

University of Greenwich Appropriate Policy Document for Prospective Students

The purpose of this document is to outline our rationale for collecting and processing special category personal sensitive data (ethnicity, disability and care leavers).

Introduction

This Appropriate Policy Document is aligned to the University's [Data Processing Activities Register](#) and clarifies where special category personal data is processed under the conditions outlined in sections 10 and 11 of the Data Protection Act 2018, and further stated in Schedule 1 (Parts 1-3) of the Act, as necessitated in Part 4 of that Schedule. This Policy clarifies the conditions that are relied upon, the type and detail of the processing, plus how our approach to data processing aligns with Articles 5 and 6 of the GDPR.

Context

- 1) What are our reasons for wanting to collect and process personal sensitive data (ethnicity, disability and care leavers) i.e. the purpose of processing?

The University of Greenwich is proud of our historic approach to widen participation in higher education through the delivery of outreach interventions in schools and colleges, aligned to the Government's social mobility agenda to promote equality of opportunity. We continue to have an incredibly diverse student population, demonstrating our commitment and success at delivering widening access interventions. Our access work is targeted in local schools and colleges that have large proportions of students from disadvantaged backgrounds, where we raise aspirations to progress onto higher education. The work ensures that higher education is promoted to and can be accessed by everyone regardless of their background, aligned to the directive from the OfS (Office for Students).

The guidance¹ from the OfS states that as a condition of their registration, higher education providers must deliver outreach with the following groups to ensure fair representation in higher education: Care leavers; Black, Asian and Minority Ethnicity (BAME) students; Disabled students and students from low participation neighbourhoods. To measure the impact of our outreach work with these specified groups we need to record, store and process their personal sensitive data, as evaluation of this data will enable us to calculate the number and percentage of them who progress into HE, and establish the impact of our widening access work.

We deliver outreach interventions with schools, colleges and other educational providers across London and south east of England to encourage progression into HE and support attainment, with learners from year 10 upwards. Evaluation of our work then helps us see which activities or combination of activities work best in supporting people from different backgrounds to progress into Higher Education. It will also enable us to identify gaps and groups we may not be engaging and will enable us to adjust our activities to be more inclusive.

¹ <https://www.officeforstudents.org.uk/media/0bcce522-df4b-4517-a4fd-101c2468444a/regulatory-notice-1-access-and-participation-plan-guidance.pdf>

2) What are we going to do with the personal sensitive data (ethnicity, disability and care leavers)?

The University of Greenwich will use this, and all the data provided to:

- Understand the impact of our targeting to engage students from disadvantaged backgrounds;
- Understand the numbers and proportions of students from disadvantaged backgrounds that our outreach activity engages;
- Understand the short term impact of our access interventions, which will be achieved by tracking the HE application behaviour through UCAS Strobe and Exact services;
- Understand the long-term impact of our access interventions, which will be achieved through our subscription of HEAT (Higher Education Access Tracker²). This service monitors and reports on access participants for up to 15 years. The OfS expects each higher education provider to subscribe to a tracking service, enabling them to understand the long term outcomes for their outreach participants (employment and tax brackets);
- Understand the annual demographics of our access interventions, enabling us to report back to the OfS using anonymised aggregated data;
- Send additional relevant information and resources related to University of Greenwich offers and activities;
- Evaluate the success of the University's access team.

Through the Office for Students guidance (reference on page 1) the tasks above are aligned to the Higher Education Research Act 2017³, and therefore completed in the public interest. The list above relates to our access work, where we deliver interventions to promote the benefits of higher education, raise aspirations to increase HE progression and enhance attainment.

3) Why do we need to have an Appropriate Policy document in place?

Our access work with local schools, colleges of further education and other educational providers is already capturing some personal data from students from disadvantaged backgrounds, such as: full name; DOB; postcode; email address and the name of their educational provider, which we collect using the legal basis of 'public task'.

The introduction of the HERA 2017 Act has resulted in us needing to collect personal sensitive data for our access work, aligned to the guidance from the Office for Students. To enable us to meet the expectations of the Office for Students we would be grateful if our access students share their personal sensitive data (as outlined above), however, to be able to request and collect personal sensitive data we need to have an Appropriate Policy Document in place, as personal sensitive data must have extra protection protocols in place to ensure its security.

Within Schedules 1 (parts 1 and 2) of the Data Protection Act 2018, it sets out the conditions that need to be met for collecting personal sensitive data, and outlines when it is necessary to have an Appropriate Policy document in place to clarify our reasons for collecting and processing personal sensitive data:

<http://www.legislation.gov.uk/ukpga/2018/12/schedule/1/enacted>

² <http://heat.ac.uk>

³ <http://www.legislation.gov.uk/ukpga/2017/29/contents/enacted>

The condition that the University of Greenwich is using to collect and process personal sensitive data is research, as shown in the Part 1 of schedule 1 in the link above. Using this condition ensures that we are able to produce aggregated statistical evidence on the impact of our widening access work, our approach guarantees the anonymity of the data source.

The purpose of our work is to promote equality of opportunity between groups, ensuring that all groups have equal access to and success in higher education, hence the need to collect data on the groups (as shown in section 1 above) that our outreach participants belong to. The University's access work engages people from different racial or ethnic backgrounds, different states of physical and mental health and of different sexual orientation, and so meets condition 8 (Equality of Opportunity or Treatment) of Part 2 of Schedule 1 (in the link above), highlighting that our outreach work is of substantial public interest, especially as Government funding is supplied to us to deliver some of our access and participation work.

For clarity the lawful bases under which we collect, and process personal sensitive data are:

1. Research and statistical purposes
2. Substantial Public Interest: under the condition of equality of opportunity or treatment.

4) How and why the data processing under the conditions above meets the principles in Articles 5 and 6 of the GDPR, including safeguards we are employing:

1. Lawfulness, fairness and transparency

We lawfully collect personal sensitive data through two appropriate bases: research and substantial public interest, using the equality of opportunity or treatment condition. We have a fair processing system where data subjects will be briefed (at the time of data collection) on the purpose for collecting data and will be sent e-mail communications supplying our detailed privacy notice [link], which explains what we intend to do with their data. When dealing with staff in schools and colleges our privacy notice will be supplied to them before an event is delivered, enabling them to circulate to students who can then make an informed choice about supplying their data.

2. Purpose limitation

The data we collect for these groups of people will only be processed for the limited purposes specified above and access is restricted so as to prevent any additional use in other ways.

3. Data minimisation

We only collect relevant personal sensitive data from the groups that are stated in section 1 of this document, and which is limited to what is necessary to ensure that any data we collect is kept to a minimum.

4. Accuracy

The University has measures in place to ensure that data is accurate and that any inaccuracies are rectified quickly.

5. Storage limitation, retention and erasure

The data will only be stored in an identifiable form for the duration of the research and is deemed necessary for that purpose. We guarantee that our reporting is always at an aggregated level, ensuring that the data subject is anonymous. For more information about your rights as a data subject, refer to our website⁴.

6. Integrity and confidentiality

This process has gone through the University's Privacy Impact Assessment (PIA) review and approval system, which is overseen by the University's Information Assurance and Security Committee (IASC). The personal sensitive data is only processed by staff who have completed training in this area.

7. Accountability

The University has specific systems in place to ensure that the collection and storage of data, including personal sensitive data, is rigorously assessed before any data is processed. These systems are fully documented to ensure that any decisions can be scrutinised.

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⁴ <https://www.gre.ac.uk/about-us/governance/information-compliance/privacy/data-subject-rights>