

Keele Privacy Notice for Students – Engagement, Attendance & Absence Data

This notice should be read in conjunction with Keele University's Student Privacy Notice that can be found [here](#).

Keele University is committed to looking after your data. This ancillary privacy notice details the specific data processing activities around how your engagement attendance and absence data will be processed as well as how your data will be processed by the Student Engagement Dashboard.

It applies to all students who are within scope of the Student Attendance & Engagement Policy and Procedures for Monitoring Attendance. The policy can be found on the University's [Policy Zone](#).

Your rights

You have a number of rights with regards to how we process your information including access, correction, erasure and restriction. Full details of these rights and how to exercise them can be found at <https://www.keele.ac.uk/informationgovernance/yourdata-yourrights/>

Situations in which we process use your attendance and absence personal information include the following:

Keele App

- To allow you to confirm your attendance at timetabled teaching activities via the Keele App.
- To allow you to submit absence requests and reasons for absence via the Keele App.
- To validate your attendance at timetabled teaching activities using proximity data,
- To communicate effectively with you via the Keele App regarding your attendance and support needs.

Student Engagement Dashboard

- To enable us to work with other areas of the University to enhance your student experience.
- To provide you with a greater understanding of your learning engagement.
- To provide you with accurate and earlier information on your engagement and to enable any relevant support to be implemented.
- To allow targeted discussions to take place between you and your Academic Mentors.

How is Your Personal Information Collected?

We collect information about student engagement via automated imports of relevant data from central University systems, such as the Keele Learning Environment (KLE), Microsoft Teams, WiFi use in university spaces, use of library loans, use of printing facilities.

Records of discussions between students and Academic Mentors in relation to engagement may be recorded on the My Keele Journey Engagement Dashboard.

Data on attendance and absence data is collected through information that students submit via the Keele App. This includes data on check-ins to teaching events, data on absence submitted by students and data in relation to student proximity to teaching events at the point of check-in.

We may also collect additional personal information from you if you submit reasons for absence via the Keele App, including some special category data, for example, information on health or religion.

How will we use attendance and absence data about you?

The University's commitment to using student data in ways that are ethical, beneficial, legal and proportionate are set out in the Student Data Charter.

We will only use your personal information when the law allows us to. We will process your personal information on the basis of the following conditions:

Keele App

- Where we need to perform the contract we have entered into with you (or in preparation of that contract). - Article 6(1)(a)
- Where we need to comply with a legal obligation. Article 6(1)(c)
- Where it is needed as a key part of our core tasks as a university (these will be tasks in the public interest for our official purposes as a public body). Article 6(1)(e)

Student Engagement Dashboard

- Where it is necessary for our legitimate interests, and your interests and fundamental rights do not override those interests – Article 6(1)(f)

On occasion and in relation both the App and the Dashboard, we may also need to process special category data such as health data. If this is the case, this data is processed on the basis of :

- Substantial public interest – Article 9(2)(g)

Who will my information be shared with?

We may share your data as permitted or required by law, on a considered and confidential basis, with some external organisations or third parties for example, attendance and engagement information will be shared with UK Visas and Immigrations (UKVI) and any relevant professional or statutory regulatory bodies such as the General Medical Council. For further details please see the University's Student Privacy Notice as referred to earlier in this ancillary Privacy Notice.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated Decision-Making using Attendance and Absence Data

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making. All actions taken as a result of your attendance and absences are reviewed by your academic school. We will notify you in writing if this position changes.

How long do we keep your Personal Data

The data in relation to the Dashboard algorithm will be deleted within one month after you leave the University. Academic Mentor notes will be retained for the duration of your time at the University plus a further 6 years.

Data Protection Officer

If you have any questions about this privacy notice or how we handle your personal information, please contact the University's Data Protection Officer (DPO). You have the right to make a complaint

at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

DPO contact details: dpo@keele.ac.uk

ICO contact details: www.ico.org.uk

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.