

## **Privacy Statement - Widening Participation & Outreach:**

### **Widening Participation and Outreach team, within the Centre for Teaching Excellence & Success (CTESS).**

This privacy statement explains how St Mary's Widening Participation & Outreach (WP&O) team collects, uses and shares personal data, and the individuals' rights in relation to this data. It outlines the processes and rationale of data collection for our widening participation and outreach initiatives. The data collected relates to young people who have engaged with St Mary's WP&O activities through the following channels:

- Expressions of interest via email, telephone etc
- Higher Education fairs
- Widening Participation Programmes and Activities
- School visits (internal and external)
- Taster sessions (internal and external)
- Third party organisations, where individuals have expressed an interest in St Mary's WP&O activities, (such as a young person submitting our Student Data/ trip permission form to us via their school).

For the purposes of the General Data Protection Regulation ("GDPR") the Data Controller is St Mary's University.

### **Introduction**

The St Mary's Widening Participation and Outreach (WP&O) team sits within the **Centre for Teaching Excellence & Success (CTESS)**. The team has responsibility for working towards the University's milestones set-out in its Access & Participation Plans, and contributing to regular Monitoring reports for the Universities Regulator, the Office for Students. The team works on projects, programmes and activities with the aim of increasing the representation of certain groups of people in the St Mary's student body, and more broadly in higher education. The work is carried out by St Mary's and in collaboration with external partner public or not-for-profit organisations. The work involves engaging with learners who are 9 to 18-years-old, as well as other discrete groups (e.g. Mature students, Young Carers and Looked After Children). The team have access to sensitive data, such as people's personal information, disabilities, education history and broader background of their family.

### **Lawful basis for processing – dual bases**

1. The WP&O team will work with learners aged 9 – 18+, and collect and process their personal data for monitoring and tracking, on the basis of Public task:

***Public task*** - *In the exercise of official authority as a university and the Higher Education and Research Act 2017. Under the statutory guidance set out by the Office for Students in their Regulatory Notice 1 to evaluate and report on the impact of our work.*

2. In addition to the above, the Student Recruitment team will also process learner data collected by the WP&O team with the secondary processing condition of Legitimate Interest, regarding Marketing and Recruitment activities. These activities would include sending email marketing information to the learner, such as invitations to Open Days. For data collected by the WP&O team, this secondary processing condition will apply to learners who have given informed and proactive consent for these communications to be sent, and these communications will be sent to learners aged 16 and over (Key Stage 5).

***Legitimate Interest:*** *The collection and processing of data has commercial viability for St. Mary's, as well as reflecting the interest of the individual and allows us to carry out data analysis.*

## **Data collection and management**

### ▪ **What is collected?**

Data is collected from the participants of our programmes and activities, or their parents, via either a paper Student Information Form or an online form. Data collected includes names, ages, ethnicities, genders, place of education, disability, and other circumstances (e.g. being a Young Carer). We hold this information because it is required for us to report on our engagement with these groups when reporting our impact, or monitoring our work (chiefly to the Regulator, the Office for Students). The data contributes to the national landscape for widening participation and allows the University to more clearly understand the impact of its Access work.

### ▪ **How is data collected?**

Data will be most commonly requested from students aged 13 years or older (from Year 9 upwards) who are attending WP&O activities. They will be given a Student Information Form (inclusive of a clear Privacy Statement), and WP&O will explain key details, such as why data is being requested, and that they do not have to submit any information that they do not wish to.

A common-sense approach will be taken to data collection. Data is most likely to be collected from students participating in day-long events and sustained engagement projects with St Mary's (e.g. Mentoring, Residential). It is less likely that data would be requested for students attending 'light touch' events, such as a short assembly or campus tour.

Where further consent is required for residential trips, Parents/ Carers will be asked to complete a more detailed Student Information Form, stating dietary needs and emergency contact numbers.

For students aged over 16, a slightly edited Student Information Form will allow them to opt in to receive marketing communications from St Mary's, via the Global Engagement directorate. See 'How is the data used?'.  
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### ▪ **How is the data stored, and how long will it be retained?**

Sensitive data is stored on paper forms in a locked cupboard. Every two months, a member of staff or student ambassador with a DBS check will manually input these data onto the HEAT database in order to conduct analysis for reporting. Data may also be recorded in password-protected spreadsheets, where this is required for analysis and planning. Alternatively, data may be collected via a secure online form.

Data from these various sources will then be used for local reporting (with no identifying details), and where consent has been provided, uploaded to the HEAT database (see below – 'Who has access to the data?').

Within St Mary's, all hard-copy data kept by the WP&O team can be retained until August of the year after it is collected, for the purposes of activity management, reporting and evaluation. After this period elapses, hard copy data will be shredded. Electronically stored data (in our local/ cloud storage) will remain under password protection and will be retained up to 10 years from the date of collection. Electronic filing containing personal data will be briefly reviewed each August by a member of the WP&O team.

The Higher Education Access Tracker has a separate Privacy Notice and Data Retention Policy. For further information visit [www.heat.ac.uk/data-privacy-participants/](http://www.heat.ac.uk/data-privacy-participants/)

### ▪ **How is the data used?**

The data are analysed in order to create annual evaluation various reports. Some of these are anonymised, aggregated and disseminated to St Mary's departments and specific data are reported to the government via the Office for Students. The data is used to:

- Enable us to deliver events and activities on a day-to-day basis (e.g. providing for students' requirements, or sending parents information about a trip).
- Ensure the widening participation work is targeted to the desired groups of participants and that it is having an impact. The government legislates that a proportion of students' fee income must be spent on widening participation and this allows us to measure the impact of the St Mary's investment. By importing the data into HEAT, we are contributing to the national picture and evidence base for widening participation.
- For learners aged 16-18+ (Key Stage 5), contact information (email address and telephone number) may be collected, and they may be contacted with marketing information if they have consented to receive this communication (see above – 'Lawful basis for processing – dual bases'). If students proactively opt in to receive communications, a limited amount of their information will be securely transferred to Student Recruitment (name, contact information, current school/ college). More detailed personal information (Ethnicity, Disability and more WP characteristics) will not be shared. Data will not be transferred for those students who do not opt in to this process, and they will not receive marketing communications.

▪ **Who has access to the data?**

The Widening Participation and Outreach team's physical paper files and electronic files are stored within CTESS. In addition to this department, IT based colleagues have the ability to access any folder saved in the St Mary's servers and therefore are also able to access this data. Folders and documents containing personal data are password protected.

The Higher Education Access Tracker (HEAT) is an online database which lets subscribers run their own student, activity and postcode reports. Subscribers, of which St Mary's is one, are able to track individual students through the outreach process and through Department for Education, the Skills Funding Agency and the Higher Education Statistics Agency.

Data will be shared with government funding bodies and our collaborative partners. These include: The Higher Education Access Tracker; the Office for Students; the Higher Education Statistics Agency; the Department for Education; the University and Colleges Admissions Service; Local Authorities; the National Pupil Database; universities; schools and colleges; National Collaborative Outreach Programme partnerships; partner charities; and outreach partnerships such as Aimhigher London.

This data will not be transferred outside of the European Economic Area (EEA).

▪ **The individual's rights**

According to the GDPR and Data Protection Act 2018 individuals have the following rights:

Personal data that is held by St Mary's University is accessible. Individuals have the right to request the data that the university holds in relation to them. If an individual would like to request access to the personal data held they must contact the Data Protection Officer; [GDPR@stmarys.ac.uk](mailto:GDPR@stmarys.ac.uk)

The data that is held about an individual is correct and up to date. Any incorrect data is erased.

Use of personal data is restricted when it is based on the individuals consent for use. If consent is withdrawn the use of personal data is suspended without affecting the preceding lawful use of personal data.

Individuals can object to the use of any personal data if they feel it negatively impacts on their rights. If an individual is not satisfied with the processing of their personal data they can make a complaint to the Information Commissioner.

If an individual has provided consent but subsequently wishes to withdraw this. The request must be addressed to the Data Protection Officer; [GDPR@stmarys.ac.uk](mailto:GDPR@stmarys.ac.uk)

▪ **Further Information**

The University's Data Protection Officer is Andrew Browning. The Data Protection Officer can be contacted as follows:

The Data Protection Officer  
St Mary's University  
Waldegrave Road  
Twickenham  
TW1 4SX

Telephone Number: 020 8240 4267  
Email: [GDPR@stmarys.ac.uk](mailto:GDPR@stmarys.ac.uk)

If you wish to make a complaint regarding how your data has been handled then in the first instance please address this to the Data Protection Officer. If however you do not feel able to do this or you feel that your complaint has not been handled satisfactorily then you can make a complaint to the Information Commissioner. Their contact details are as follows:

Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Helpline Number: 0303 123 1113  
Website: <https://ico.org.uk/global/contact-us>

**Final Statement**

The above rights statement may be subject to review and updates. Any changes which impact the individual's experience will be communicated.