

University of Plymouth Outreach Participants

The University of Plymouth's outreach work is part of the wider national work to support students from groups underrepresented in Higher Education. By Higher Education (HE) we mean university, higher education qualifications in a further education college or higher/degree level apprenticeships. The aims are to provide relevant information to school students about HE so that they can make an informed decision on whether to continue their studies after completing school.

In order to help us demonstrate the positive impact of our outreach activities and evidence this to support continued funding, we would like to securely collect school children's personal details and may ask them to complete a short survey to gather their responses

Participant Privacy Policy

The University of Plymouth is registered with the Information Commissioner's Office [27546246](#). The University is responsible for the use of the personal data provided to it by participants. You may provide us with information directly but we may also receive it from authorised third parties including but not exclusive to:

- Your school or college
- External partners who have your consent to share your data

This privacy notice explains how we use your data in relation to the University of Plymouth.

What personal data will be processed?

When you take part in University of Plymouth outreach, we require your personal details. We use these to provide evidence of your participation in University of Plymouth outreach activities to the Office for Students (OfS) and to monitor the impact of the activities. The OfS are a public body, set up by the government, to regulate HE.

Personal details we will ask for include, but are not exclusive to:

- Your first name and last name
- Your date of birth
- Your home postcode
- Your school name
- Your year group
- Your gender
- Your ethnicity.

As part of our long-term monitoring framework, we will store this data on the secure online Higher Education Access Tracker (HEAT) database. We use this database to keep a record about your participation in University of Plymouth outreach activities, including:

- Details of your engagement with some University of Plymouth activities
- HE progression data (further study post-18).

As part of the evaluation framework of the University of Plymouth, we may also ask you to complete individual evaluation of activities, such as pre- and post-event surveys and focus groups. These are either paper based or hosted on JISC Online Surveys which operates in the UK, is governed by UK law, is GDPR compliant and meets the ISO/IEC 270001 information security standard. This data will

then be anonymised and will not be linked to any other records we hold relating to you, such as event attendance data.

How we use your data

The information that school students, parents and schools provide will be used to confirm participation in University of Plymouth outreach activities.

We will also process your data (provided by you or by a third party, such as your school or college) for the following purposes:

- To ensure that we are working with students who are from groups that are underrepresented in Higher Education (as defined by the OfS and detailed below)
- To compile statistics and conduct research for reporting purposes to government departments (e.g., the OfS and the Department for Education) and to selected third party organisations (e.g., University and Colleges Admissions Service (UCAS) and the Higher Education Statistics Authority (HESA))
- To comply with any relevant statutory obligations.

What is the legal basis of the processing?

We process data provided to us by school students, parents and schools to ensure that we are working with the students identified by the OfS as belonging to groups that are underrepresented in higher education. These groups are:

- Disabled students
- Black, Asian and Minority Ethnic (BAME) students
- Looked after children
- Carers
- Students who come from areas where participation in higher education is low as measured by the participation of local areas (POLAR) classification
- Students who come from areas of high social deprivation as measured by the Index of Multiple Deprivation (IMD)
- Mature students, i.e., students who are over the age of 21 when they start their course in higher education.

The data is processed for scientific or historical research purposes or statistical purposes and the lawful basis for this is the performance of a task carried out in the public interest. This is called Public Task. The legislation that pertains to this is explained below.

The University of Plymouth has to produce an Access and Participation Plan (APP) as a condition of its registration with the OfS. The APP requirements and obligations have developed over recent years and are embedded in the compliance aspects of OfS registration condition A1, in order to fulfil the statutory obligations of S12 in the Higher Education Research Act (HERA) 2017. This is outlined in the [HERA 2017, section 5](#) and in the [OfS conditions of registration, Part V, Condition A1](#).

Ethnicity is classed as special category data and this needs greater protection because it is sensitive. We require a separate condition for processing this data which in this case is: 'processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.'

In the Data Protection Act (DPA) 2018 there are a set of substantial public interest conditions that cover the processing of special category data. There are two that apply to the processing by the University of Plymouth:

- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- To perform our outreach activities in the substantial public interest where the law allows us to do so or for equality of opportunity or treatment.

Once a school student participates in University of Plymouth outreach activities, we will process their data as a 'public task' to provide evidence to the Office for Students that we have worked with students from underrepresented groups. We also process this data in order to evaluate the impact of our activities on students and other young people we work with.

Who will your personal data be shared with?

Within the University of Plymouth, your data is only shared with those University of Plymouth staff who need access for the processing purposes set out in this policy.

We may also share your personal details to match them with other data held by other organisations so that we can track your progress over time. These organisations are:

- The Office for Students (OfS)
- The Higher Education Statistics Agency (HESA)
- The Universities and Colleges Admissions Service (UCAS), including their STROBE service
- The Higher Education Access Tracker (HEAT)
- The National Pupil Database (NPD)
- The Education and Skills Funding Agency
- The Department for Education.

We always have appropriate contracts in place before sharing your data with any other data controllers or contractors.

Sometimes your personal data is processed by these organisations outside the European Economic Area (e.g., because they use a cloud-based system with servers based outside the EEA), and if so, appropriate safeguards are in place to ensure the confidentiality and security of your personal data.

We do not share your data with external organisations for marketing their products or services. We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

How long is your data kept?

Your personal details will be retained on the secure HEAT database for 15 years from the year you are eligible to enter Higher Education. This time period will allow HEAT to build a picture of HE access, continuation, attainment, graduation and employment outcomes.

Your rights in relation to your data

You have the right to request your personal data is rectified if inaccurate. You can withdraw your details and if you wish to do this, all your personal information will be destroyed, unless it has already been used within reports.

You have the right to object to us processing your personal data.

For enquiries about subject access requests, or if you have a data protection query or complaint, please email the University of Plymouth Freedom of Information team using the following contact details:

Email Address: foi@plymouth.ac.uk

You can write to us or email us using the following contact details:

Telephone: [+ \(44\) 01752 585858](tel:+441752585858)

Email: businessdevelopment@plymouth.ac.uk

Mailing address:

Student Recruitment and Admissions
University of Plymouth
Drake Circus
Plymouth
PL4 8AA

Please be aware that if you decide to withdraw from University of Plymouth activities, any data that has already been committed to research publications cannot be destroyed.

You have the right to lodge a complaint about the processing of your personal data with the [Information Commissioner's Office](#).

This document is effective from 1 September 2021. It is reviewed when necessary and updated on this page.