

Privacy Notice for the Sandwich Courses Research Project

1. Introduction

The Centre for Transforming Access and Student Outcomes in Higher Education (“TASO”) is the funder of the Sandwich Courses Research Project (“Project”) conducted by Nottingham Trent University (“NTU”) and the University of Surrey (“UoS”) (“we”, “us”, “our”). Together we are committed to protecting the privacy and security of the personal data we collect about research participants (“you/your”).

The purpose of this privacy notice is to explain what personal data we collect about you when we conduct research for the *Sandwich Courses Research Project*. When we do this, we are the data controller.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at dpo@theevidencequarter.com quoting “*Sandwich Courses Research Project*” or “#5674” in the subject or body of the email.

If you are a Student of NTU you are also able to find out more information about how the University processes your personal information by clicking [here](#).

If you are a Student of the UoS you are also able to find out more information about how the University processes your personal information by clicking [here](#).

2. Personal data we collect

We shall be processing the data of several categories of data subject: Volunteer Stakeholders from Higher Education Providers, Employers of companies which employ Sandwich Course students, and Sandwich Course Students, although the personal data we collect shall be the same, unless specified, as outlined below:

- Your name
- Your email address
- Your age
- Your gender
- Your job title
- Name of your employer
- Answers you provide within interviews and focus groups that will be recorded
- Answers you provide within the Surveys we shall send to you
- Widening Participation information (Students only):
 - Whether you have a disability
 - Whether you are from a lower income family
 - Whether you are from an ethnic minority
- Subject studied as a Higher Education level and whether or not you have undertaken a Sandwich Course (Students only)

3. How we collect information about you

We may collect personal data in a variety of ways and at a variety of times throughout the Project. We refer to “primary data collection” when data is collected directly from you and we refer to “secondary data collection” when the data is not collected directly from you.

- From yourself when you voluntarily respond to a invitation to participate in the Project (primary data collection)
- From the Higher Education Provider you are associated with, studying at, or participating with as an employer of Sandwich Course Students (Secondary Data Collection)
- From a reliable stakeholder in the sector and an individual known to you who has identified you to us as someone with information relevant to the Project (Secondary Data Collection)
- From yourself within an online/telephone interview or focus group you have attended (primary data collection)
- From yourself via an online survey we have sent you (primary data collection)

We are also collecting anonymous, publicly available data about students in Higher Education from the Higher Education Statistics Authority (HESA). For more information about how HESA processes your data you can visit their website privacy policy by clicking [here](#).

4. Purposes for which we use personal data and the legal basis

When conducting the research study, we may use your personal data for the following purposes and on the following lawful bases. The table below is relevant to all data subjects involved in the research study:

Purpose	Lawful Basis for Processing
1. To conduct research with the information you have provided us.	The lawful basis we shall be relying on is the legitimate interest of the Data Controller.
2. To request your ethical informed consent for participation in the research which may include participation in surveys, interviews and group sessions. [NOTE: Should you withdraw your consent we will only be able to remove your personal information we have collected up to one week after an interview has been conducted with you]	If you are a Student of NTU or UoS the lawful basis we shall be relying on is that the processing is necessary for the performance of a task carried out in the public interest.
3. For us to contact you to invite you to participate in an interview, focus group /	

<p>group meeting as a research participant within the project.</p> <p>[NOTE: You may be able to view other participants name and contact details within the group meeting]</p>	
<p>4. To transcribe the audio captured from any recorded interviews or group sessions you have participated in.</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller.</p> <p>If you are a Student of NTU or UoS the lawful basis we shall be relying on is that the processing is necessary for the performance of a task carried out in the public interest.</p>
<p>5. To identify your data and take relevant action should you submit a data subject rights request.</p>	<p>The lawful basis we shall be relying on is for the compliance with a legal obligation. The legal obligation is the UK General Data Protection Regulation to uphold your data protection rights.</p>
<p>6. The data we process includes special category data, specifically the ethnicity. This is because processing this special category data will help ensure our research is able to use demographic information for the outcome to be informative to such demographics.</p>	<p>The lawful basis we shall be relying on is that the processing is necessary for research purposes.</p>
<p>7. To provide you with an online voucher for your participation in an interview.</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller.</p>
<p>8. To inform you of the outcome of the Project.</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller.</p>
<p><u>University of Surrey only:</u></p>	
<p>9. To send you a survey for you to complete so we might gather more information on the research topic area from you.</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller.</p> <p>If you are a Student of UoS the lawful basis we shall be relying on is that the processing is necessary for the performance of a task carried out in the public interest.</p>

<p>10. To identify whether you have agreed (given informed consent) to participate in a survey.</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller.</p>
<p>11. To anonymise your data so it can be archived indefinitely and used for future research projects.</p> <p>[NOTE: Should you request your data to be deleted after the time it is anonymised we would not be able to identify your data.]</p>	<p>If you are a Student of UoS the lawful basis we shall be relying on is that the processing is necessary for the performance of a task carried out in the public interest.</p>

5. Sharing your data

There is no data processed outside the UK or European Economic area for this Project. If, however, it becomes necessary for the purposes of conducting our research we will only share it with organisations in countries benefiting from a UK or European Commission adequacy decision, or on the basis of International Data transfer Agreements, European Commission Standard Contractual Clauses with a UK required addendum (both of which are recognised by the UK) which contractually obliged the recipient to process and protect your personal data to the standard expected within the UK.

Any data shared with the below categories of recipients is the minimum necessary for the task they have been instructed to carry out on our behalf or in conjunction with us. Each category of recipient is subject to pre-approved review to ensure comparative technical and organisational measure for keeping the data secure.

1. Online communications and digital service providers
2. Pre-approved transcription vendors.
3. Pre-approved online survey platform providers.

Data collected by a university is not shared with other universities or with TASO.

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies, regulatory bodies or public authorities in order to prevent or detect crime. We will only ever disclose your personal data to these third parties to the extent we are required to do so by law.

We may also share your personal data if we choose to sell, transfer, or merge parts of our business and/or group, or our assets in the future. Or we may seek to acquire other businesses or merge with them. During any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private. If a change to our group happens, then other parties may use your data in the same way as set out in this notice.

6. How long we keep your data

Data shall be reduced, redacted, de-identified and deleted at appropriate times so we retain the minimum amount of data possible throughout the research study. We shall keep the

personal information we have collected for a minimum of 6 years after the end of the Project which is in line with NTU and UoS internal data retention policies for any research being conducted. We will then dispose of your name and contact details by securely deleting your data.

Transcription vendors are instructed to confirm deletion of interview recordings and any copies of transcriptions of interviews within 7 days of delivery of the transcription.

Archived data within the University of Surrey Data Archive shall be anonymous data and retained indefinitely.

7. How we protect your data

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction. Data protection assessments are conducted for each research project and for all recipients of data used within any research data.

All electronic data will be stored on secure password-protected secure servers, which are backed up regularly. Because all the interviews will be conducted online, and recorded via Microsoft Teams, there will be no need to use separate audio files.

Data shared internally between researchers (yet remain within NTU or UoS depending on which university collected the data) that is of a sensitive nature is fully anonymised prior to sharing.

Participants are able to withdraw from the Project up to one week after the interview. After that point, the data will not be possible to withdraw although any identifying information will be minimised or removed completely if this is possible and does not detrimentally affect the Project.

We will always keep these under review to make sure that the measures we have implemented remain appropriate.

Any personal data is not subject to any automated decision-making.

8. Your rights and options

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal information because it is in our legitimate interests to do so, you can object to us using it this way.
- We are not using your personal data for any direct marketing, including profiling for direct marketing purposes. Were this happening you would have the right to object to us doing so.
- You can ask us to restrict the use of your personal data if:
 - It is not accurate,
 - It has been used unlawfully but you do not want us to delete it,

- o We do not need it any-more, but you want us to keep it for use in legal claims, or
- o if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to erase your personal data and request a machine-readable copy of your personal data to transfer to another service provider.
- There is no automated decision making using your personal data within this Project. Were this happening you would have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

You will not have to pay a fee to access your personal data (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.

If you wish to exercise your rights, please contact us at dpo@theevidencequarter.com.

How to Complain

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://ico.org.uk/concerns/>.

Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact TASO as the first point of contact:

Project: #5674 - Sandwich Courses Project
Organisation: The Centre for Transforming Access and Student Outcomes in Higher Education (TASO),
Address: TASO, Evidence Quarter, 4th Floor, Albany House, Petty France, London, SW1H 9EA
Email: dpo@theevidencequarter.com

Other Contacts:

If you wish to contact NTU you can email: DPO@ntu.ac.uk
If you wish to contact UoS you can email: dataprotection@surrey.ac.uk

Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify you of the changes where required by applicable law to do so.

Last modified 22 November 2022.