

## GMH Data Collection & GDPR Compliance

GMH UniConnect data collection processes have been signed off by the host legal department within Manchester Metropolitan University.

### 1. Who are we?

- Greater Manchester Higher (GMH) is a collaborative network of higher education providers in Greater Manchester who are working together to provide high quality, impartial information, advice and guidance about higher education. GMH is one of 29 partnerships within the UniConnect Programme (formally NCOP). The aim of the programme is to work towards the government's goal of doubling participation in HE amongst underrepresented groups by 2020.

### 2. Who are the partners?

- The programme involves 17 partner organisations who will be sharing personal data from an approximate cohort of 30,900 learners within the Greater Manchester area (Please see the attached Destination Tracking Form for a list of partners).

### 3. What are we doing?

- The programme is highly targeted. Data has been provided by the Higher Education Funding Council for England (HEFCE), which is now part of the Office for Students (OfS) around electoral wards where HE participation is lower than expected based on key stage 4 attainment. The work of GMH focuses on providing intensive activities with learners from year groups 9 -13 who reside in 45 identified wards in the Greater Manchester area.

### 4. What data are we asking permission to collect and process from learners?

For the purposes of **processing** learner data and **tracking** learners into future higher education/employment/training pathways. We do not track educational attainment.

- We will routinely collect and process a learners: **a) First name; b) Surname; c) Date of birth; d) School/College/Sixth form attended; e) Year group; f) Home postcode; g) Gender and their Ethnicity**. In some instances, but very rarely, we may ask for an **email address and their contact telephone number**. The purpose of processing this data is to monitor and evaluate learner activity and the benefits are that the GMH programme can make a judgement on what activities work and why they work as well as assisting learners in their progression to university/higher education.
- Learners have the right to refuse consent to the collection and processing of their data. They also have the right to complain about the use of their data and in some circumstances have the right to have their data withdrawn/deleted.

#### **Sustained/progressive programmes**

- Where a learner is engaged in one of our sustained/progressive programmes (e.g. Summer School, etc), we may ask them about their: **a) Gender; b) Medical conditions; c) Disabilities; d) Allergies; and their e) Ethnicity**. The purpose of processing this additional data is to inform planning around activities and the benefits are that additional safeguarding/health and safety protocols are in place for these activities.

### 5. What is our legal basis for processing within the EU GDPR?

- For all learners engaging from the start of the 2019/20 academic year – as a public authority acting in the public interest we rely upon the '**Public task**' lawful basis to process your personal data for these purposes. Our public interest is to: promote and widen access to higher education, particularly amongst underrepresented groups (GDPR Articles 6, 9 and 36)
- Our clear basis in law is the Higher Education (Access and Participation Plans) (England) Regulations 2018. S2(1)(f) which states that Higher Education Institutions shall monitor and evaluate their compliance of its provisions set out in its access and participation plans, and its progress in achieving its access and participation objectives. Furthermore, s2(1)(g) states that Higher Education Institutions shall provide the Office for Students

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with such information as it may reasonably require from time to time regarding the contribution that the institution has made towards furthering equality of opportunity.

- For all learners engaging prior to the start of the 2019/20 academic year we obtained their written consent via our Destination Tracking Data Collection and Consent Form to process their personal data for the specified purposes.

### **6. How do we collect their data?**

- We collect learner data in a variety of ways, but primarily in four ways: 1) Destination Tracking Forms; 2) Activity Registers; 3) Evaluations and 4) via online portals.

### **7. What is the purpose for doing it?**

- The purpose of processing this data is to monitor and evaluate learner activity which will allow the GMH programme to make judgement on what activities work and why they work as well as assisting learners in their progression to university/higher education.

### **8. Who will we share the data with?**

- All of the data that the learners' submit will be stored 1) with the institution/provider that collects it and 2) transferred to Greater Manchester Higher for monitoring and evaluation purposes.
- Personal data will be transferred to the University of Kent for the provision of the HEAT service allowing them to monitor and evaluate students progression to further education, higher education and/or on into employment as mandated by Government.
- Aggregated postcode information at a ward level may be shared with a number of other public bodies, such as:
  - CFE Research and Ipsos Mori, who are conducting elements of the National Evaluation of UniConnect;
  - the Higher Education Access Tracker (HEAT), allowing them to monitor and evaluate students progression to further education, higher education and/or on into employment;
  - the Office for Students (OfS);
  - the Higher Education Statistics Agency (HESA);
  - the Department for Education (DfE); and
  - the Universities and Colleges Admissions Service (UCAS);

**Note:** GMH is mandated by the OfS to share data with the Higher Education Access Tracker (HEAT) database.

### **9. What are the benefits of sharing the data?**

- The benefits of sharing the data (to GMH/HEAT/learners/educational establishments, etc) are:
  - to allow us to have a knowledge of student participation in targeted interventions;
  - whether there has been an increase in learner progression to HE;
  - having learners be a part of a targeted programme that delivers impartial advice and guidance about the HE sector;
  - building learner confidence in making appropriate life choices; and
  - the wider public knowing that more young people are choosing to improve their future life opportunities.

**10.** GMH has completed a **Data Protection Impact Assessment (DPIA)**, which contains the information outlined above.