

## How your information is used and who uses it

(From <https://www.hesa.ac.uk/innovation/outcomes/students>)

Purpose 1 - Your survey responses will be provided to your higher education provider

Your responses will be received by your HE provider who will only use the information for research and statistical purposes to help them improve the outcomes from their courses unless you give your permission for other uses via the survey.

Your HE provider will use your survey answers to research the outcomes of different courses and the effectiveness of career services. This research is used by HE providers to improve courses and services and to promote them to current and prospective students.

HE providers will receive regularly updated information from survey responses during the survey period. This includes coded information on industries and occupations of employed graduates. This information may only be processed for the purpose of monitoring the progress of the Graduate Outcomes Survey.

The survey asks if you are happy to be contacted by your HE provider in relation to your survey answers. If you answer 'No' then your provider may only use your survey answers for research and statistical purposes and they won't need to contact you with further privacy information.

If you answer 'Yes' then your provider may contact you, in relation to any of the information you give in the survey. No new contact details are given to HE providers so if they do contact you they will use the contact information they already held before the survey. To update the contact details held by your provider please contact them directly.

Your HE provider will be a Controller of your information and will need to determine its own legal grounds for contacting you. If your provider does contact you they must give you further privacy information about how they will use your personal data. Contact from your provider might include marketing or fund-raising campaigns and your provider must give you opportunities to opt out of future contact if you change your mind.

Legal basis for processing your information for Purpose 1 – these cover use of personal data by both HESA and higher education providers.

Processing of your information for Purpose 1 is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in



the Controller (see GDPR Article 6(1)(e)) and for statistical and research purposes (see GDPR Article 89).

Processing may also be necessary for the purposes of the legitimate interests pursued by your higher education provider except where such interests are overridden by your interests or fundamental rights and freedoms (see GDPR Article 6(1)(f))

Processing of Special Categories of data is necessary for statistical and research purposes in accordance with Article 89(1) based on the duties in the Equality Act 2010, Section 75 of the Northern Ireland Act 1998, or the Digital Economy Act 2017 (see GDPR Article 9(2)(j))

Purpose 2 - Your responses are used by the HE funding and regulatory bodies who require HESA and your HE provider to undertake this survey.

Your survey responses are linked to data about when you were a student and these collectively make up "your HESA information". This information is used by HE funding and regulatory bodies who have used a legal or regulatory power to require your HE provider and/or HESA to undertake the survey and provide information to them. These bodies use the information to understand the outcomes from higher education and for their statutory and/or public functions including funding, regulation and policy-making purposes. Your individual answers won't be used to make decisions about you.

Your survey answers will be linked to information held about you as a student, including information you gave when you enrolled, and details of the qualification you gained. More information about your HESA Student record can be found in the HESA Student Collection Notice. This information is shared by HESA with the HE funding and regulatory bodies who commissioned the survey and who have the power to collect information from HEPs. These bodies include:

- England - Office for Students
- Wales - Higher Education Funding Council for Wales
- Scotland - Scottish Further and Higher Education Funding Council
- Northern Ireland - Department for the Economy

Your HESA information will be shared with these organisations as part of a large dataset which contains similar information about other people who have followed higher education courses in the UK. These organisations are also Controllers of your HESA information. This means that they make their own decisions about how to use it, and this may include publishing statistics and sharing the information with third parties, such as other government or public bodies or other organisations of the type listed elsewhere in this collection notice. However, all uses of your HESA information will be within the purposes set out in this collection notice and covered by data sharing agreements with HESA. These organisations will not use the data for the

purposes of identifying you as an individual or to take decisions about you. These organisations may retain HESA information indefinitely for statistical and research purposes.

All uses of HESA information must comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Legal basis for processing your information for Purpose 2 – these cover use of personal data by both HESA and public authority data controllers.

Processing of your HESA information for Purpose 2 is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller (see GDPR Article 6(1)(e)) and for statistical and research purposes (see GDPR Article 89).

Processing may also be necessary for compliance with a legal obligation to which the controller may be subject (see GDPR Article 6(1)(c))

Processing of Special Categories of data is necessary for statistical and research purposes in accordance with Article 89(1) based on the duties in the Equality Act 2010, Section 75 of the Northern Ireland Act 1998, or the Digital Economy Act 2017 (see GDPR Article 9(2)(j))

### Purpose 3 - Public authorities carrying out their public functions

HESA acts as an information hub to provide data and statistics on higher education. While the bodies described in Purpose 2 (above) have legal or regulatory power to require information from certain HE providers, other public authorities also use your HESA information for their statutory and/or public functions including funding, regulation and policy-making purposes. Your survey responses will not be used to make decisions about you.

### Education statistics and data

Outside of its Designated Data Body activities HESA also acts as an information hub to provide information on higher education. HESA shares your HESA information with public authorities who require it to carry out their statutory and/or public functions. This data sharing is carried out in the public interest or in the exercise of official authority vested in HESA and the public authorities. Your HESA information will be shared with these organisations as part of a large dataset which contains similar information about other people who have followed higher education courses in the UK.

These organisations are also Controllers of your HESA information. This means that they make their own decisions about how to use it, and this may include publishing statistics and sharing the information with third parties, such as other government

or public bodies or other organisations of the type listed elsewhere in this collection notice. However, all uses that they make of your HESA information will be within the purposes set out in this collection notice and covered by data sharing agreements with HESA. These organisations will not use the data for the purposes of identifying you as an individual or to take decisions about you. These organisations may retain HESA information indefinitely for statistical and research purposes, or for fixed terms depending on the terms of their data sharing agreements with HESA. Such organisations may include:

HE funding and regulatory bodies (in respect of information not collected under their relevant power – for example the Office for Students have power to collect information from English providers, but also need information from providers in other parts of the UK):

- Office for Students
- Higher Education Funding Council for Wales
- Scottish Further and Higher Education Funding Council
- Department for the Economy

Education departments in the devolved administrations:

- Department for Education
- Welsh Government
- Advanced Learning and Science directorate (Scottish Government)
- Department for Business, Energy and Industrial Strategy

Other bodies with public functions connected to education:

- UK Research and Innovation
- Education and Skills Funding Agency
- Teaching Regulation Agency
- National Health Service bodies and organisations working with them e.g. Health Education England
- General Medical Council
- Quality Assurance Agency for Higher Education

and any successor bodies. Further controllers may be added to the list from time to time – please see the online version of this notice at [www.graduateoutcomes.ac.uk/privacy](http://www.graduateoutcomes.ac.uk/privacy).

Other uses of named data

Your HESA information may also be used by some organisations who are also Controllers who carry out statistical and research tasks in the public interest or in the exercise of official authority that are not connected with education. Such uses may include the following:

- Production of statistics in relation to the population of the UK and for statistical research, undertaken by the Office for National Statistics. Further information can be found on the ONS website
- Production of statistics and statistical research undertaken by National Records of Scotland and the Northern Ireland Statistics and Research Agency
- Monitoring of public expenditure by the National Audit Office.

The above list of organisations who may receive your HESA information will be subject to change over time. For example, HESA is seeking to reduce the burden on higher education providers by encouraging other organisations who currently collect information about students direct from higher education providers to collect and receive information through HESA. The above list will be updated on the Graduate Outcomes website [www.graduateoutcomes.ac.uk/privacy](http://www.graduateoutcomes.ac.uk/privacy) from time to time, and you will need to monitor this link yourself if you wish to be aware of changes.

Legal basis for processing your information for Purpose 3 - these cover use of personal data by both HESA and public authority data controllers.

Processing of your HESA information for Purpose 3 is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller (see GDPR Article 6(1)(e)) and for statistical and research purposes (see GDPR Article 89).

Processing may also be necessary for compliance with a legal obligation to which the controller may be subject (see GDPR Article 6(1)(c))

Processing of Special Categories of data is necessary for statistical and research purposes in accordance with Article 89(1) based on the duties in the Equality Act 2010, Section 75 of the Northern Ireland Act 1998, or the Digital Economy Act 2017 (see GDPR Article 9(2)(j))

#### Purpose 4 - Published statistics

HESA, your HE provider, and some of the public authorities listed in Purposes 2 and 3 publish statistics about the outcomes of higher education.

Part of HESA's role is to produce and publish information about higher education in the public interest. This includes some National Statistics publications ([www.statisticsauthority.gov.uk/national-statistician/types-of-official-statistics](http://www.statisticsauthority.gov.uk/national-statistician/types-of-official-statistics)) and online business intelligence and research services.

Graduate Outcomes statistics will also be published by some of the public authorities listed in Purposes 2 and 3, for example to provide employment statistics to help prospective students choose which courses to study.

When producing this material for publication, HESA applies its disclosure control, the HESA Standard Rounding Methodology, to ensure that no Personal Data is included and that individuals cannot be identified from published material.

Processing within this Purpose 4 may also be carried out by HESA Services Limited, HESA's wholly-owned subsidiary company.

Legal basis for processing your information for Purpose 4 - these cover use of personal data by both HESA and public authority data controllers.

Processing of your HESA information for Purpose 4 is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller (see GDPR Article 6(1)(e)) and for statistical and research purposes (see GDPR Article 89).

Processing of Special Categories of personal data is necessary for statistical and research purposes in accordance with Article 89(1) based on the Equality Act 2010 and Section 75 of the Northern Ireland Act 1998 (see GDPR Article 9(2)(j))

Purpose 5 - Equal opportunity, research, journalism and other processing for statistical and research purposes

HESA information is used for research into higher education and the student population. This research can be academic, commercial, journalistic or for personal reasons. HESA prohibits the identification of individual students by those carrying out this research and information is not shared on a named basis.

HESA and the other Controllers (see Purposes 2 and 3) may also supply information to third parties where there is a legitimate interest in doing so for statistical and research purposes. Examples of use for this purpose include:

- Provision of information to students and prospective students
- Equal opportunities monitoring
- Research - this may be academic research, commercial research or other statistical research where this is in the public interest
- Journalism - where the relevant publication would be in the public interest e.g. league tables

Users to whom information may be supplied for Purpose 5 include:

- Higher education sector bodies
- Higher education providers
- Academic researchers and students
- Commercial organisations (e.g. recruitment firms, housing providers, graduate employers)
- Unions
- Non-governmental organisations and charities

- Local, regional and national government bodies
- Journalists

Information supplied by HESA to third parties within Purpose 5 is supplied under contracts which require that individuals shall not be identified from the supplied information and this means that they also cannot use it to take decisions about you. A copy of HESA's current agreement for the supply of information is available at [www.hesa.ac.uk/services/custom/data/timescales-costs](http://www.hesa.ac.uk/services/custom/data/timescales-costs). Each agreement specifies the duration for which data may be processed. This is usually one year but may be longer if necessary for the specific research purpose. Each request for HESA information under Purpose 5 is assessed for its compliance with data protection legislation and its compatibility with this Collection Notice.

HESA ensures that only the minimum amount of HESA information necessary for the specified research purpose is supplied to users. If the supplied information is to be published, HESA's Rounding Methodology or an equivalent disclosure control must be applied to ensure that individuals cannot be identified from the published material and it does not constitute Personal Data.

HESA student information may be linked to school and/or further education college information and supplied to researchers. A copy of the Agreement for the supply of linked data about pupils from schools in England is available at [www.gov.uk/government/collections/national-pupil-database](http://www.gov.uk/government/collections/national-pupil-database).

Processing within this Purpose 5 is carried out by HESA and by HESA Services Limited, HESA's wholly-owned subsidiary company. Other controllers (listed under Purpose 2 and 3 above) may also process data for this purpose where this is necessary to fulfil their public functions.

Legal basis for processing your information for Purpose 5 - these cover use of personal data by both HESA and third party recipients of data for statistical and research purposes.

Processing of your HESA information for Purpose 5 is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller (see GDPR Article 6(1)(e)).

Processing may also be necessary for the purposes of the legitimate interests of HESA in disseminating higher education information, or the legitimate interests of third parties in undertaking research in the field of higher education (see GDPR Article 6(1)(f)).

In either case processing of your HESA information is necessary for statistical and research purposes in accordance with GDPR Article 89(1).

Processing of Special Categories of personal data is necessary for statistical and research purposes in accordance with Article 89(1) based on the duties in the Equality Act 2010 and Section 75 of the Northern Ireland Act 1998 (see GDPR Article 9(2)(j))

How is my HESA information linked to other information?

HESA information is sometimes linked to other data sources to enable more detailed research and analysis.

As indicated above, where HESA and organisations covered by Purpose 2 and 3 use HESA information this may include linking named or pseudonymised HESA information to other information for research purposes. Examples include linking to:

- National Student Survey data – to place the results of this survey in context
- School and Further Education data – to research progression to higher education and employment
- Student Loans Company data – to research the use of student finance
- Qualification awarding bodies data – to research the value and outcomes of qualifications
- Employment, tax, and benefits data – to research the earnings of graduates and to better understand the outcomes of education (guidance on the use of HESA records matched to tax, benefits and employment data is available at: [www.gov.uk/government/publications/longitudinal-education-outcomes-study-how-we-use-and-share-data](http://www.gov.uk/government/publications/longitudinal-education-outcomes-study-how-we-use-and-share-data))
- UCAS data – to research the full higher education process from applications to outcomes.
- If you are a medical student, your HESA information may be included in the UKMED research database ([www.ukmed.ac.uk](http://www.ukmed.ac.uk)). The General Medical Council is the controller for this database used for researching doctors' progression through their education and training.

Where HESA provides information from your HESA information to third parties under Purpose 5, the permitted uses of the information by a third party may include linking HESA information to other information held by the third party. Permission for such use is considered on a case by case basis. It is only given where the linking is for the purposes outlined in Purpose 5 and subject to the requirement not to carry out linking to identify individuals.