



Yorkshire Theological Education Partnership

August 2018

YTEP Moodle Site Privacy Policy

The Yorkshire Theological Education Partnership takes your privacy seriously and is committed to protecting your personal data. This privacy policy tells you how we deal with students' personal data, your privacy and the rights you have when you use the YTEP Moodle site (<https://ytep.commonawards.org>) or supply information to us.

1) Important information and who we are

Purpose of this privacy policy

This privacy notices gives you information on how we collect and process your personal data through your use of the YTEP Moodle site, including any data you may provide through this website or otherwise.

It is important that you read this privacy policy, together with any other privacy notice or fair processing notice YTEP or any of its constituent Centres/partners may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy policy supplements any other policies and notices and is not intended to override them.

The YTEP Moodle site is not intended for children and we do not knowingly collect data relating to people under the age of 18.

Data controller

The data controller of the YTEP Moodle site is the Yorkshire Theological Education Partnership, a Charitable Incorporated Organisation (registered charity no. 1157739).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

- **Name of contact:** Lynne Gordon-Taylor
- **Email address:** ytep@mirfield.org.uk
- **Postal address:** YTEP, The Mirfield Centre, Stocks Bank Road, Mirfield, WF14 0BW.

Complaints

If you have any complaints or queries about matters affecting your privacy, or any other general data protection matters, then please do let us know by contacting us as set out above and we will endeavour to resolve the problem. In any event 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 (details below). Please go to their website at www.ico.org.uk for more information.

Your obligation to inform us of changes

It is important that the personal data we hold about you is accurate and current. If your data has changed, please inform the administrator in your YTEP Centre.

2) The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

Required personal data: These are your first, middle and last names, username, email address and location (from your internet protocol (IP) address).

Optional personal data: These are more personal data which you may choose to add to your profile on the YTEP Moodle site, including a photograph.

Academic programme data: We store information about your academic programme, including length of course, start and end dates, any periods of suspension of studies, prior learning credits (APL), target award and Durham University ('Banner') identification number.

Material submitted by you as part of your studies: This includes essays and other assessed pieces of work. It also includes forum posts, quizzes, and completed feedback forms and surveys. This will always include the time and date of submission.

Marks and assessment feedback: All of your marks and feedback comments by your tutors will be stored.

Technical data: When you use the YTEP Moodle site the system automatically collects your login data, browser type and version, time-zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage data: Moodle records information about how you use our website, resources viewed, activities undertaken and materials accessed.

Communications data includes your preferences in receiving information from us and your communication preferences. If you subscribe to a forum then you will receive updates when others post to that forum, using the communications preferences set within Moodle for and by you.

We also collect, use and share anonymised **aggregated data**, such as statistical and demographic data. Aggregated data may be derived from your personal data but are not considered personal data in law as these data do **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific course or web resource. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

3) How is your personal data collected?

We collect a variety of data from users of the YTEP Moodle site using a range of different methods, including:

- a) personal data provided by you outside of Moodle, for example to your Centre when you begin your studies;
- b) voluntary data you add to the Moodle site by editing your profile;
- c) data you add as part of your studies by submitting work for assessment or participating in fora or other learning activities;
- d) marks and comments added by tutors as part of the assessment process;
- e) technical data about your IT equipment, browsing actions and patterns, which we collect automatically by using cookies and server logs. We also collect details of all your actions within Moodle through the logs built into Moodle.

4) **Purpose and lawful basis for using your personal data**

We use your data for the following purposes and with the lawful bases listed:

Purpose / activity	Type of data	Lawful basis
To provide you with services to support your learning	Required personal data Academic programme data Communications data	Your implicit contract with us to provide you with a programme of study
To enhance your interactions with other students	Required personal data Optional personal data Communications data	Your implicit contract with us to provide you with a programme of study and, in the case of optional personal data, your consent.
To assess your work and provide an academic award	Required personal data Academic programme data Material submitted by you as part of your studies Marks and assessment feedback	Your implicit contract with us to provide you with a programme of study
To administer and protect our business and the YTEP Moodle site (including troubleshooting, data analysis, testing, system maintenance, support,	Required personal data Technical data Usage data	Legitimate interests (provision of administration and IT services, network security)
To use data analytics to improve the YTEP Moodle site	Technical data usage data	Legitimate interests (to monitor and improve this service)

The YTEP Moodle site integrates with the **Turnitin** plagiarism detection service, which we use to help us assess your work. We are unable to provide you with a programme of study without using this service. Turnitin's privacy policy is accessible at <https://turnitinuk.com>. Please note that their lawful basis for processing information from YTEP is your implicit contract with us to provide you with a programme of study.

The YTEP Moodle site also provides access to the **Common Awards Hub**, a central repository of learning resources provided by the Ministry Division of the Archbishops' Council of the Church of England. Its privacy and cookie policy is available at <https://www.churchofengland.org/privacy-and-cookies>.

Third party links

The YTEP Moodle site includes links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. Please do ensure that you are familiar with any privacy notice or policy of any website you visit.

5) **Data sharing**

We share your personal data with the parties set out below for the purposes, and on the lawful bases, set out in the table in section 4 above. Types of data in ordinary text are shared routinely with the specified third party. Data in *italics* are only shared when necessary in individual cases

(eg. material submitted by you as part of your studies when a case of academic malpractice is being investigated), or in an anonymised form (eg. as sample material for external examining or academic review purposes).

Third party	Type of data	Purpose / activity
YTEP Centres / Partners (staff and tutors of <u>Church Army</u> , the Anglican Dioceses of <u>Leeds</u> , <u>Sheffield & York</u> , and <u>St Hild College</u>)	Required personal data Optional personal data Academic programme data Marks and assessment feedback Communications data	To provide you with services to support students' learning and assessment
External Examiner	<i>Academic programme data</i> <i>Material submitted as part of your studies</i> <i>Marks and assessment feedback</i>	To provide assurance of the quality of students' programmes and awards
<u>Durham University</u> (Common Awards Team)	Required personal data Optional personal data Academic programme data <i>Material submitted as part of your studies</i> <i>Marks and assessment feedback</i>	To maintain a register of students and provide an academic award
<u>Ministry Division of the Archbishops' Council of the Church of England</u>	Required personal data Academic programme data	To monitor and fund training, and to administer and protect our business and the YTEP Moodle site
<u>Moodle</u>	Required personal data Optional personal data Academic programme data Material submitted as part of your studies Marks and assessment feedback Communications data Technical data Usage data	To provide and make improvements to the software for the YTEP Moodle site, including using data analytics
<u>Turnitin</u>	Required personal data Academic programme data Material submitted as part of your studies Marks and assessment feedback Technical data Usage data	To provide and make improvements to the Turnitin service, including using data analytics
Other academic institutions	Material submitted as part of your studies	To identify instances of academic misconduct

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal

data for their own purposes unconnected with YTEP's educational purposes. They are only permitted to process your personal data for specified purposes in accordance with our instructions.

6) **Non-student users of the YTEP Moodle site**

This privacy policy is addressed primarily to rights of students. Personal data belonging to other users (YTEP staff, Centres' staff and tutors, external examiners, academic reviewers and system administrators) are also held on the YTEP Moodle site. In particular, tutors' details are collected and processed in relation to the modules that they teach and assess. The same rights and principles apply to these data subjects and to their data, which YTEP aims to handle just as sensitively and securely as it does its student data.

7) **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a genuine need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are required to do so.

8) **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting or reporting requirements.

Anonymised aggregate student and staff data, from which it is not possible to identify individual data subjects, may be retained by YTEP indefinitely. Details relating to individual students' learning and assessment, from which they can be identified, will normally only be retained by YTEP no longer than two years after the completion of their studies. Durham University retains basic academic achievement data on students who have gained its awards indefinitely.

9) **Your rights over your personal data**

- to request a copy of your personal data which we hold;
- to request that we correct any personal data if it is found to be inaccurate or out-of-date;
- to request that your personal data is erased where it is no longer necessary for us to retain such data;
- where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- to object to the processing of your personal data;
- to request a copy of your personal data in a portable format;
- to lodge a complaint with the Information Commissioner's Office. You can contact the ICO on 0303 123 1113 (9am - 5pm Monday to Friday) or via email at <https://ico.org.uk/global/contact-us/email/> or by post at:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF