

Data Collection for Outreach Activities FAQs

1) Why are you collecting data?

The Universities undertake outreach activities with schools, colleges and communities across the UK, to support progression and widen participation into higher education. To make sure the activities we provide are useful and effective for young people, we need to gather certain information which we use purely for research and evaluation purposes. Under data protection law we are able to process this data because it is necessary for a task carried out in the public interest.

We collect details of individuals taking part in our activities for the following reasons:

- To plan activities
- To monitor participation in activities
- To evaluate and report on the effectiveness and impact of our outreach activities
- To understand the student journey through education and progression to HE/future careers

The data we collect is purely for these purposes and to research and evaluate our effectiveness to improve activities for the future. Nothing that could individually identify participants would be published; we use anonymised statistics for reporting purposes only.

2) What condition for processing are you using? (Articles 6 and 9 of GDPR)

Collectively the universities are using *Public Task/Public Interest* rather than consent.

We are using *Public Task* is to ensure that the University is able to carry out its public tasks in terms of raising aspirations and promoting higher education, particularly to disadvantaged groups. We need to account for the use of public funds and to measure the impact and effectiveness of our activities. This is required at University level and across the sector. We can only do this if we have good quality data and we do not believe that we would be able to get to the same position if we relied on consent. Later withdrawal of consent would also prejudice the quality and stability of the data and reporting. Some parents may forget to sign the forms or not engage with the process and this will reduce the quality of the data and our reporting. We are also seeking to reduce any unnecessary administrative burden on schools or colleges.

We have spoken about this with the Information Commissioner's Office on a number of occasions. They have been supportive of our use of these conditions and have reiterated that data controllers should only use consent as a last resort.

These activities clearly fall within the University's public tasks and our charitable objectives, and we believe this is also compatible with schools and colleges *public education tasks*.

3) Why are you informing students and parents if you're not using the consent condition?

GDPR remains focussed on transparency as well as legal basis for processing. The Universities uphold this belief and have a duty to ensure students and their parents/carers are clearly informed about the collection and use of their data - you also have the 'right to be informed' (Articles 13 and 14 of GDPR).

4) Why are you not using an 'opt in'?

As we are not processing under the grounds of *consent*, we are not required to have an 'opt in' for this data collection. We do ask for 'opt in' consent for activities such as adding parents/carers to our mailing list to find out about future events and for photo permissions etc.

5) Will you keep my data if I ask you not to?

Should a parent or child have significant concerns about the data sharing or feel that this would put them at risk in some way, we would look to remove their data from our records and understand that this data might not be shared. Under the *Public Task* condition, you have the 'right to object to processing' (Article 21) to the use of your data and the Universities understand that some families may find themselves in particularly complicated or difficult circumstances.

6) More information about the following can be found on our websites:

<https://www.shu.ac.uk/about-us/schools-and-colleges-liaison-office/data-protection-statement>

<https://www.sheffield.ac.uk/outreach/data>

- Why we are collecting data
- What personal data we collect for individuals taking part in our outreach activities
- How we use your data and how we keep it secure
- How long we keep your data (retention policy)
- Your rights