

# Privacy Notice for the 'Pathways through Higher Education for Young People' Project

## 1. Introduction

The Rees Centre, University of Oxford<sup>1</sup> ("TRC") and its affiliates, subsidiaries, and related entities ("TRC", "we", "our") is committed to protecting the privacy and security of the personal data we collect about data subjects ("you/your").

The Pathways through Higher Education for Young People project ("Project") is a collaboration between TRC, What Works in Children's Social Care ("WWCSC") and Transforming Access and Student Outcomes in Higher Education ("TASO"). Together, these parties are referred to as the 'Research Team' in this Privacy Notice.

The purpose of this privacy notice is to explain what personal data we process about you during the 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 [data.protection@admin.ox.ac.uk](mailto:data.protection@admin.ox.ac.uk) quoting "Pathways through Higher Education for Young People" in the subject or body of the email.

## 2. Personal data we process

The following categories of data will be of data subjects who are around 22 years old now, but the personal data was collected when these data subjects were children:

- Your age
- Your Gender
- Your ethnicity
- Your status regarding being a Child in Need, on a Child Protection Plan or whether you have a Child Looked After status and further details associated with that (e.g. reason for CLA, CIN, CPP; length of time designated as CIN, CLA, with CPP)
- Disability
- Financial data relating to benefit status and education funding or support
- Information on school placement(s), school attendance & punctuality, eligibility for free school meals, any exclusions, and your academic achievement(s)
- Educational background
- Employment status

## 3. How we access information about you

We will be requesting that data be uploaded to the Office for National Statistics (ONS) Secure Research Service (SRS) Database for us to be able to access the data outlined

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<sup>1</sup> The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford

above. The request is sent to the UK Department for Education who are responsible for providing the data into the secure access location in the SRS.

This data is anonymous to us as we will have no ability to identify anyone from the data, we have access to in the SRS. The ONS, for their purposes of curating the data in the SRS consider the data to be pseudonymised data because the ONS may have the ability to re-identify you from the data they could get access to but do not hold. The Research Team will never know how to access the data that could be used to re-identify you from the ONS “pseudonymous data”.

Despite the strong security parameters in place for data access to data in the SRS, the nature of the project could mean there could be very rare exceptions where we may be able to identify you. These exceptions would only be where there is a very rare set of circumstances, which we term a ‘pathway’, that have led you to further and higher education. To be clear, it is extremely rare that out of the volume of de-identified data we are reviewing that we could isolate any one individual, not only due to secure access parameters but that someone in our research team would need access to further information which they are not privileged to access.

We understand that rare circumstances are possible and should you feel this would be of risk to you, you can request to be removed from the project so we can remove you from our analysis. You can make this request by emailing: [data.protection@admin.ox.ac.uk](mailto:data.protection@admin.ox.ac.uk)

#### **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:

| <b>4.1 Purpose</b>   | <b>4.2 Lawful Basis for Processing</b>  |
|--|---|
| Analyse pseudonymised data for the purposes of the project.                  | Processing is necessary for the performance of a task carried out in the public interest as defined by the UK Department of Education.                |
| Matching pseudonymised data within 5 datasets to compare against each other. | The processing of this data is for societal benefit and designed to inform social reforms and local and central governmental policy making decisions. |

#### **5. Sharing your data**

Will never share your data outside the United Kingdom. The data the Research Team has access to will remain within the Office for National Statistics (ONS) Secure Research Service (SRS) at all times. Only ONS accredited researchers are able to access the data and only the specific data related to the project will be made available.

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.

- Archiving location within the Office of National Statistics (“ONS”) ‘Secure Research Service’

The anonymised research data shall be transferred to our secure data archive. This archive is also hosted and stored by the Office of National Statistics (“ONS”) ‘Secure Research Service’ on WWCS’s behalf. WWCS is the data controller and access to any data stored within the archive is controlled by the ONS and WWCS only. The duration of retention is indefinite. Further information on how the ONS SRS keep data secure can be found by following this [link](#).

## 6. How long we keep your data

We will only have access to your data within the ONS Secure Research Service database for the duration of the project. At the end of the project access to your data will be revoked and the anonymised results data will be moved to the WWCS Data Archive database indefinitely. The delivery of the final report is scheduled for August 2022 although there is a possibility this will be extended yet the access to the data will still be revoked at the point of project completion.

The ability to re-identify a data subject from the pseudonymised data will remain with the UK Department for Education (DfE) and no other party will be privy to this information that would allow for re-identification. Therefore, the data is anonymous to anyone other than the DfE.

## 7. How we protect your data

Your data is only accessed by ONS Accredited researchers who have also been trained in data protection legislation. The ONS uses their “5 Safes” methodology to maintain the security of your personal data:

1. **Safe people:** researchers must apply to access the information in the WWCS Data Archive and must have relevant academic qualifications or work experience. If their application is successful, researchers will be trained by the ONS in how to use the data in the SRS and they must pass an assessment. Once a researcher is accredited, the ONS will continue to monitor how they use data in the SRS.
2. **Safe projects:** the ONS places restrictions on how the data in the WWCS Data Archive can be used. First, WWCS must give its support to each research proposal and the researcher must be able to demonstrate that their research will serve the public good in one of the ways defined by the ONS. Secondly, all proposals must be supported by a recognised ethics panel. Thirdly, all proposals will be assessed by the ONS’s independent Research Accreditation Panel.
3. **Safe settings:** researchers cannot move data in or out of the SRS. The ONS uses a combination of secure technology, physical security measures, and extensive procedures and protocols to protect the data when it is being used. For example, researchers are unable to access the internet and only approved software can be used. The ONS also uses protective monitoring software, including recording every keystroke made by the researcher.

4. Safe data: researchers can only use data that have been de-identified, so they will not be able to identify data subjects.
5. Safe output: once a researcher has completed their project, two members of staff in the ONS's Research Services and Data Access team independently review the research to ensure that data subjects' privacy and confidentiality is safeguarded. All research must be published.

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.
- Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can 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,
  - We do not need it any-more, but you want us to keep it for use in legal claims, or
  - 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.
- You 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 [data.protection@admin.ox.ac.uk](mailto:data.protection@admin.ox.ac.uk)

## 9. 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/>.

## 10. Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact:

Project: Pathways through HE for YP  
Organisation: Priya Tah % The Rees Centre  
Address: Department of Education, University of Oxford, 15 Norham Gardens OX2 6PY

Alternatively, you can email us at [data.protection@admin.ox.ac.uk](mailto:data.protection@admin.ox.ac.uk)

## 11. 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 27 June 2022 .