

## Privacy Statement

This document details how the SLN is using and collecting data for the purposes of NCOP. This does not constitute a Data Sharing Agreement.

### Context

The SLN is funded by the Office for Students (OfS) to support the National Collaborative Outreach Programme (NCOP) which is part of a governmental initiative, aimed to improve the outcomes of young people from disadvantaged backgrounds, by providing support in order for them to progress into HE. The programme will target activities in geographical areas where HE participation of young people is low and much lower than expected, based on GCSE-level attainment. The information (data) shared will be used to:

- target specific activities for specific groups of young people
- monitor progress of the various SLN funded activities and also for the overall evaluation of the programme, measured against the aims/objectives/targets set by SLN
- track the progression of the NCOP cohort

The Sussex Learning Network, under Article 6 of GDPR has identified its' lawful basis for processing SLNCOP participant data: **Legitimate Interests 6 (1) (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller**

The University of Brighton is the lead organisation for SLNCOP and are registered with the Information Commissioner Office (ICO). Universities are considered 'Public Authorities' and the Sussex Learning Network is housed by the University of Brighton.

Any personal data tasks carried out for the purpose of SLNCOP adhere to the Data Protection Principles:

**Principle 1:** shall be processed fairly and lawfully

**Principle 2:** shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or purposes

**Principle 3:** shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed

**Principle 4:** shall be accurate and, where necessary, kept up to date

**Principle 5:** shall not be kept for longer than is necessary for the stated purpose or purposes

**Principle 6:** shall be processed in accordance with the rights of data subjects under the Act

**Principle 7:** shall be safeguarded and protected against unauthorised or unlawful processing, and against accidental loss or destruction of, or damage to personal data by the implementation of appropriate organisational and technical measures

**Principle 8:** shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

## What data will we collect?

- **personal data** – for example learner name, address, gender, ethnicity and date of birth
- **tracking data** – to allow us to monitor learners' participation in SLNCOP events, as well as future education choices and exam results
- **evaluation data** – feedback that learners gives us about their attitudes to education and about the SLNNCOP activities they take part in

## How will this data be collected and stored?

Project Partners are asked to complete activity logs detailing learner engagement in SLNCOP activities.

These are sent to the SLNCOP Data Officer who holds the data centrally for the duration of the project only. Data will be stored on encrypted and password-protected files held on a secure University of Brighton server. SLNCOP Programme Managers may request access to these files for the purposes of monitoring.

We will also enter the personal data from activities onto two trusted third-party (see below) databases of which we have individual Data Sharing Agreements in place:

1. ASPIRE: Local Authority tracking Database managed through East Sussex County Council
2. The Higher Education Access Tracker (HEAT).

## What will we use the data for?

SLNCOP will use the personal data, tracking data and evaluation data to monitor the work we are doing and to conduct research into the impact and effectiveness of NCOP activities. The data we use for this will be aggregated and anonymous (data about many participants that is grouped together, in which individuals can't be identified).

We will also use aggregated and anonymous data to produce progress and evaluation reports for our funder, the Office for Students (OfS). We may also use aggregated and anonymous data to publish research papers and reports to inform policy makers in local and central government.

## Will the data be shared with anyone else? (Third Parties)

ASPIRE: East Sussex County Council has legal obligations under the Education and Skills Act 2008 and the Apprenticeship, Skills, Children and Learning Act 2009 to assist, encourage and enable young people aged 13-19 (and young adults with learning difficulties or disabilities up to the age of 25) to participate in education or training. ESCC may pass on the information we share with them to the Department of Education.

HEAT: The Higher Education Access Tracker (HEAT) database tracks individual students through administrative databases held by organisations such as the Department for Education, the Skills Funding Agency and the Higher Education Statistics Agency. Data sharing between SLN and these agencies allows us to link NCOP participant data with information about what students go on to do. Using this personal data, HEAT will be able to track participants progress through the education system, using information shared by other national education bodies. This means we can explore in detail the relationship between participation in the programme and student success. We are required by our funders (OfS) to report on progress via HEAT.

UCAS: Data for Year 14s (leavers) will be sent to UCAS STROBE services who will access the UCAS

Applications Cycle to provide us with aggregated admissions data; enabling us to ascertain numbers of NCOP learners applying to HE. UCAS STROBE may publish aggregated data results.

We may share anonymous data with CFE Research for research and evaluation purposes only. CFE Research have been commissioned by our funders, the OfS to carry out the national evaluation of NCOP.

We will share aggregated and anonymous data with our funder, OfS, for monitoring and reporting purposes. We will also be working with local councils/local education authorities to ensure we are working with young people who will benefit most from our activities. Local councils/local education authorities will also be provided with certain types of personal information (such as postcode and name) to enable us to monitor trends in educational attainment and progression within target wards.

#### How long will we keep the data for?

SLN:COP Internal: Data will be kept for the duration of the funded programme – currently until July 2019

ASPIRE: Data will be kept until the age of 17 years to assist with tracking under national RPA (Raising the Participation Age) duties

HEAT: Data will be kept until they turn 26 years of age. This is to provide long-term data on their progress through the education system, their exam results, and potentially their employment when they leave education.

#### What are my GDPR responsibilities as a funded partner?

SLN:COP expects all funded schools/projects/programmes to have their own policies and procedures in place that are compliant under GDPR. From your perspective, the SLN is deemed as both a *Joint Controller* and *Recipient* of data and your policies should reflect this with the SLN clearly referenced.

#### Contact details for any data questions or concerns:

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