Privacy Notice

Name of Process: Student Engagement Reporting (Reporting and interventions to address student non-engagement and non-attendance)

Data Controller	Edinburgh Napier University
Purposes for collection/processing	The University is committed to supporting every student to achieve their full potential whilst also fulfilling its compliance and safeguarding duties. Evidence in the sector demonstrates that student engagement and attendance are key elements of success. To this end the student engagement reporting project will pull together data from multiple sources to produce a clear picture of students who are not engaging. There are currently eight reports available. In addition, the project will support the University's obligations under the terms of its international visa sponsor licence to monitor the attendance of international visa students. Further information is available using the following URLs: https://my.napier.ac.uk/your-studies/check-in-to-class and https://my.napier.ac.uk/your-studies/student-engagement-reporting
Legal bases	The legal bases the University rely on are: Article 6(1)(e): for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller, namely the University's Statutory Instrument No. 557 (S76) of 1993: "for the objects of providing education, carrying out research, and promoting teaching, research and general scholarship", "to do anything incidental … to the furtherance of the objects of the University" and the administration and support thereof. and Article 6(1)(c), legal obligation, where the personal data is necessary for reasons of compliance with UKVI legislation.
Whose information is being collected	Students. Reports are drawing on existing student data (the student record in SITS), and usage logs from various systems, for example, Moodle, student check in App, Resource Booker, and library loans.

What type/classes/fields of information are collected	☐ Personal details, including any information that identifies the data subject and their personal characteristics, including: name, address, contact details, age, date of birth, sex, and physical description. ☐ Education and training details, including information which relates to the education and any professional training of the data subject, including academic records, qualifications, skills, training records, professional expertise, student and pupil records. ☐ Attendance and system interaction information, which may include your student number and online identifiers like IP addresses, etc.
Who is the information being collected from	From the data subject – the data is coming directly from students via their student record in SITS and usage logs from the various systems being looked at by the reports.
How is the information being collected	The data is coming directly from students via their student record in SITS and usage logs from the various systems being looked at by the reports.
Who is personal data shared with internally and externally	Reports that are viewable by different groups of University staff, including PDTs, module leaders, Student Safeguarding and Keep on Track team – requires access validation to look at the reporting, with role-based access and the reports can only be accessed while on the University network. External access will be reviewed on a case-by-case basis. Access will rarely be given to the reporting system itself, instead report data will only be shared on a needs basis, in line with legal requirements. For example, during UKVI audits the University will provide a sample of attendance and engagement data for visa students from the reports. When data is shared externally non-editable versions will be provided via MS SharePoint or MS Teams to ensure we maintain control over the document/s. The Napier check-in App is provided by Ex-Libris. You can view their Privacy Information using the following URL: https://knowledge.exlibrisgroup.com/Cross-Product/Security/GDPR
How long is the information kept for	The data is stored in each of the individual systems the reports look at; this data is managed in line with agreed retention schedules for those systems.

	If anyone exports reports, the user guidance advises them to do so in line with GDPR principles and states that any reports should be saved securely, and they should be deleted as soon as they are not required.
Will the data be used for any automated decision making	No
Is information transferred to a third country outside the UK?	No

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/privacy-notices

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/data-subject-rights