilities**

## 1.9.1. Next of Kin/Emergency Contact Details

- 1.9.1.1. All students are asked to provide next of kin or emergency contact details.
- 1.9.1.2. In the event of an emergency the College may need to contact your next of kin or another relevant person, authorities or third parties.
- 1.9.1.3. However, this information will only be used in exceptional circumstances.

#### 1.9.2. Student email addresses

- 1.9.2.1. These are published in the College's Outlook Address Book.
- 1.9.2.2. This is for internal access only.
- 1.9.2.3. You should not pass on anybody's email address without their express permission.
- 1.9.2.4. The College will, on occasion, send emails to all students about important academic information, or information/advice that may be of benefit to its students.
- 1.9.2.5. All staff are instructed to conduct College business via the students' OUC email account and therefore it is very important to ensure you regularly check your OUC email account for information.

#### **1.9.3.** Study Information

- 1.9.3.1. When you commence study, it is your responsibility to retain your copy of the Confirmation of Enrolment or Confirmation of Re-Enrolment as some employers require detailed information regarding the enrolled modules.
- 1.9.3.2. Information in respect of modules, methods of assessment, etc. are available on the College's website through programme handbooks.

#### 1.9.4. Student Assessed Work

- 1.9.4.1. Retention of copies of examinations are responsibility of students. Student are advised to ask for a copy from their module tutor.
- 1.9.4.2. The College will retain coursework / examinations submitted in hard copy for a period of 6 months following submission.
- 1.9.4.3. However, coursework submitted electronically via the Canvas will be kept perpetually whilst the student remains fully enrolled (with an active IT account) for the duration of the programme of study, in line with student access to work submitted via the Canvas.
- 1.9.4.4. If assessments are to be kept longer as exemplars, permission of the student(s) should be sought and anonymised where necessary.

#### 1.9.5. Publication of Results

1.9.5.1. Details of academic awards are only released to prospective employers with the agreement of students.

#### 1.9.6. Transcripts and Degree Certificates

1.9.6.1. Information on how to obtain further copies of transcripts and degree certificates after leaving the College can be requested at <u>registry@oryx.edu.qa</u> or directly.

#### 1.9.7. Retention of information

- 1.9.7.1. OUC will keep a full student record for the duration of your studies at OUC, plus one year.
- 1.9.7.2. After this time the only documentation that the College guarantees to keep in perpetuity (always) will be a transcript of your results, and the information required for the Higher Education Achievement Report.
- 1.9.7.3. Certain materials may be held for longer periods to comply with legal requirements, for quality assurance purposes, to meet professional body requirements, or the needs of a validation body.

1.9.7.4. All these information will be held, wherever practicably and appropriately, anonymously or with the consent of the student concerned.

#### 1.10. Advice and Information

- 1.10.1. The OUC Academic Registry Staff are available to advise Students on matters such as concerns about Data Usage, Disclosure, etc. procedures. If students wish to contact, they can do so at Academic Registry.
- 1.10.2. OUC provides full support to queries regarding the student record for the duration of your studies at OUC, plus one year.
- 1.10.3. After this time if you have any queries or concern regarding data processing fair notice, please email at <u>registry@oryx.edu.qa</u>.
- 1.10.4. Information on this Policy Procedures are available on the College's Webpages at https://www.oryx.edu.qa/policies/ or by contacting the Academic Registry via telephone numbers +974 4021 0000 or via email at <a href="mailto:registry@oryx.edu.qa">registry@oryx.edu.qa</a>.
- 1.10.5. Further information and contact details are also available on the College Web pages at https://www.oryx.edu.qa/.