**Personal data that UWE Bristol students process**

Background

UWE Bristol students will ordinarily process personal data for two main purposes:

* To pursue and complete a programme of study with UWE Bristol, for example to conduct research and submit as part of an essay, report or dissertation thesis.
* To carry out research for or on behalf of UWE Bristol.

There are a variety of different methods in which UWE Bristol students may process personal data.

Determining when UWE Bristol are responsible for the personal data processed by students

UWE Bristol is only responsible for personal data when the University is the data controller. A data controller is the main decision maker who decides the purposes and means of the processing of personal data. Therefore, UWE Bristol is only responsible for the personal data processed by students when students process data for a purpose defined by the University.

The following scenarios are the most likely circumstances in which students will ordinarily process personal data whilst studying at UWE Bristol.

Scenario one

**A student processes personal data in order to pursue a UWE Bristol course/programme of study; for example, as part of a dissertation project/thesis the student agrees with their supervisor to conduct interviews that involves collecting personal data.**

In these circumstances, students do have responsibilities under data protection laws for the personal data processed by them in order to pursue their studies and UWE Bristol is not the sole data controller in law. Students ordinarily undertake or pursue a UWE Bristol course for their own purposes, usually for them to obtain a qualification. The student is not employed by the University nor acting as an agent for UWE Bristol, and in these circumstances is not carrying out the activity on behalf of the University. In discussion with their supervisor, the student will select the research project they will undertake and the way in which they will do it. They also decide what personal data they will need to process and include in their written submission to the University. UWE Bristol students will make these decisions themselves in order to prove that they are capable of completing a UWE Bristol course. The student is therefore working on their own behalf and not on behalf of the University. Therefore, as indicated above, the University is not categorised as the sole data controller in law for the personal data processed by the student in the course of their studies.

Although in this example the student may have sought agreement by their University dissertation/project supervisor, this does not make the University solely responsible for the processing of the interviewees' personal data. The supervisor will advise the student on a variety of project/dissertation elements. This includes giving advice on data protection issues to assist the student in undertaking good research practice (see student GDPR guidance issued to them by their supervisors).

If students follow all relevant guidance, supported by their supervisors, it is extremely unlikely there will be a significant data protection related incident. However, if one does occur, with possible related consequences, UWE will support individuals involved by minimising any potential impact.

Scenario two

**A student submits a piece of work to the University for assessment that contains personal data that they collected as part of their UWE Bristol course/programme of study.**

UWE Bristol become the sole data controller for any personal data remaining within the work submitted only at the point it was submitted to the University. UWE Bristol become responsible for the processing of the personal data within the submitted piece of work where it is processed specifically for a University purpose. For example, the piece of work will be processed by member(s) of staff (e.g. administrative functions and reading by assessors for assessment purposes) to allow the University to determine the mark/grade the student should be awarded. Additionally, if the University decide to make the piece of work more widely available to the rest of the University (e.g. publish it in the University Library), UWE Bristol is responsible for the processing of the personal data as this is for a University purpose.

Scenario three

**A research student processes personal data whilst working on a project for UWE Bristol.**

UWE Bristol is the data controller for personal data processed by the research student in this scenario only if the student processes personal data in accordance with University policy, process and the instructions given by their supervisor. In this scenario, the research student is processing personal data for the purposes defined by the research project, which is ordinarily defined by UWE Bristol (e.g. by a University employed individual). The research student may contribute ideas about the purposes for processing personal data but they will have no authority to take those ideas forward without the appropriate UWE Bristol approval(s). Therefore, the purposes for processing personal data in this scenario is UWE Bristol’s. As a result, UWE Bristol is the data controller and the research student is an agent of the University. This is the case regardless of funding arrangements.

**Need more help?**

The scenarios explored here are not exhaustive and are not representative of all possible circumstances where UWE Bristol students process personal data. If you have any questions about the contents of this statement or need more help determining data protection responsibilities, please contact the University’s Data Protection Office by emailing dataprotection@uwe.ac.uk.