Layered Privacy Notice

Activity/Processing being undertaken: Employability and Careers (previously known as 'Student Futures')

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation ("the legislation"), that is, the UK Data Protection Act 2018 ("DPA 2018") and the General Data Protection Regulation: EU 2016-679 ("GDPR") as amended by "EU Exit" Regulations 2019 and now known as the UK GDPR.

Introduction to the Service

The Employability & Careers team (*previously known as Student Futures*) enhances career readiness and supports work-based learning opportunities through the following teams:

- Careers, Skills and Academic Partnerships.
- Placements & Practice Learning.
- Graduate Recruitment, Data & Engagement Team.
- Graduate Apprenticeships Team.

Who is collecting the information?

Edinburgh Napier University is the Data Controller.

Why are we collecting it/what are we doing with it (purposes)?

The main purpose is to keep a record of your activity with the University and to enable us to continue to develop a relationship with you and provide support services.

Examples of activities are listed below:

<u>Employer Engagement Services</u>

- To record and administer employer engagement in terms of events and activities with students. Please note it is standard practice to record online events, so they can be accessed for future reference.
- To enable employers to advertise jobs and events to prospective students, students and graduates.
- To record and administer employer activity in terms of job, work-based learning and apprenticeship opportunities to enhance student learning experience and contribute to student education with the University.
- To ensure that placement hosts, practice learning organisations, apprenticeship providers and other organisations are appropriately supported.

<u>Placement & Practice Learning Services</u>

- To facilitate accredited work-based learning to enhance students' learning experience and contribute to their learning and education.
- To reimburse travel costs for students who have successfully applied for the Travel Bursary.
- To comply with reporting requirements – for example HESA and Small Business Charter.
- To ensure the safety and wellbeing of students and employers whilst on placement.
- To record any reasonable adjustments made known and requested as part of placement or practice learning participation. This data will be used strictly as permitted under the legislation and in accordance with the University's Data Protection Code of Practice.

Graduate Apprenticeship Services

- To process apprenticeship applications and administer matriculation at the University.
- To monitor equality (ethnic origin, disability or health-related matters)
    - This data will be used strictly as permitted under the legislation to comply with the requirements of regulatory bodies (e.g. HESA) and equal opportunities legislation. Appropriate details of your disability will be shared, in accordance with the University's Data Protection Code of Practice, with relevant University staff on a need-to-know basis, to provide you with the best possible support for your studies. This data will not be shared with your employer.
- To ensure graduate apprenticeship students are appropriately supported.
- To engage with workplace mentors and supervisors involved in supporting Graduate Apprentice students, including inviting them to events, training, communities of practice, drop-in sessions, and networking opportunities

Careers & Skills Services

- To provide careers support to students and graduates, including appointments, email advice and group coaching.
- To record notes from student appointments to ensure tailored and inclusive support is offered by practitioners over a series of/repeat appointments. This data will be used strictly as permitted under the legislation.
- To process student, graduate and employer case studies.
- To record and administer webinars, events and activities with students. Please note it is standard practice to record online events, so they can be accessed for future reference.
- To collect feedback on service delivery.

Career Readiness Survey

- To measure learning gain on career thinking and employability, identify employability needs and provide personalised career support, guidance and communication.

Exit Survey

- To understand graduate employability, for us to identify employability needs and provide personalised career support, guidance and communication post-

graduation, information is collected as part of graduation registration. This information is also shared with colleagues in the Alumni Team.

Data analysis and reporting

- We analyse personal data to understand how our services are used, to monitor outcomes, identify trends and improve the support we provide. This may include producing statistics, dashboards or reports. Where possible, we use anonymised information. Any analysis involving personal data is via approved University third party service providers.

Funding

- To assess your eligibility for, administer, and manage any funding or grants you apply for or receive.

Who are we sharing your Personal Data with?

The University undertakes to maintain your information securely and will restrict access to employees, students (as appropriate), our professional advisers, authorised agents and contractors as relevant to the purposes. There may be circumstances where we are required to disclose data to other external third parties, including where we:

- Have a serious cause for concern of safety,
- Are required to do so under a statutory or legal obligation, or
- Are permitted to do so by legislation.

The Employability & Careers Service works alongside other university teams and where appropriate we may share information with each other to offer you the best services. This may include:

- Relevant academic staff, including but not limited to Programme Leaders, Module Leaders, Work-based Learning Lecturers and Programme Boards.
- Wellbeing & Inclusion staff
- Finance staff
- Alumni
- Global Mobility
- Occupational Health

Employers

If you are an employer, and engage with Employability & Careers, we may share your information with:

- Students, Academics, Graduates and other university departments for the purpose of promoting your opportunities and events.
- Third party organisations such as the Higher Education Statistic Agency, Skills Bodies, Sector Regulators, Funding Bodies and other partner organisations.

Students:

If you are a student or graduate, in order to facilitate placements and practice learning, the Employability & Careers Team may share your information with:

- Current or potential placement providers (including NHS for Practice Learning Services).
- Edinburgh Napier University's Finance department.
- Edinburgh Napier University employees in other areas, e.g. Schools, if necessary to provide placements and where the placement is relevant to or part of the student's course, etc.
- Employers may be provided with attendance and academic progress to ensure you are appropriately supported
- For Graduate Apprentice students, as your learning takes place within your employment and forms part of your contracted working hours, we may share relevant information with your employer. This may include attendance, engagement and academic progress, along with other information necessary to support your wellbeing in the workplace and during studies. Any information shared will be limited to what is necessary and proportionate for these purposes.

Third Party Software

Employability & Careers also use secure third-party software applications to manage data. Depending on the services you have requested or been referred to, this may include:

- **Symplicity (MyFuture) –** myFuture is used for the purpose of recording and administrating student, graduate, staff and employer activity with events, jobs, appointments. The platform provides employers the opportunity to advertise jobs and events. Your information may be shared with CareerHub support staff for the purpose of administration, providing services, communication, maintaining and updating the software. If you would like further information, pleasesee Symplicity's privacy policy at https://www.symplicity.com/support/privacy-policy

- **InPlace** - InPlace is used to manage the School of Health & Social Care placements, ~~S~~some of the information held on InPlace is shared with external agencies (e.g placement providers, NES). If you would like further information, please see InPlace's privacy policy at (Need to insert the link to the InPlace privacy notice).
- **Apprenticeships.Scot –** Apprenticeships.scot is an online hub, which is run by Skills Development Scotland, which connect people with work based training. If you would like further information, please see Apprenticeships.scot's Privacy Notice: Privacy notice - Apprenticeships.scot
- **Disclosure Scotland (PVG Checks) –** We support students with PVG Applications when required. This means we may collect the information required by Disclosure Scotland.
- **MyKnowledgemap (E-Pad) -** ePad is used as the student assessment tool to securely store, manage and share information relating to practice learning

experiences across the whole programme to support learning, compliance, and operational effectiveness. Externally, this information is shared between the different practice learning areas that a student attends, specifically the practice learning staff who are directly linked to each student and also the Practice Education Facilitators for the NHS Board. It can also be shared with external examiners.

- **QMPLE (Quality Management of the Practice Learning Environment)** is used to access and report data relating to the quality of nursing and midwifery practice learning experiences. This includes Student feedback on practice learning experiences; Quality Standards for Practice Learning (QSPL) audits and action plans and Nursing and Midwifery Council (NMC) educational audits. This may involve the processing of limited personal data necessary for operational and administrative purposes.
- **CareerSet** – CareerSet provides students and graduates with personalised AI support relating to CVs, Cover Letters, Interviews and LinkedIn Profile. CareerSet integrates with Symplicity (see above). Whilst the University funds the provision of CareerSet to its students and graduates, we do not share any personal data with CareerSet. If you would like further information, please see CareerSet's Privacy Policy: CareerSet - Privacy Policy

Students & graduates may be directed to other third-party tools, resources and event booking services. We recommend reviewing the privacy practices of any third-party services you choose to use. Third parties may also share analytical or personal data with us, to enable ongoing evaluation and continuous improvement. Please contact for further information on third party tools.

The department may record video and audio during webinars. Recordings may capture identifiable individuals and may be uploaded to public platforms such as YouTube. Reasonable steps are taken to limit the inclusion of personal information where appropriate.

Please note this list is not exhaustive.

What information are we collecting (whose information and what type of personal data)?

We collect information from individuals, employers, students, alumni, staff and workplace mentors/supervisors associated with placements and Graduate Apprenticeships who are accessing services provided by Employability & Careers. We may also require information from students at Edinburgh Napier Associate Colleges and other institutions.

The range of information we collect includes:

Data Subject	Student	Alumni	Staff	Employer
Name	**x**	**x**	**x**	**x**
Matriculation/Staff Number	**x**	**x**	**x**	

Employment details (including Job Title, Organisation, salary, mentor)	X	X	x	x
Contact Details	x	x	x	x
CV, job application, portfolio	X	x		
Alumni Status		x		X
Health Data (relating to compatibility with SHSC placements)	x			
Equality Monitoring Data (ethnic origin, a disability or health health-related matter)	x	x		
Course/Programme status	x	x		
Year of study	x	x		
Personal profile (if relevant to the activity you are participating in)	x	x	x	x
Employment & Qualification/Education Information	x	x		
Car Details	x			X
Carer/Care leaver status	x			
Attendance and progress	x	x		
Bank Details (travel bursary applications only).	x			
Details required by Disclosure Scotland (if required for specific placements)	x			
Residency Information (for Graduate Apprenticeships)	X			
SAAS Details (for Graduate Apprenticeships)	X			
Address History (for Graduate Apprenticeships)	X			
Clothing Size (if required for placement)	x			
ID Documents (for the purpose of PVG)	x			

How long is your information kept?

- A core student record is retained permanently.
- For employer, graduate and student information relating to Employability & Careers, for a maximum of 8 years
- Information will be held as per requirement for all Nursing Student records – 35 years after graduation.

What is the legal basis for processing?

Depending on the activity your data is used for, we will rely on one of the following conditions for processing: a public task, legitimate interest; contractual necessity, or your consent to process your data:

- Where processing is necessary for the management of University services the legal basis the University relies on is Article 6(1)(b).
- Where processing is necessary for compliance with a legal obligation to which the controller is subject the legal basis the University relies on Article 6(1) (c).
- Where processing is necessary to provide advice and support on academic, careers, pastoral and any relevant funding matters the legal basis the University relies on is Article 6(1)(e).

- If you are an employer, we may have contacted you directly based on information gained from publicly available sources; in this situation we are processing your data (i.e business email address) to make initial contact with you in terms of Article 6(1)(f).
- If you are an employer, you may have engaged with us to discuss how we can support your business in engaging with students and graduates, in this situation we are processing your data in terms of Article 6 (1) (a).

How are we collecting this information?

Employability & Careers team gather information through a variety of means including but not limited to:

Student & Graduate data

- Data is captured on myFuture upon matriculation, additionally, via email contact. Data will be transferred across from the University's student database (SITs).
- For School of Health & Social Care, data will be transferred across from the University's student database (SITs) and part will be entered directly onto the InPlace system yourself.
- Applications and CVs submitted by students
- Course information taken from the University's internal systems and processes.
- Travel Bursary application.
- Directly via forms.
- Other means such as email, telephone and MS Teams.

Employer data

- Data is captured on myFuture via organisation registration, additionally via email contact, Microsoft Forms, Microsoft Bookings, and other University information gathering tools where data will be stored on secure shared access drives by the Employability & Careers team.
- We may also use third party tools such as Eventbrite.
- Workplace mentor details may be provided by students, employers, or collected directly where required for the administration of placements or Graduate Apprenticeship programmes.

How secure is your information?

The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy or your personal data.

The University also makes use of a number of third party, including "cloud", services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation.

For more information please see our information online here: Cyber Security

Who keeps your information updated?

- It is up to all individuals to ensure that their information is accurate and up-to-date and notify us of any changes.
- School of Health and Social Care students can update their information themselves via SITs for contact details and directly on the InPlace system for health data.
- For further queries please contact myFuture@napier.ac.uk.

Will your information be used for any automated decision making or profiling?
No

Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.
No

Is any other information available?

This information is provided to supplement the University's main Privacy Notices, and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data.

You can access all the University's privacy notices using the following URL: https://www.napier.ac.uk/privacy-policy

You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL: https://www.napier.ac.uk/privacy-policy

If you have any questions, please email careers@napier.ac.uk.

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