Careers Service privacy notice

How we use your information when you use the Careers Service

This privacy notice tells you what to expect us to do with your personal information when you use UCLan's Careers Service and our careers systems which are made available to all students and graduates. Personal information (or personal data) is any information which relates to and identifies you. Data protection legislation (the UK General Data Protection Regulation (UK GDPR), the EU GDPR (where applicable), and the Data Protection Act 2018 DPA)) set out how we should handle your personal information.

Our contact details

The University of Central Lancashire Higher Education Corporation is the data controller for the personal information we process, unless otherwise stated. We are registered with the Information Commissioner's Office and our registration number is Z5512420.

There are many ways you can contact us, including by phone, email, social media and post. See our <u>main contact details</u>.

You can contact the Careers Service by email on careers@uclan.ac.uk.

Our Data Protection Officer

UCLan's Information Governance Manager & Data Protection Officer can be contacted on DPFOIA@uclan.ac.uk. Further information and contact details can be found on our data protection web pages.

What personal information will we use?

The Careers Service holds information about all enrolled students and graduates in order to provide careers support throughout your time at UCLan and after you graduate.

When you become a UCLan student, an account is automatically created for you within the Careers Service, using information from our student records system. That information includes Student ID, Student Registration Number, First Name, Surname, UCLan email address, personal email address, mobile number, landline number, home address (although this is not displayed until your account is converted to a graduate account), which campus you study at, term time address, date of birth, ethnicity, gender, whether you are a care leaver, disability codes (if you have declared a disability), your personal tutor's name, whether you are an international student, your course history at UCLan, the modules that are you undertaking on your course, your UCLan school, your year of study, mode of study, funding type and whether you are a finalist.

We also use information you provide about your education, work experience, achievements and skills entered into the CV/resume builder; and any other career, study or employment-related and biographical information (including your photograph) which you submit in the process of using the service. We will also hold additional information that we generate through our interactions with you while providing careers support and advice, which will include:

- details of appointments and event bookings along with career intervention notes from discussions with your Career Adviser or administrator;
- jobs of interest, including role, company and location from your use of the job search engine;
- other information relating to career development, including responses to survey information and other documents you upload;
- personality and preference data, including personality traits, strengths, motivators and career aspirations generated as a result of career assessments;
- social media data you choose to provide, such as links to LinkedIn or Twitter profiles; and
- usage and log data automatically collected when you use our online careers systems, including general location (country); device information (desktop/mobile/tablet); and the areas of the websites associated with the systems that you have viewed.

When you complete and pass your course, your account within the Careers Service will be converted to a graduate account. You will be notified of this change and asked to change your password. We will use your personal (non-UCLan) email address to create/preapprove your graduate access to some of our careers systems.

Why do we use your personal data?

We will use your personal data to provide you with a careers service, which includes access to a variety of systems we make available to students and graduates, with a view to providing you with the tools and resources necessary to improve your career development. The careers support we make available is intended to help you to become more able to develop your career and take ownership of your career development.

The Careers Service, and the systems it makes available to you, provides you with thousands of careers resources which can help with all aspects of planning your career and the recruitment process. This may appear as e-learning content, employer and career specialist videos or articles on careers-related topics. You can also use a range of 'tools' such as a CV 360, Interview 360, Aptitude Tests, Careers Assessments and many more. You can search for vacancies via our systems and save your searches to receive email notifications of opportunities. Our systems provide an online way of you interacting with UCLan Careers. You can request a CV Check, take your 'Career Pulse' (how employable you are), communicate with us via live chat and engage with online courses specifically created for UCLan students and graduates.

We will use your personal data to communicate with you via email (using your personal and/or UCLan email address), post, telephone, text (SMS), social media or other methods, as appropriate, about the careers services and support we are able to provide to you. We will also keep you informed about events, opportunities (including job and internship vacancies) at UCLan and those of our registered recruiters, as well as sending you newsletters, e-magazines and any information you register to receive via any of our careers systems. You can opt out of receiving communications which are considered to be marketing by contacting careers@uclan.ac.uk or by changing your contact preferences within our careers systems. You can also unsubscribe by clicking the link at the bottom of every email we send. It is not possible to opt out of, or unsubscribe from, service emails which are essential to the operation of our systems.

We will also use your personal data to comply with legal or regulatory requirements and to monitor usage and accessibility to enable us to make improvements to your experience of using the Careers Service and our systems.

The Careers Service will keep records and will retain some information about you and your use of the Service and our systems even if you decide you no longer want to continue to receive careers support. This is because we need to keep a record of the support we have provided to you up to the point you decided to stop using the service. This is for our own business purposes and in case we receive any complaints or concerns about the service we provided to you.

What is the lawful basis for this processing?

The University can only process personal data about you if there is a lawful basis from the UK GDPR which allows us to do so.

When you use the Careers Service and our systems, a profile will be created and data collected and used for the purposes outlined in this privacy notice. The lawful bases on which we rely for processing personal data for these purposes are as follows:

Article 6(1)(c), which allows us to process personal data when it is necessary to comply with a legal obligation. We are legally required to provide some reports and statistics to external agencies, as well as monitoring compliance with laws relating to equality and diversity, among other things.

Article 6(1)(e), which allows us to process personal data where it is necessary to perform a task in the public interest. Some internal reporting and monitoring, research, and the provision of student support, is carried out as part of our public tasks.

Article 6(1)(f), which allows us to process personal data where it is in our, or someone else's, legitimate interests to do so and it does not unduly prejudice your rights and freedoms. We rely on this condition to, among other things:

- Hold information about the fact you have successfully enrolled and/or graduated and are eligible to receive support from the Careers Service and access our systems.
- Provide you with careers support; help you to improve your career development; assist you with producing a CV; assist you with finding and applying for suitable jobs; and deliver any other aspect of providing careers advice and associated support and development.
- Send information about our services to you, including job vacancies and events relevant to your career interests, unless you tell us not to.
- Produce some internal reports, research and statistics. It is in our legitimate interests to
 use these to evaluate, plan and assess how the University is operating and make any
 changes we think are appropriate and will benefit current and future students and
 graduates.

We also process some information only if you provide your consent. In this case, **Article 6(1)(a)** applies, and **Article 9(2)(a)** applies where the information is special category data (special category data is information about your race, ethnic origin, political opinions, religious beliefs, trade union membership, genetic data, biometric data used for ID purposes, health, sex life or sexual orientation).

Where we process special category data and data about criminal convictions for the purposes set out in this notice and do not rely on your consent, we rely on the following lawful bases from the UK GDPR and DPA:

Article 9(2)(g) UK GDPR, which allows us to process special category data if the processing is necessary in the substantial public interest and there is a basis to do so in law. The law which allows us to rely on Article 9(2)(g) is section 10 DPA by virtue of Schedule 1 DPA, which also provides the lawful basis for processing data about criminal convictions. The specific conditions from Schedule 1 DPA on which we rely for this type of processing are as follows:

- Schedule 1(6), which allows us to process special category data and/or data about criminal convictions to comply with a statutory or legal function. Such functions include the duties set out in the Equality Act 2010 and the requirement to comply with the registration conditions imposed on us by the Office for Students under the Higher Education and Research Act 2017.
- Schedule 1(8), which allows us to process special category data to monitor equality of opportunity or treatment.
- Schedule 1(10), which allows us to process special category data and/or data about criminal convictions to prevent or detect unlawful acts.
- Schedule 1(11), which allows us to process special category data and/or data about criminal convictions to protect the public against dishonesty, such as when we provide information to assist regulators to carry out their functions.
- Schedule 1(18), which allows us to process special category data and/or data about criminal convictions to safeguard individuals at risk and children.

When processing special category data or data about criminal convictions in reliance on the above conditions from Schedule 1 DPA the University must have an appropriate policy document, which can be read here: <u>Data Protection: Processing special category data and criminal convictions data</u>.

Article 9(2)(j) UK GDPR, which allows us to process special category data for archiving, scientific or historical research purposes or statistical purposes, where there is a basis to do so in law. The law which allows us to rely on this basis is **section 10 DPA** by virtue of **Schedule 1(4) DPA**. We may also rely on Schedule 1(4) DPA if we process personal data relating to criminal convictions for archiving, research or statistical purposes

Who will my personal information be shared with?

We only share your personal data with another person or organisation where the law allows or requires us to and we consider it to be appropriate under the circumstances, or you request that we share it e.g. by using our systems to submit a CV or job application to your chosen recruiting organisation.

We may also disclose your information to other organisations so that they can provide services on our behalf e.g. hosted IT services and systems such as ABIntegro, which is provided by a company called the Access Group, CareerHub, which is provided by a company called Symplicity and Handshake. These organisations are called data processors. We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will hold it securely and retain it for the period we instruct.

Sending your information outside the European Economic Area (EEA)

Occasionally we may need to send your personal information outside the European Union (EU)/EEA e.g. to obtain a service from a data processor. We only transfer personal data outside the EEA if there is a lawful basis to do so and appropriate safeguards are put in place to protect your information and ensure it remains secure.

How long will we keep your personal information?

If you complete and pass your course but do not create a graduate account (or do not engage with a graduate account that is automatically created for you) within our careers systems, the information we hold to pre-approve your account, and any information created or generated while you were an enrolled student, will be deleted after the end of the academic year six years after you completed and passed your course.

If you do use our careers services and systems as a graduate, the information we hold to pre-approve your account, and any information created or generated while you were using our services or systems as a graduate, will be deleted after the end of the academic year six years after your last use of the systems.

If you subsequently request that your careers account is reactivated after six years of inactivity, the information we hold to pre-approve your account, and any information created while you were using the systems and services as a graduate, will be deleted after the end of the academic year six years after your last use of the systems.

If you withdraw from your course at UCLan without receiving an exit award, information we hold to pre-approve your account, and any information created while you were using the system as a student, will be deleted after the end of the academic year one year after you have withdrawn.

Your data protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. Further information about each of these rights can be found on the <u>Information Commissioner's Office website</u>.

Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. For further information or to make a request, please see the <u>data protection pages</u> of our website.

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing

You have the right to object to any processing we carry out, if we carry it out on the basis that it forms part of our public task or is in our legitimate interests. You also have the right to object to your personal information being used for direct marketing purposes.

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information because we have your consent or because it is necessary for your student contract, and the processing is automated.

Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us in the Careers Service and we will respond. Alternatively, you can contact the Information Governance Manager & Data Protection Officer.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the Information Commissioner's Office, which is the UK supervisory authority for data protection. Further information can be found on the <u>data protection pages</u> of our website.