

## **ARU Schools and Colleges Engagement Team Privacy Policy**

The Schools and Colleges Engagement Team from Anglia Ruskin University (ARU) work throughout Cambridge, Essex, Peterborough and London to support young people and mature students to access Higher Education. When we work in areas where certain members of the population are underrepresented at this level, this is known as 'Outreach' or 'widening participation' (WP).

The University's Schools and Colleges Engagement Team provide a range of virtual and face-to-face events, activities, talks, programmes and competitions to help children, young people, mature students, parents/carers and teachers/advisors increase their awareness of the opportunities available in Higher Education, and the career paths this can lead to. The aim of this work is to enable individuals to make informed decisions about their future options.

The ARU Schools and Colleges Team collects information so that it can:

- Plan, manage and implement virtual and face-to-face events, activities, talks, programmes and competitions.
- Monitor participation in virtual and face-to-face events, activities, talks, programmes and competitions.
- Evaluate, research and report on the effectiveness and impact of the activities, talks and programmes, for example, to evidence where activities have increased the number of young people going on to higher education. To do this, the team collect pre- and post-event feedback, conduct interviews and focus groups, and keep a record of events and activities that individuals attend to see which of those people progresses to further study.

We collect data about students, parents/carers and teachers who take part in our activities. For students this includes name, date of birth, postcode, school or college and email address. For parents/carers this includes name and contact details, and for teachers, we collect information about job role and contact information.

### **What is the team's lawful basis for collecting your data for its Widening Participation programme?**

For planning and managing activities, monitoring participation, and evaluating, researching and reporting on impact, the team processes data under the lawful basis of 'Public Task,' as this is research for public benefit. For promoting, via email, similar events that might be of interest to

individuals who have engaged with us, we use the lawful basis 'Legitimate Interest.' Individuals are able to opt out of emails at any time.

## **What information we collect**

The ARU Schools and Colleges Engagement Team collect and process personal data about students, parents/carers and teachers/advisors who participate in our events. This may include personal details such as:

- Name
- Date of birth
- Postcode
- Email address
- School/institution or organisation
- Information relating to past and future academic progress, educational or professional background, which might include predicted grades and attainment for qualifications levels 1 -3
- Details of emergency contacts
- Bank details to award bursaries

For some events, programmes and activities, we may also use the lawful basis of 'Public Task' to collect special categories of data such as:

- Information about health conditions
- Gender
- Ethnicity
- Disability
- Care/carer status
- Gypsy/traveller status
- Service children status
- Dietary requirements

We will only collect sensitive personal information for the reasons outlined below:

- To ensure students safety and wellbeing during events, programmes, and activities. This is done with consent for the school to share such information, or we will collect such information directly from students and/or their parents/carers.
- For reporting and evaluation purposes under the substantial public interest of monitoring equality of opportunity or treatment, and for research based on our agenda to widen participation in Higher Education.

Information such as name, date of birth, postcode and email address will be gathered directly from schools and colleges under a data sharing agreement. If there is no data sharing

agreement between ARU and a school or college the team are due to work with, where possible, this to be put in place. If an individual is directly registering for an activity, they will be asked to share this data with us via online or hard copy forms.

We may contact you in future about similar events we think will be of interest to you, but you can opt out of this at any time.

## **How we use your information**

We will only use your personal information for the purpose it was collected, and when relevant, to let you know about similar events and activities that are likely to be of interest to you. Most commonly, this will include the following circumstances:

1. When we need to perform services relating to a contract that we have entered into with you, this could include:
  - For application and registration purposes prior to participating in an event, or programme of activity.
  - To support, deliver and administer prize-draws, competitions, events and programmes of activity, as well as to update or inform you about them.
  - To ensure your safety and wellbeing during our events and programmes of activity.
  - To contact you with updates and information about the events, programmes and activities you or your school/college have signed up to participate in.
  - For internal record keeping.
2. Where it is necessary for us to conduct elements of our work that are aligned with public benefit. This will usually include:
  - To monitor and evaluate the effectiveness of our programmes, events, and activities, through data tracking, research and statistical analysis in order to establish impact.
  - To take photographs, audio and video footage at our events, programmes, and activities for use in ARU digital and printed materials, communications, publications, and social media sites to promote the benefits of the work we do.
3. To provide you with information about ARU programmes, events, and activities that we think may be relevant to you, which you can opt out of at any time:
  - When you have participated in similar programmes, events and activities.
  - If you are a teacher/advisor with whom we have an existing relationship and have not objected to us doing so.

If you do not want us to use your data in this way you do not need to provide your consent, and you can use the unsubscribe link in our email communications at any time to opt out.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to comply with a legal obligation.
- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

## **How we store and protect your data**

The ARU Schools and Colleges Engagement Team adhere to the data protection and information security policies set out by the wider institution. Further information about this can be found here <https://aru.ac.uk/privacy-and-cookies>

The team also uses the national Higher Education Access Tracker (HEAT) database, as well as an internal Microsoft Dynamics 365 Customer Relationship Management (CRM) system to store the information and feedback collected from people who take part in our programmes, events and activities. A back-up copy of this data may also be stored for a short period on secure, internal cloud storage systems.

Some personal data, such as your name, may also be stored in online platforms that are used to deliver programmes, events, and activities to you and/or to present evaluation forms to you.

Your data is stored inside the UK and EEA. If data is stored outside the UK or EEA then in these rare circumstances, we have ensured that it meets the privacy standards expected.

## **How we share your data**

We will only share your data when there is a legal basis to do so. Any data we share will only be used by the third-party organisation for the purposes of:

- Delivering virtual and face-to-face activities, events, programmes, prize-draws and competitions to you.
- To conduct data monitoring, data tracking, research and evaluation in line with this notice.
- To establish impact and evaluate the effectiveness of our programmes, events and activities as part of OfS policy to widen participation in Higher Education.

For example, sometimes we need to share data from HEAT with [the OfS](#), [the DfE](#), [Higher Education Statistics Agency \(HESA\)](#) and the [University and Colleges Admissions Service \(UCAS\)](#).

If relevant, we will also share data with our [Uni Connect](#) partners at The Network for East Anglian Collaborative Outreach ([NEACO](#)) and [Make Happen](#). Please see the relevant privacy notices for each organisation if you would like to know more about how your data is processed by them.

We may also provide your school/college with details of which activities you have attended over the course of an academic year and when requested, your feedback will be reported in aggregated form. In the case of administering bursaries, your details will be shared with the ARU finance department.

Data will only be shared using secure data transfer methods and stored by us and our partners on secure systems. We and our partners will not use your personal data in any way that would affect you individually.

Any data released into the public domain by ARU or third parties will only appear in aggregate form and will be fully anonymised to prevent identification at an individual level.

## **How long do we keep your data for?**

If you are under 21 years old at the time you first engage with the ARU Schools and Colleges Engagement Team:

- Your data will be retained in HEAT and CRM for 15 years after graduation or until 30 years of age (whichever comes first).

If you are over 21 years old at the time you first engage with the ARU Schools and Colleges Engagement Team:

- Your data will be retained in HEAT and CRM for 15 years after graduation or for 10 years after your first activity with us (whichever comes first).

We retain data for this length of time so that we can look at the long-term impact of our programmes, events and activities. This allows us to establish impact by assessing whether young people who take part are any more likely to progress to Higher Education. After this time, HEAT data will be anonymised in bulk by the HEAT service according to their anonymisation protocols and CRM data will be treated in line with ARU policy ([see here](#)).

The Information Commissioner's Office (<https://ico.org.uk>) has approved HEAT's retention schedule which shows how long information is kept for. You can read the data privacy information for HEAT on their website (<https://heat.ac.uk>).

Back-up data stored on secure, internal cloud storage systems will be held for the duration of the academic year and deleted at the end of the Summer Term ahead of the next academic year. Anonymised data used for the purpose of reporting to internal management and external stakeholders will be kept.

This retention policy will be reviewed each year in line with the HEAT retention policy to ensure it remains fit for purpose and compliant with relevant legislation.

## **How to access your data**

You have the right to:

- Access and ask for a copy of any information ARU holds about you.
- Rectify inaccuracies in the personal data we hold about you.
- Object to certain processing of your data.

If you would like to exercise any of these rights, please contact the Data Protection Officer at ARU, [dpo@anglia.ac.uk](mailto:dpo@anglia.ac.uk).

If you have any further questions about how your data is being used, or about any of your other data rights, contact the Data Protection Officer at ARU, [dpo@anglia.ac.uk](mailto:dpo@anglia.ac.uk).

## **Complaints**

If you are dissatisfied with the way the ARU Schools and College Engagement Team has processed your personal data, or if have any questions or concerns about your data please contact [dpo@anglia.ac.uk](mailto:dpo@anglia.ac.uk). If we are not able to resolve the issue to your satisfaction, you have the right to apply to the Information Commissioner's Office (ICO). They can be contacted at <https://ico.org.uk/make-a-complaint/>

## **Changes to this notice**

We keep our privacy notices under regular review. This privacy notice was last updated in August 2021.