

Student Privacy Note – September 2022

Greater Manchester Higher (**GMH**) is a programme run by Universities and Further Education Colleges in the Greater Manchester area to help increase the number of students making the choice of progressing onto higher education. A list of GMH partners and organisations we may share your information with is provided in Appendix I. The programme is part of the Office for Students (**OfS**) UniConnect Programme. The programme is led by Manchester Metropolitan University (**MMU**) and its members

Greater Manchester Higher needs to collect and process personal data in order to provide activities to students, manage its operations effectively and meet certain legal requirements.

Purpose of this Notice

This Notice explains how we collect and use your personal data.

The Manchester Metropolitan University is the Data Controller for personal data we process about you. The University is registered as a Data Controller with the Information Commissioner's Office and manages personal data in accordance with the University's Data Protection Policy.

Throughout this Notice, "University", "we", "our" and "us" refers to the Manchester Metropolitan University, "GMH" refers to Greater Manchester Higher and "you" and "your" refers to those students who engage with our activities and complete activity evaluations. It will also cover information that we must keep after you have completed those activities and evaluations.

Changes to this Notice

This notice was last updated on 1st September 2022.

Anything you are not clear about

If there is anything you are unclear about, please contact gmhigher@mmu.ac.uk in the first instance, who will answer any queries you may have concerning this Notice or the way in which we process your personal data. The designated owner for the Notice can also be contacted using the details found at the end of this Notice.

Where does the University get your personal data from?

We obtain or receive personal data about you from the following sources:

- Destination Tracking Consent Forms - where you provide your personal details for the purposes of providing consent for us to monitor your involvement in our activities, complete evaluations and allow for longitudinal tracking in the Higher Education Access Tracker (HEAT) system; and
- From Activity Registers used to record your involvement in GMH activities. Where we obtain personal data from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data;
- From evaluation forms that are used to gauge the impact of our activities and in some instances, the effectiveness of the activity;

Categories of Personal Data Being Processed

The University collects and processes a range of personal data about you in order to deliver our activities to you as a student, manage our operations effectively and meet certain legal requirements. Examples of this personal data will include your first name, last name, date of birth (initially through our Destination Tracking Consent Form), the year group you are currently in and your home postcode.

Personal data may also contain "sensitive personal data". "Sensitive Personal Data" means information about your Special Category Data (as defined below). We only ask for certain types of 'Special Category Data' such as Personal Data about your medical conditions; disabilities; allergies and racial or ethnic origin.

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 h) Ethnicity.

Student Privacy Note – September 2022

We also collect data at the beginning of the academic year relating to widening participation: i) Free School Meals; j) Receiving Free School Meals; k) Currently in care or have been in care in the past; l) Young carer; m) Learner with a disability; n) Neither your parent(s) or carer(s) attended Higher Education; o) Asylum seeker/refugee; and where pertinent p) Member of a military family. In some instances, but very rarely, we may ask for an email address and their contact telephone number.

The purpose of processing this Special Category Data and Widening Participation indicators is to inform planning around particular activities, such as Summer Schools, and the benefits are that additional safeguarding/health and safety protocols are in place for these activities.

Your personal data is also used to register learners on GM Higher outreach activities (activities aimed at raising awareness of and encouraging entry to Higher Education). This data may be shared with third parties and partners involved in delivery of the events or activities.

The purposes for which we process your personal data and the legal basis for that processing

The University collects and processes a range of personal data about you in order to deliver our activities to you as a student, manage our operations and maintain our records effectively, and meet certain government and legal requirements. Examples of such services include our campus visits, in-school activities or activities by third parties.

In addition to the above, we set out in Table I of this Notice the other purposes for which we will process your personal data, together with the legal basis for doing so and the categories of third parties with whom we share your personal data.

Recipients of personal data

We may disclose personal data about you to third parties listed at the end of this notice. For further information about the purpose and lawful basis upon which we rely to make any disclosures, please refer to Table I.

Retention of Your Personal Data

The University retains your personal data in accordance with Function 284 in the University's Retention and Disposal Schedule: <http://www.mmu.ac.uk/records-management/retention-and-disposal-schedule.php>

Some types of personal data are retained long after your studies have ended, for example, so that we can show the impact of our activities. Other types of data, particularly if sensitive, may only be retained for a short time.

Unwanted Communication

We will not as a matter of course communicate with you by email, post, telephone, text and social media. Where we choose to do this, if at any stage you are concerned about the content of these communications, e.g. unwanted marketing information, then:

- please follow any available unsubscribes links or instructions in the communications; or
- contact the Marketing and Communications Officer at gmhigher@mmu.ac.uk.

Transfers to third party countries

We may share your personal data with organisations within the United Kingdom, but we will still ensure that there are appropriate safeguards in place to protect your personal data.

Your Rights As a Data Subject

We thought it would be helpful to set out your rights as a data subject below. You have the right to:

- Access your personal data that we process;

Student Privacy Note – September 2022

- To rectify inaccuracies in personal data that we hold about you;
- To be forgotten, that is your details to be removed from systems that we use to process your personal data
- To restrict the processing of your personal data in certain ways
- To obtain a copy of your personal data in a commonly used electronic form (data portability)
- To object to certain processing of your personal data by us
- To request that we stop sending you direct marketing communications.
- To request human intervention where automated decisions (including profiling) have legal or similarly significant effects

If you wish to exercise any of the above rights, please contact the University's Data Protection Officer via: legal@mmu.ac.uk

Concerns and Contact Details

If you have any concerns with regard to the way your personal data is being processed or have a query about this Notice, please contact the GMH Monitoring & Evaluation Manager at gmhigher@mmu.ac.uk in the first instance.

Our postal address is Greater Manchester Higher, Manchester Metropolitan University, All Saints, Oxford Road, Manchester, M15 6BH.

The MMU data controller registration number provided by the Information Commissioner's Office is Z5710637.

You have a right to complain to the ICO about the way in which we process your personal data. Please see: <https://ico.org.uk/concerns/handling/>

Greater Manchester Higher may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 01/09/2022. This policy will be reviewed on an annual basis by the GMH Monitoring and Evaluation Stakeholder Sub-group.

Appendix I

Further Privacy Notice Information

The University is the **Controller** in respect of the personal information you submit on this form.

GMH partners include: Ashton Sixth Form College, University of Bolton, Bolton College, Bury College, Holy Cross College, Hopwood Hall College, LTE Group, University of Manchester, Manchester Metropolitan University, Royal Northern College of Music, University of Salford, Salford City College, Tameside College, The Trafford College Group, University Campus Oldham, and Wigan and Leigh College. *Please note only aggregated, i.e. anonymised data from your form is shared with all GMH partners.

Our lawful basis - As a public authority acting in the public interest the University relies on the 'public task' lawful basis. The public interest is promoting and widening access to Higher Education, particularly amongst underrepresented groups. The overall aim of the programme is to work towards the government's goal of increasing the number of young people from underrepresented groups who go into higher education. For further information, search 'UniConnect' using your preferred search engine.

The clear basis in law to undertake this activity is the Higher Education (Access and Participation Plans) (England) Regulations 2018. S2(1)(f) which states that Higher Education Institutions shall monitor and evaluate its compliance of its provisions set out in its access and participation plans, and its progress in achieving its access and participation objectives.

Your ethnicity and additional indicator information is defined as 'special category' information under the GDPR. The collection of this information is necessary for research and statistical purposes, which are in the public interest.

Your personal information may also be **shared** with third parties; including:

- The Higher Education Access Tracking (HEAT) service, who monitor and evaluate outreach activity by Higher Education providers. This will apply to HEAT storing your data or to any third party organisation that they may use to manage their database.
- HEAT may in turn share your data, for research purposes only, with organisations who have an official right to process educational data. This may include Government departments or agencies such as:
 - The Office for Students (OfS)
 - Higher Education Statistics Agency (HESA) or
 - Non-government organisations such as UCAS (application system for University/HE)

The relevant GMH Hub will retain your Destination Tracking Data Collection Form for a **one-month** period. Your personal information will be stored on the **HEAT** system for approximately 12 years after you graduate from University/Higher Education. Your data will go through an anonymisation process every 7 years.

You have a range of rights in relation to your personal information, including the right to request deletion / object to our processing, the right of access, the right of rectification, and the right to restrict processing. If you want to exercise these rights or wish to speak to us for any other reason about your personal data please contact us at: gmhigher@mmu.ac.uk.

Our Data Protection Officer can also be contacted using dataprotection@mmu.ac.uk, by calling 0161 247 3884 or in writing to: Data Protection Officer, Legal Services, All Saints Building, Manchester Metropolitan University, Manchester, M15 6BH.

You also have the right to make a complaint about the way your personal information has been used with the Information Commissioner's Office. For further information, please see: <https://ico.org.uk/global/contact-us/>

Student Privacy Note

TABLE I

Students Privacy Notice No	Specific Purposes	Legal Basis
1.	Processing of safeguarding concerns to ensure the safety and wellbeing of our students	Legitimate purpose of ensuring the safety and wellbeing of our students
2.	Monitoring student attendance at GMH activities	For all learners engaging from the start of the 2022/23 academic year – as a public authority acting in the public interest we rely upon the ‘Public task’ lawful basis to process their personal data for these purposes. Our public interest is to: promote and widen access to higher education, particularly amongst underrepresented groups
3.	To monitor our compliance with equalities legislation	Legitimate purpose of seeking to widen access to higher education, encourage diversity amongst the student body, provide appropriate support and comply with the University’s obligations under the Equality Act 2010
4.	Administration of evaluations via student surveys, focus groups, interviews and a number of evaluative methodologies	For all learners engaging from the start of the 2022/23 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 through various evaluation methodologies
5.	For research and statistical analysis into the Higher Education Access Tracker (HEAT)	For all learners engaging from the start of the 2022/23 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. This allows us to analyse student data to attendance at a variety of activities that will contribute to showing the impact of the project, namely research and analysis into higher education access
6.	Production of statistical returns required by certain third party bodies e.g. the Office for Students	Necessary for performance of a task in the public interest, namely research and analysis into higher education access

Student Privacy Note

TABLE I

Students Privacy Notice No	Specific Purposes	Legal Basis
7.	To the Higher Education Statistics Agency, the Higher Education Funding Council and Government Departments such as the Department for Education, for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable. For more information on the information shared with HESA please refer to HESA's privacy notice (this disclosure may include sensitive personal data about ethnicity, sexual orientation, gender reassignment and religion).	Necessary for the performance of a task in the public interest (statutory functions or responsibilities of Government Departments and public bodies) and for statistical and research purposes in the case of disclosures of sensitive personal data)
8.	To close family or next of kin and emergency services where there is an emergency situation such as illness or serious injury	Processing necessary to protect vital interest of students or for the legitimate purpose of ensuring the safety and wellbeing of our students
9	To other institutions the University jointly conducts research work with or contracts to conduct research work on behalf of the University	Necessary for scientific research or statistical purposes
10	To the University's insurers in respect of accidents or incidents occurring with the institution and external auditors and external regulators such as the Health and Safety Executive	Legitimate purpose of managing our insurance claims or reporting such incidents to regulators and auditors. Disclosures of sensitive personal data in this context will be made where explicit consent has been obtained, disclosure is in the substantial public interest or where necessary for establishment, exercise or defence of legal claim.

Student Privacy Note

Table 2 - Manchester Metropolitan University Records Retention and Disposal Schedule - May-2022

Function	Sub function	Records	Retention Period	IAM
284		Greater Manchester Higher records documenting the activities involved between the collaboration of universities and FE colleges across Greater Manchester to provide outreach activities.	Electronic sources – as set out in HEAT Data Sharing Agreement Online Survey – 3 years after the end of the programme	Peter Riley (Head of Widening Participation)