

# PRIVACY NOTICE 2022-23

## Who are we?

Known locally as Inspiring Choices, we are a partnership between Askham Bryan College, Craven College, CU Scarborough, Luminare Education Group, TEC Partnership, Selby College, the University of York, York College, York St John University, City of York Council, North Yorkshire County Council, NYBEP, York Cares, North Yorkshire Coast Opportunity Area, NCS Trust Ltd, York & North Yorkshire Local Enterprise Partnership, and The Brilliant Club. The function of the partnership is the delivery of the Uni Connect programme, a national programme funded by the Office for Students (OfS), set up in 2017 to support the government's social mobility goals to rapidly increase the number of young people from underrepresented groups going into higher education.

Inspiring Choice's work will focus on providing events and activities in areas where progression of young people to higher education (HE) is low, despite relatively high GCSE results when compared to other areas of low participation. Activities can include mentoring, residential trips and university visits, for example.

## Who is the Data Controller?

The lead institution for Inspiring Choices is York St John University, which acts as the data controller. All personal data gathered for this project is treated with the care and confidentiality required by the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## What information do we collect?

When you take part in the Inspiring Choices programme activities, we require some personal information. The collection of this information is necessary for the performance of a task carried out in the public interest, as detailed in our Data Sharing Agreement with your school or college. We use this information to provide evidence of your attendance to our funding body, and to monitor the impact of Inspiring Choices.

This information includes:

- Personal information including your name, postcode and date of birth
- Personal characteristics including gender, ethnicity, disability and/or health
- Whether your immediate family have been to university
- Whether your parent(s) have served in the Armed Forces
- Whether you have ever been in care or consider yourself as a young carer
- Attainment-related information such as predicted grades and exam outcomes
- Pupil Premium and Free School Meal status

## When do we share personal data?

Accurate tracking of all learners engaged in the Uni Connect programme is a condition of funding set by the Office for Students, therefore we may share your data with third parties, such as tutoring providers, for example. We require third parties to respect the security of your data and to treat it in accordance with the law. Your data will not be transferred, stored or processed outside of the UK.

We will share the personal information we collect and process with the Office for Students, and Department for Education (who fund our activities), members of the Inspiring Choices partnership (listed above) and companies or organisations providing specific services to or on behalf of Inspiring Choices:

- HEAT (Higher Education Access Tracker) secure database. We use this database in order to keep a record about your participation in the project, including details of your engagement with individual Inspiring Choices activities and HE progression data (further study post-18)
- Glasscubes (Inspiring Choices use this service to securely transfer data)

We may also share your data with one or more of the following receiving organisations:

- The schools and colleges that the learners we work with attend
- The Local Authorities of the schools and colleges that the learners we work with attend
- Third party activity providers working in association with Inspiring Choices
- The national evaluators of our programme, CFE Research

**Please turn over**

## What legal basis do we have for processing your personal data?

The GDPR requires us to establish a legal basis for processing personal data. For the purpose of this privacy notice the processing is covered under GDPR Article 6 (1)(e) where processing is necessary for the performance of a task carried out in the public interest.

Where special category data is processed, the processing is covered under GDPR Article 9 (2) (g) where processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, and Schedule 1, Part 2 (8) of the Data Protection Act 2018 where processing is necessary for the purposes of identifying the existence or absence of equality of opportunity or treatment between groups of people specified in relation to race, ethnicity and health with a view to enabling such equality to be promoted or maintained.

## What rights do you have in relation to your data?

You have the following rights regarding your personal data which is processed under the lawful basis of public task:

- You have the right of access to your data
- You have the right to correct your data if it is incorrect
- You have the right to ask for a copy of your data to be transferred to another organisation

If you wish to exercise your rights, please contact York St John University at [gov.compliance@yorks.ac.uk](mailto:gov.compliance@yorks.ac.uk), quoting “Inspiring Choices Uni Connect” in the email.

## How long do we keep your personal data for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We are required by the Office for Students to use an approved tracking service, Inspiring Choices uses the HEAT database.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once we no longer need the personal data we have collected or have reached the date of deletion it will be securely destroyed in accordance with the York St John University Records Retention Schedule.

The HEAT Database retention schedule is as follows:

If you are under 21 years old at the time of first outreach activity:

- Your data will be retained for 15 years after graduation or until 30 years of age (whichever comes first).

If you are over 21 years old at the time of first outreach activity:

- Your data will be retained for 15 years after graduation or for 10 years after your first outreach activity (whichever comes first).

After this time, data will be anonymised in bulk at the beginning of the next academic year.

## How to contact us

If you would like to find out more about the programme or the uses of your personal data, please contact us at [InspiringChoices@yorks.ac.uk](mailto:InspiringChoices@yorks.ac.uk).

For enquiries about Subject Access Requests or if you have a Data Protection query or complaint, please contact The University's Data Protection Officer: Pro-Vice Chancellor: Governance & Student Life, York St John University, Lord Mayor's Walk, York, YO31 7EX. Tel: 01904 876844 Email: [eso@yorks.ac.uk](mailto:eso@yorks.ac.uk).

## Please note

You also have the right to lodge a complaint about the processing of your personal data with the Information Commissioner's Office. Contact details for the ICO can be found at [www.ico.org.uk](http://www.ico.org.uk).