

# Privacy Notice

## How we use your data

**This Privacy Notice outlines how the University of Kent collects, uses, and manages the personal information of individuals in accordance with data protection law.**

The University of Kent is registered as a 'Data Controller' with the Information Commissioner's Office (ICO), under registration number Z6847902.

**The University of Kent ('the University')** collects, processes and stores information about the outreach participants, Schools, and FE Colleges with whom we work to administer and evaluate activities and track educational progression of data subjects. The University also processes information relating to student ambassadors for the purposes of monitoring, evaluation, and administration of the ambassador scheme.

## How we collect your information

To administer, evaluate, improve, and promote our programmes in pursuit of our mission, The University of Kent collects and processes certain personal data (and in some instances special category data), in accordance with the terms of its own policies and Data Protection Legislation.

Personal data is obtained from each data subject or from the school through:

- Registration forms
- Participation at events

## Categories of information we collect

The personal information we collect are:

- Full name
- Postcode
- Date of birth
- Parental history of higher education
- School name and year group/key stage
- Free school meal eligibility
- Family background
- Your opinions when you answer surveys and give feedback
- Engagement with activities data (attendance)

- Qualitative baseline data regarding data subjects' attitudes and perceptions of education, particularly higher education.

Special category data we will collect about you in connection with the collaboration and outreach programmes.

- Ethnicity
- Gender
- Disability and accessibility data for attendance purposes
- Care status
- Asylum seeker status

## How we use your personal information

We will use your data for the following purposes:

- **For the purpose of monitoring**, which allows us to fulfil compulsory external reporting requirements to regulatory bodies such as the Office for Students (OfS), as well as giving us a clear picture of the activities we deliver and people we work with.
- **For the purpose of evaluation**, which helps us understand whether the activities that we offer have been effective and actually benefit students like yourself, so we can see how to improve in the future.
- **For the purpose of improving the universities application process** if you choose to apply to study at the University of Kent in the future, we may use your information to inform and support your application.

## Will other institutions be able to access my data?

Certain other organisations will have access to the data for research and monitoring purposes only, such as the Office for Students (OfS), Higher Education Statistics Agency (HESA), the University and Colleges Admissions Service (UCAS), the Department for Education (DfE) and University of Kent partners including colleges, the Higher Education Access Tracker (HEAT) service subscribers, the Kent, and Medway Progression Federation (KMPF) and the National Data Service (NDS). Neither party will release data to any unauthorised third parties. HEAT and HESA may share your data as detailed in their own privacy notices, which you can access via:

HEAT's Privacy Notice: [HEAT Privacy Notice](#)

## Our lawful basis for processing your data

The University of Kent will rely on the following lawful basis in UK GDPR for processing your personal data as this is necessary for:

- the performance of a task carried out in the public interest or in the exercise of official authority -[Article 6\(1\)\(e\)](#)
- consent to process personal data when taking a photograph or using an image (Article 6(1)a)
- the purpose of our legitimate interests or those of a third party [Article 6\(1\)\(f\)](#) (unless those interests are overridden by your interests, rights, or freedoms)
- where special category data is shared, Article 9(2)(g) of the GDPR - Reasons of substantial public interest (with a basis in law), namely the Equality Act. Your ethnicity is being collected for the purpose of widening participation of ethnic minorities in higher education in the UK.

The University of Kent has a Special Category and Criminal Offence Data Appropriate Policy document in place throughout the time that we use your data and for 6 months after we cease to use it.

Where we rely on a legitimate interest to process your personal data our legitimate interests are as follows:

- Registering and maintaining records of pupils / tutors / programme participants / supporters / potential supporters and other individuals or organisations that The Brilliant Club works with to administer all aspects of our work.
- Fundraising activity, including communications with current and potential supporters and donors.
- For monitoring, evaluating, and researching the effectiveness of our programmes
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently.

## Who your information will be shared with

Sometimes it is necessary for your personal information to be shared:

- with competent authorities (such as the police, NCA) or action fraud for law enforcement purposes (for on substantial public interest reasons – Article 9(2)(g) – for preventing or detecting unlawful acts, safeguarding, or fraud purposes.
- with our professional advisors where it is necessary for the establishment, exercise, or defence of legal claims – Article 9(2)(f).

Occasionally the University may, if appropriate, legitimate and necessary, rely on relevant exemptions to UK GDPR provisions as are allowed under the Data Protection Act 2018 (in relation to crime and taxation, management forecasts, negotiations, confidential references and exam scripts and exam marks).

We use third party organisation (known as data processors) who carry out services on the University's behalf under contract. We will ensure that only the minimum amount of relevant personal data necessary for the purpose is transferred.

In addition, the parities may share your information with the following third parties:

- Student ambassadors supporting events
- Higher Education Access Tracker (HEAT)
- Pupil school
- Pupil parents/carers/guardians
- The Office for Students
- Other Universities
- The Department for Education

### **Photographic images:**

#### **For individuals under 18 years of age at the time the photograph was taken:**

The University will share the photographic privacy notice with both the individual and their parent/guardian. If either the parent/legal guardian or the individual objects to the use of photographs or videos by the University for marketing and publicity materials prior to the event taking place, no photographs will be taken of that person. If they object to processing after the event has taken place, digital content will be removed. However, we are unable to remove content from printed materials.

**For individuals 18 or over at the time the photograph was taken:** The University will provide them with the photographic privacy notice. If they object to the use of photographs or videos taken by the University for marketing and publicity materials prior to the event taking place, no photographs will be taken of the individual. If they object to processing after the event has taken place, digital content will be removed. However, we are unable to remove content from printed materials.

## **Transfer of your information outside of the UK**

When it is necessary for us to transfer your personal information across national boundaries to a third-party data processor, such as one of our service providers, each organisation will ensure this safeguards your personal information by requiring such transfers are made in compliance with all relevant data protection laws.

All University of Kent data for the proposes of outreach programmes, is processed, and stored within the UK.

Data will be transferred by the University outside of the UK and European Economic Area (EEA) to their processors (Qualtrics and Microsoft O365) in the United States for the purpose of data storage. The transfer is authorised by:

- Safeguards prescribed by the UK GDPR when transferring data to a third country (Transfer Impact Assessment and International Data Transfer Agreement)

## How long your personal data will be kept

- Where an individual has supplied a first name, last name, date of birth, and postcode and has not withdrawn or denied permission for their data to be included in research, their record is considered expired and should not be retained for longer than 15 years from: a) the year in which they might be expected to enter Higher Education, the date their record was created, or when they last interacted with the member, whichever of these conditions is most recent
- Incomplete Records Where personal data is considered incomplete, i.e., the following has not been captured: a) any or all of first name, last name, date of birth, postcode b) and/or the data subject's permission for inclusion in tracking research, it will be considered expired after 7 years from the date the record was created and will appear in the HEAT Retention Filter, except where a data subject has taken part in an activity within the last 7 academic years.
- Photographs and videos taken at outreach events will be stored electronically for a period of 4 years, during which they may be used for marketing and promotional materials. After 4 years, photographs and videos will be archived. Archived photographs and videos will only be used for historical and research purposes.
- The Outreach and Widening Participation Department and HEAT will retain a written summary of the data destroyed either physically or electronically. The summary will contain details of data type e.g., questionnaire, baseline student data, the data held within it e.g., date of birth, home address, the time period the data refers to and the quantity. The summary will be produced on request by appropriate bodies (e.g., funding councils).

## Security

Each party will ensure that security measures are in place to prevent the accidental loss, unauthorised use, or access to your data. Access is given to staff on a 'need to know' basis. Our staff are required to keep your data safe and complete data protection training.

We have procedures in place to deal with any data security incidents and will notify you and the ICO in the event of a data breach where we are required to do so.

## Your rights

Please be aware of the following rights which can be accessed free of charge by contacting [dataprotection@kent.ac.uk](mailto:dataprotection@kent.ac.uk):

- know how we are using your personal information and why (right to information)
- access the personal data held by us (subject access request)
- ask for correction of any mistakes (rectification)
- to object to direct marketing
- to complain to the ICO

In some circumstances you also have the right to:

- object to how we are using your information
- ask us to delete information about you (the right to be forgotten)
- have your information transferred electronically
- object to automated decisions which significantly affect you
- restrict us from using your information.

For further guidance regarding your rights please see the [ICO website](#).

## Your rights- if you have given consent or explicit consent for a specific use of your personal data

You can withdraw your consent at any time.

You can do this by contacting us at [dataprotection@kent.ac.uk](mailto:dataprotection@kent.ac.uk)

This does not affect the lawfulness of the processing based on consent before its withdrawal.

## Your right to complain to the Information Commissioner

You have the right to lodge a complaint with the Information Commissioner's Office.

Their helpline telephone number is: 0303 123 1113.

## Contacts

If you have any questions or concerns about the way the University has used your data, or wish to exercise any of your rights, please consult our website.

The University's Data Protection Officer can be contacted at:  
[dataprotection@kent.ac.uk](mailto:dataprotection@kent.ac.uk)

## Document review date

This privacy notice will be reviewed at least annually.

<b>Version</b>	<b>Author</b>	<b>Description of Change</b>	<b>Date</b>	<b>Next Review date</b>
<b>0.1</b>	UoK DPO	New draft	16/10/23	On approval to final version