

Privacy Notice – Participants on pre-university or undergraduate events or initiatives 2023

The aim of this Privacy Notice

This Privacy Notice explains how we use your personal information: for participants (or prospective participants) on pre-university or undergraduate events and initiatives. It outlines the types of data that we hold and how we use it. We aim to be clear when we collect your personal information, and not do anything you would not reasonably expect. In collecting and using (processing) your personal information we must comply with the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018.

1. What is personal data (also known as personal information)?

‘Personal information’ means any information which relates to or identifies you as an individual (e.g. name, date of birth, postcode etc.) and includes information which may not explicitly identify you (e.g. where your name has been removed) but which nevertheless does identify you if it is combined with other information that is readily available.

2. Who will process my personal information?

The information provided here applies to the use, sharing and disclosure (processing) of your personal information by The University of Manchester for the purpose of pre-university or undergraduate events or initiatives. Further information about who your information will be shared with is included in Section 4. According to data protection law the University is a Data Controller for this processing.

3. What personal information will you process?

The University needs to collect, maintain, and use personal data relating to or about you in order to administer the pre-university or undergraduate events and initiatives you are involved with. This includes:

- 3.1. Personal contact details such as name, title, and home address, telephone numbers, and personal email addresses
- 3.2. Date of birth
- 3.3. Gender
- 3.4. Details about your current studies, school and academic/study interests
- 3.5. For some initiatives that have eligibility requirement information about parent/legal guardian educational background and household income will be collected and maintained
- 3.6. Next of kin and emergency contact information where you are attending an event and are under 18
- 3.7. If you involved in or make an application to an initiative where information is shared with HEAT (see section 9) details of your applications and engagement with Higher Education will be available to University of Manchester staff involved in pre-admission and widening participation activity.

4. What is the purpose of the processing under data protection law?

As part of our work, we process personal information relating to participants (or prospective participants) on pre-university events and initiatives to offer support and to encourage wider

participation in higher education amongst underrepresented groups. We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition.

Your personal information will be processed by the University (including its Departments and Faculties) where it is:

- necessary for the performance of our contractual obligations with you. To manage your student experience and welfare while you study or take part in an access programme at the University of Manchester.
- necessary for the performance of tasks we carry out in the public interest (e.g. supporting access to education and research)
- necessary for the pursuit of the legitimate interests of the University or an external organisation (e.g., to enable your access to external services)
- necessary for compliance with a legal obligation
- necessary for the pursuit of the legitimate interests of the University or an external organisation (e.g., to enable your access to external services)

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's interests)

We will seek your consent to send you additional promotional information about applying to study at Manchester and you can choose to change your preferences at any time.

5. Can you provide examples of the processing?

The personal information that you provide to us when you make an application, register an interest in, or sign up for, or otherwise engage with, pre-undergraduate admissions events/activities/updates will be processed for a range of purposes connected with widening participation in higher education, including the purposes of:

5.1. enabling your participation in events or programmes

5.2. delivering facilities or services to you for example IT provision, library access

5.3. enabling us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us)

5.4. tracking future outcomes of event participants, including whether they participate in other pre- or on course university events or programmes run or held in conjunction with the University, or make an application to a Higher Education institution.

5.5. monitoring and research including (but not limited to) evaluation of the impact of events/activities (including events not organised by the University)

5.6. producing statistics, including event application and participation numbers, and participant outcome.

5.7. to communicate effectively with you by post, email and phone, including the distribution of relevant newsletters and circulars containing information the University considers necessary to support your experience as a participant/prospective student. Where appropriate you will be given the opportunity to opt-out of receiving some communications from us

6. What constitutes “Special Category Data”?

The University will also process some information about you that is considered more sensitive and this is referred to as 'special category' personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK this also includes any personal information relating to criminal convictions and offences.

7. How will you process my Special Category personal information?

We will only process special category personal information in certain situations in accordance with the law. For example, we can do so if we have your explicit consent and, in some circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do, we will provide you with full details for the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent, which you can withdraw at any time.

We do not need your consent to process special category personal data when we are processing it for the following purposes as these satisfy another legal condition:

- where we need to carry out our legal obligations
- where you have made the data public
- where processing is necessary for the establishment, exercise or defence of legal claims
- where processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- where it is necessary to protect your vital interests or those of another person and where you/they are physically or legally incapable of giving consent. This would be in an emergency situation where your health, wellbeing or welfare was at risk

Where we have your consent, we will use your special category personal information in the following ways:

7.1. your race, national or ethnic origin, religious, philosophical, or moral beliefs or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting (including where for monitoring purposes conducted by the Higher Education Statistics Agency HESA).

7.2. information about your ethnicity or your physical health or mental health or disability status where you choose to provide these details to us in order to request that reasonable adjustments are put in place to help you attend an event or otherwise take part in an initiative or because this information forms part of the eligibility requirements of an initiative.

8. Who will my personal information be shared with?

In addition to sharing your personal information with relevant University of Manchester staff for the purposes of supporting the events or initiatives you are involved we will share your personal information for the above purposes as relevant and necessary with:

8.1. your school/college

8.2. partner(s) with whom we may have collaborated to organise and/or evaluate this event.

8.3. the Higher Education Access Tracker (HEAT)¹.

9. What is HEAT?

HEAT is a secure online database that monitors and evaluates outreach activities by higher education providers across the UK. Your data will be shared with the HEAT service and any contracted third party organisation that they use to run and manage their database. HEAT will be responsible for storing your data securely and adhering to all relevant data protection legislation. When your data is added to HEAT, it may be shared with the following public bodies for research and monitoring purposes only: Higher Education Statistics Agency (HESA), The Department for Education (DfE), The Joint Information Systems Committee (JISC), The Universities and Colleges Admissions Service (UCAS), Independent research by third parties and the Education and Skills Funding Agency. These bodies will share data with HEAT about your progression into education and employment which HEAT will share with The University of Manchester. We will be able to find out how you progress in your education after the event or activity you attended or applied to at the University. This will help us to assess whether our activities are meeting the aims of supporting young people with their progression to higher education. Your data will not be used in a way that would affect you individually.

Data will be shared with these third parties for the same purposes as listed above, and also for storage. Please note that only certain events/initiatives involve sharing your personal information with HEAT and related parties and you will be provided with details about this. We will not be sharing any 'special category' data with HEAT, however, where you have provided consent for us to process this data elsewhere, we may link this back to the progression data we obtain from HEAT in order to monitor and report on rates of HE progression and continuation by demographic type.

The University and third parties may publish aggregated data based on personal information from event applicants and/or participants, including analysis and research utilising these data, but the data will be anonymised and no information which could identify you will be published. You can find out more about HEAT on their website www.heat.ac.uk. HEAT may also share your data with the UK Higher Education Statistics Agency (see HESA's statement about the uses made by them of your personal statement²).

If you would like to opt out of sharing your data with HEAT, please email: heatoptout@manchester.ac.uk with your full name, date of birth and home postcode.

10. How long will my personal information be kept for?

If you apply to or attend any event/activity, we will only retain certain detailed information that we need for the purposes of event/activity administration for as long as necessary to serve that purpose. In order to conduct long-term evaluation, tracking and research about access to Higher Education, and in relation to certain events/initiatives only, we will retain some of your key personal information as follows:

- until the end of the academic year in which you reach the age of 30 (or, if you are a mature student, for 10 years from the point you provide it);

¹ <https://heat.ac.uk/privacy-notice/>

² <https://www.hesa.ac.uk/about/regulation/data-protection/notices#linkg>

- if you enter Higher Education within this time, until 15 years after you graduate.

After these periods, any personal information will be removed from our records, and only the anonymised data extract will be retained for secondary research purposes.

11. What are my rights in connection with my personal information?

Under certain circumstances, by law you have the right to:

11.1. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it

11.2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected

11.3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing

11.4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes

11.5. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it

11.6. Request the transfer of your personal information to another party. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you would like to exercise any of these rights, you should contact the University Data Protection Officer by email: dataprotection@manchester.ac.uk. Alternatively, you can write to The Information Governance Office, University of Manchester, Christie Building, Oxford Road, Manchester M13 9PL.

Further information about your rights is available from the University's data protection web pages.

12. Information for parents/guardians:

The details in this privacy notice apply to all children taking part in our pre-university events and initiatives. If your child is under the age of 13, you will be asked to provide their personal information on their behalf. You can choose to opt out of the sharing and processing of their data by

emailing: heatoptout@manchester.ac.uk. Once your child reaches the age of 13 they will be considered responsible for their own personal data.

13. Who can I contact?

If you have any questions about how your personal information is used, or wish to exercise any of your rights, please consult the University's data protection webpages at [<http://www.dataprotection.manchester.ac.uk/policiesandprocedures/>]. If you need further assistance, please contact the University's Data Protection Officer:

Information Governance Office

The University of Manchester

Oxford Road

Manchester

M13 9PL

dataprotection@manchester.ac.uk

+44 (0)161 306 2473 or +44 (0)161 275 811114. How do I complain?

If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>)

For more information about how we handle your personal information, and your rights under data protection legislation, please see the University's data protection web pages.

15. Future changes

From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices change at some time in the future, we will always post the policy changes on this page.