

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.

How we collect your information

To administer, evaluate, improve, and promote our programmes in pursuit of our mission to widen participation in higher education, 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 you or from the school through:

- Registration forms
- Evaluation forms
- Participation at events

Categories of information we collect

The personal information we collect about you is:

- Full name
- Postcode
- Date of birth
- Gender
- Care Status
- Asylum seeker status
- Parental history of higher education
- School name and year group/key stage
- Free school meal eligibility
- Your opinions when you answer surveys and give feedback, including your perceptions of education in general, and higher education in particular.
- Engagement with activities data (attendance)

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

- Ethnicity
- Race
- Disability and accessibility data for attendance purposes

How we use your personal information

We will use your data for the following purposes:

- **For the purpose of provision and facilitation of outreach activities**, which allows us to run outreach activities such as the one you are participating in today.
- **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.

Note: Any data subject is not obliged to provide their personal data and there are no possible consequences of failure to provide such data.

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). None of the aforementioned parties 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](#)

HESA's Privacy Notice: [Collection notices | HESA](#)

Our lawful basis for processing your data

The University of Kent will rely on the following lawful basis in the United Kingdom General Data Protection Regulation ('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)

Where special category data is used we rely on

- Article 9(2)(g) of the UK GDPR - Reasons of substantial public interest (with a basis in law), namely statutory purposes for example under the Equality Act or Higher Education Research Act 2017, for safeguarding or for equalities monitoring. Your ethnicity is being collected for the purpose of widening participation of ethnic minorities in higher education in the UK.
- Article 9(2)(a) – Explicit consent (for photographs or where you ask us to consider health information for access where it is not related to a disability).
- Article 9(2)(c) – processing is necessary to protect someone's vital interests (this is only for an emergency where you are physically or legally incapable of giving consent).
- Article 9(2)(j) – processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes (ensuring that we only use the absolute minimum amount of data needed for these purposes, for example by pseudonymising or anonymising the data)

Our 'public task' lawful basis is underpinned by our obligations to facilitate widening participation as set out in the Higher Education and Research Act 2017 (in terms of the obligation to ensure we have an access and participation plan in place and we take measures to attract applications from prospective students who are under represented in higher education) and by the public sector equality duty as set out in the Equality Act 2010.

We will not use consent as our legal basis where you have no choice about giving us your information. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

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.

Who your information will be shared with

Canterbury Christ Church University, The University of Greenwich, the University for the Creative Arts and the University of Kent (KMPF partners) share the collected personal data for outreach programme purposes. There is a data sharing agreement between us.

You can find the University for the Creative Arts Data Protection Policies on their website: <https://www.uca.ac.uk/dataprotection-policies/>

You can find the University of Greenwich's Data Protection Policies on their website: <https://www.gre.ac.uk/aboutus/governance/information-compliance/privacy>

You can find Canterbury Christ Church University's Data Protection Policies on their website: <https://www.canterbury.ac.uk/university-solicitors-office/data-protection/data-protection.aspx>

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 parties may share your information with the following third parties:

- Organisations we partner with as part of the Higher Education Access Tracker (HEAT) as detailed on their [privacy notice](#)
- Your school
- Your parents/carers/guardians
- The Office for Students
- Other Universities
- The Department for Education

Occasionally 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).

Photographic images:

If you are under 18 years of age at the time of the event: The University will share the photographic consent form with you and your parent/guardian. If either you or your parent/legal guardian objects to us taking photographs or videos for marketing and publicity materials prior to the event taking place, no photographs will be taken of you. If you object to processing after the event has taken place, digital content will be removed. However, we are unable to remove content from existing printed materials

If you are 18 or over at the time of the event: The University will provide you with the photographic consent form. If you object to the us taking photographs or videos for marketing and publicity materials prior to the event, no photographs will be taken of you. If you object to processing after the event has taken place, digital content will be removed. However, we are unable to remove content from existing 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 is processed using our Microsoft Office 365. Data is stored within the UK.

When we ask you to answer a survey we use Qualtrics who are based in the United States. This will involve transferring your data outside the UK. . We have implemented safeguards prescribed by the UK GDPR when transferring data to a third country including contracts approved by the ICO (standard contractual clauses together with the ICO's International Data Transfer Addendum) giving the data transferred a similar level of protection as it has in the UK.

For further information please see the following:

Microsoft: [Data Protection Addendum](#)

Qualtrics: [Standard Contractual Clauses](#)

How long your personal data will be kept

- Where you have supplied your first name, last name, date of birth, and postcode and have not withdrawn or denied permission for your data to be included in research, your record will not be retained for longer than 15 years from: a) the year in which you might be expected to enter Higher Education, the date your record was created, or when you last interacted with the member, whichever of these conditions is most recent
- **Incomplete Records** Where your personal data is considered incomplete, i.e., the following has not been captured: a) any or all of your first name, last name, date of birth, postcode b) and/or your permission for inclusion in tracking research, it will be considered expired after 7 years from the date the record was created and will be flagged for deletion, except where you have 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 in accordance with your consent form. After 4 years, photographs and videos will be archived.

- The Outreach and Widening Participation Department and the HEAT Service 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). A 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:

- 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

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

Document review date

This privacy notice will be reviewed at least annually.

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