



Data Collection Policy

1. Context:

- a) This policy set outs the organisations policy, practices and processes in relation to data collection via forms, surveys, competitions and external sources, outside of that provided within the Beds SU UnionCloud website.
- b) This policy intends to cover the scope of data collection that has not already been agreed in the student contract or is not covered within the Beds SU Data Protection policies (www.bedssu.co.uk/dataprotection)
- c) It is important for that those looking to conduct any of the above activities read this policy carefully, to ensure compliance with the General Data Protection Regulation (GDPR) and that actions taken conform with the Union's privacy policy.

2. Privacy Notice

- a) When collecting personal data outside the scope of the student contract or the Beds SU Data Protection policies (www.bedssu.co.uk/dataprotection) the collector (member of staff) must ensure a privacy notice is supplied to the subject and that consent to use their data is clearing given. A privacy notice must adhere to the following:
 - i. At the point of collection the privacy notice must be offered to the subject.
 - ii. The privacy notice must explain exactly what the data will be used for and the subject must be able to give explicit consent to this.
 - iii. Subject must be able to opt in to consent to privacy notice, as opposed to opting out.
- b) The following information must be provided to the subject at the point of collection either in a privacy notice or through another means?
 - i. Identity and contact details of the controller and the data protection officer
 - ii. Purpose of the processing and the lawful basis for the processing
 - iii. The legitimate interests of the controller
 - iv. Any recipient or categories of recipients of the personal data
 - v. Details of transfers to third country and safeguards
 - vi. Retention period or criteria used to determine the retention period
 - vii. The existence of each of the data subject's rights
 - viii. The right to withdraw consent at any time, where relevant
 - ix. The right to lodge a complaint with a supervisory authority
 - x. Whether the provision of personal data part of a statutory or contractual requirement or obligation and possible

- xi. The existence of automated decision making (if in place), including profiling and information about how decisions are made, the significance and the consequences.

3. Use of Data

- a) The data collector must ensure they have systems and processes in place to ensure:
 - i. Subject access requests can be honoured
 - ii. Inaccurate data can be corrected
 - iii. Deletion of the data can be undertaken
 - iv. Data can be held without processing it
 - v. Data can be provided to subjects in an open source format
 - vi. Subjects can object to certain elements of collection and processing.
- b) If there is an intention to share data collected with external organisation outside of the Unions current data protection policies this would need explicit content from the data subject. It is also the Unions legal duty to ensure that the organisation we share data with are compliant with the General Data Protection Regulation (GDPR) and evidence of this would be required. Should an organisation that the Union share data with be thought to be in breach of the Data protection regulations, this should be reported to the Data Protection Lead immediately (su.data@beds.ac.uk)

4. Privacy Notice Template

- a) The following are examples of a typical privacy notice's that might be used for the purpose of personal data collection via information forms, surveys, competitions. Please note that these templates are to act as guidance only as they may not cover all aspects required for a specific task. If in doubt, contact the Data Protection Lead (su.data@beds.ac.uk).

- i. **Information Forms** (e.g, dietary requirements form, participation form, preferences form, nominations form etc) -

I understand and agree that by completing this [name of form] I am giving the Union explicit permission to use my details for the purpose of [what are you using the data for] only and for no other purpose. I understand that the Union will hold this information until [date that the data will be deleted, or the incident that would trigger its deletion]. This is to ensure that [reason for needing the data for the length of time required]. I understand that I can access information on what data the Union holds, how it is managed, my rights and how to make a complaint through referring to the Union privacy policy online at www.bedssu.co.uk/dataprotection

- ii. **Surveys and Questionnaire** (e.g, GOATs, Feedback, Union Research etc)

'I understand and agree that by completing this [survey/feedback form/questionnaire] I am giving the Union explicit permission to use my views in reports and statistical publications in relation to the questions asked. I understand that the views I give in this [survey/feedback form/questionnaire] will only be used for generating a report on the topic being asked and the Union we will only publish demographic data in which I will not be able to be personally identified. I further understand that I can remain anonymous by not providing my Student ID. I understand the Union will use my student ID to draw demographic data on myself from the Union's online database for analysis but once completed my student ID will be deleted and thus responses will not be able to be linked back to myself. Finally, I understand that I can access information on what data the Union holds, how it is managed, my rights and how to make a complaint through referring to the Union privacy policy online at www.bedssu.co.uk/dataprotection

- iii. **Competitions** (please note a competition may also form part of a privacy notice for a Survey or information form. This would be to be incorporated into one of the above privacy notice templates:

I understand and agree that by completing this [Competition name] I am giving the Union explicit permission to use my details for the purpose of [what are you using the data for] only and for no other purpose. I understand that the Union will hold this information until the after the competition has closed and following communication with the winner. This is to ensure that a winner can be chosen and informed via [how will the winner be contacted]. I understand that I can access information on what data the Union holds, how it is managed, my rights and how to make a complaint through referring to the Union privacy policy online at www.bedssu.co.uk/dataprotection

5. Data collection for marketing communication

- a) Collection of personal data for general marketing communications and promotional purposes is prohibited without prior agreement from the Data Protection Lead (su.data@beds.ac.uk)

6. Data obtain from external sources

- a) When obtaining personal data from external sources the external data controller will need to provide evidence that explicit agreement has been

given by the data subject to hold their data and transfer data to Beds SU. This could be seen within either:

- i. Contract
 - ii. Privacy notice evidencing the subjects opt in consent
 - iii. Privacy notice evidencing legitimate interest to share the data with Beds SU
 - iv. A data sharing agreement
- b) Should an external organisation that the Union shares or received data from be thought to be in breach of the data protection regulations at any time, this should be reported to the Data Protection Lead immediately (sudata@beds.ac.uk)

7. Staff and data collection

- a) Only staff that have completed the online GDPR Training required and signed the Data protection declaration are authorised to pursue the collection of data on behalf of Beds SU.
- b) When utilising student staff for both data collection and data entry they must also have completed an online training available via Staff Savvy and have signed the Unions data protection declaration.

8. Anonymising data

- a) To anonymise data, you must remove any personal and identifiable subject data from the data records. Once this is completed the remaining data can be stored securely for an infinitive time scale.
- b) Anonymising data must be recorded on the online data reporting portal at the point that this action is taken at www.bedssu.co.uk/drp.

9. Record of Retention Actions:

- a) All data retention actions should be online through the data reporting portal online at www.bedssu.co.uk/drp.

10. Review:

- a) This policy will be reviewed at minimum every two calendar years.