

LINCHIGHER PRIVACY POLICY

1. Introduction and General Terms

- 1.1 LiNCHigher is a targeted outreach programme. We are tasked by the Office for Students (OfS) to increase the number of under-represented learners going into higher education. LiNCHigher consists of universities, colleges and organisations involved in the education of young people in Lincolnshire. A full list of consortia partners can be found here: www.thefuturefocus.co.uk/about/our-partners/
- 1.2 This privacy policy explains how and why we collect and use your personal information when you take part in any of our activities, request services from LiNCHigher or visit our website.
- 1.3 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.
- 1.4 This Policy applies to:
- Pupils and adults who participate in LiNCHigher funded activities.
 - Pupils whose families are members of, or themselves are members of, community groups who participate in LiNCHigher activities such as, but not limited to, the Lincolnshire Traveller Initiative, Armed Forces, or Children in Care support organisations.
 - Teachers or advisers who take part in LiNCHigher activities.
 - Parents or carers who represent young people regarding LiNCHigher activities, or parents/carers who take part in activities themselves.
 - Anyone who visits our website.
- 1.5 LiNCHigher is the ‘Data Controller’ of the personal data we hold about you. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy policy. We may update this Policy at any time.
- 1.6 LiNCHigher is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act 2018 and GDPR (these laws are referred to collectively in this Policy as the “data protection laws”).
- 1.7 It is important that you read this Policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. The information we collect

2.1 How LiNCHigher gather and process personal data

- LiNCHigher has data sharing agreements in place with many educational establishments (schools and colleges) and community groups across Lincolnshire, that allow those establishments to collect personal data from pupils, young people and adults, for LiNCHigher purposes, and share it securely with us. This is carried out after your educational establishment or representative organisation i.e., community group have completed a form confirming they wish to include your participation in LiNCHigher activities.
- Sometimes, LiNCHigher will collect data directly from you, such as if you are a pupil taking part in activities where our staff or delivery agents deliver those activities, an online webinar or event, or if you self-register on our website.
- Sometimes, LiNCHigher will collect personal data from other organisations who work with pupils from vulnerable or minority groups, such as Lincolnshire County Council (Children's Services), Caring2Learn, the Lincolnshire Traveller Initiative (LTI) and local organisations helping Service Families.
- LiNCHigher work closely with other organisations, including The Higher Education Access Tracker (HEAT). The data collected for LiNCHigher purposes, is shared securely with HEAT provided by the University of Kent and added to their central database (this is a condition of our funding). This allows the impact of LiNCHigher activities on participants to be monitored in terms of widening participation for under-represented groups within education and future employment outcomes. The database is used to track the education journey of the learners we work with, and to use as a tool to evaluate our work. LiNCHigher are required to comply with the data protection policies put in place by HEAT.
- The full HEAT privacy policy can be found here: <https://heat.ac.uk/privacy-notice/>
- Sometimes, LiNCHigher may appoint third party companies to help us deliver LiNCHigher activities such as specific events or to help with evaluation of those activities – you may be asked to complete a form.
- You may contact us directly about the LiNCHigher programme, such as by telephone, email or via our website.

3. Safeguarding your personal data (including sharing)

- 3.1 We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.
- 3.2 We may share the personal information we collect and process with one or more of the following receiving organisations:
- The Office for Students (OfS), and Department for Education (DfE) who fund our activities.
 - Our partner universities and colleges.
 - 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 LiNCHigher.
- The national evaluators of our programme, CFE Research.
- Third party evaluators of our programme including the Humber Outreach Programme.
- Companies or organisations providing specific services to or on behalf of LiNCHigher, including but not limited to: Cosmos Engagement Ltd and HEAT, for tracking engagement.

3.3 Data is shared securely with appropriate agreements and safeguards in place to protect personal data. You will be given additional privacy notice information at the point of data collection, such as on a form. We will tell you more about any third parties we may share it with and why. Educational establishments are also required to give participants privacy information.

3.4 Data that may be published by LiNCHigher or receiving organisations – such as in reports - will be anonymised or aggregated so that no person can be identified from it.

3.5 Personal data will not be shared by LiNCHigher with other third-party organisations (who are not routine sharing partners) covered by relevant agreements, unless that sharing is required by law, such as for the prevention or detection of crime, apprehension or prosecution of offenders, or for purposes related to safeguarding a person's wellbeing.

3.6 Your data will not be transferred, stored or processed outside of the EU.

3.7 LiNCHigher take all appropriate organisational and technical measures to prevent loss, unauthorised access, use or disclosure of personal data. These are reflected in more detail in section 9.

4. Data processing purposes and lawful bases

4.1 The table below outlines the types of personal data we collect and why, along with our lawful basis for processing that data – these are the conditions we are required to meet by law.

Information we collect	Purpose for collection and sharing	Lawful basis for processing
<p>Pupils/parents/carers/teachers/advisers:</p> <p>*Personal data: full name/full address/name of school or college attended/year group/date of birth/gender/armed forces family status/free school meal status/contact details such as email address/school or college worked at/relationship with learners/job title</p> <p>*Special category (sensitive) personal data: ethnicity/gender/disability or medical condition/care status/young carer status/Service Family/Free School Meals/Pupil Premium</p> <p>*Different levels of personal data will be collected depending on which group you fall into.</p>	<p>To enable recording of individuals taking part in LiNCHigher activities. To enable further tracking of pupil's educational attainment and employment outcomes, including through sharing with HEAT.</p> <p>To ensure your eligibility in accessing specific LiNCHigher activities</p> <p>To enable the success of LiNCHigher activities to be evaluated.</p> <p>To prove to our funders, the Office for Students and Department for Education, that we are working with the people that our funding is provided for.</p> <p>To ensure the safety of learners when attending certain activities, such as residential events (staying over at one of our universities).</p>	<p>To perform a task carried out in the public interest or in exercise of official authority. The processing of special category data is for reasons of substantial public interest, supported by statutory and government purposes (as set out by the Office for Students and Department for Education).</p> <p>Consent: we may ask for your explicit consent to process your data in some circumstances such as: if you are a parent consenting for a pupil who is under 16 years of age (this will usually be collected by the relevant school or college), fall into a group with specific needs, if we wish to ask for your permission to take your photograph or video, to contact you about services by emailing you, or to take part in a specific event. Consent will always be optional, freely given and fully informed and you will be given the chance to opt out of processing or receiving marketing materials by email. Records of consent and changes to consent/permissions, will be maintained and updated accurately by LiNCHigher.</p> <p>Legitimate interests: in some instances, it will be in our legitimate interests to process your data in a way that you would expect and anticipate – such as to reply to an enquiry you have made directly to LiNCHigher by telephone, email or via our website.</p>

Information we collect	Purpose for collection and sharing	Lawful basis for processing
Feedback and evaluation of LiNCHigher activities. This may sometimes be collected by an appointed third-party organisation.	To report on the successes and impact of LiNCHigher activities, such as reporting to the OfS and sharing feedback and outcomes with LiNCHigher partners, and others involved in widening participation.	Reporting will be in the form of numbers only, anonymised or aggregated data and will not contain any information that could identify any person.

5. Failure to provide personal information

- 5.1 If you fail to provide certain information when requested, we may not be able to allow you, your child or student to take part in certain LiNCHigher activities, or to provide other services to you.

6. Change of Purpose

- 6.1 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

7. Automated decision making

- 7.1 Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. LiNCHigher does not use automated decision making.

8. Data retention: how long information will be used for

- 8.1 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.
- 8.2 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.
- 8.3 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.
- 8.4 LiNCHigher records containing personal data, will be maintained 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).
 - if you enter Higher Education within this time, until 15 years after you graduate.

9. Technical security measures and data breaches

9.1 LiNCHigher are committed to protecting the privacy and security of the personal information we collect and process and take this responsibility very seriously. We have a robust data breach reporting process in place, of which all LiNCHigher staff members are aware.

9.2 We also have the following measures in place to avoid data breaches from occurring:

- Personal data is saved on restricted access drives only and can only be accessed by those who need access to the data. LiNCHigher staff are employed by Lincoln Bishop University (the lead organisation for the LiNCHigher consortium). Data is stored electronically on secure University servers.
- Personal data is not transferred outside of the EU.
- Any personal data being shared outside of LiNCHigher, is encrypted.
- Sharing of personal data outside of LiNCHigher will be covered by an appropriate agreement with the receiving organisation – the agreement will include specific reference to security measures in place which are reviewed by LiNCHigher for suitability.
- Any suspected data breaches will be investigated and reported in accordance with Lincoln Bishop University's data protection policies and procedures.

10. Your rights

10.1 Individuals have certain legal rights regarding the processing of personal data, set out in the data protection laws. As LiNCHigher is based at Lincoln Bishop University, we are required to comply with data protection policies put in place by Lincoln Bishop University.

10.2 More information about your rights can be found here: www.lincolnbishop.ac.uk/about/governance/data-protection

10.3 If you would like to make a request in relation to your right of access to your records (Subject Access) or in relation to any of your other individual rights, please contact:

10.3.1 Data Protection Officer Details

10.3.2 LiNCHigher's Data Protection Officer is based at and works for Lincoln Bishop University. You can contact the Data Protection Officer at informationcompliance@lincolnbishop.ac.uk

10.3.3 Full details of Lincoln Bishop Universities' data protection policies and procedures, to which we are required to adhere can be found here: www.lincolnbishop.ac.uk/about/governance/data-protection

10.3.4 You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. ICO contact details: www.ico.org.uk

11. Web browser cookies

- 11.1 LiNCHigher websites may contain hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by cookies. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

11.2 What is a Cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we will assume that you are happy to receive all cookies on the LiNCHigher website. However, you can change your cookie settings at any time.

- 11.3 It is important to note that if you change your settings and block certain cookies, you will not be able to take full advantage of some features of LiNCHigher's services.
- 11.4 On the LiNCHigher website, cookies record information about your online preferences and allow us to tailor our websites to your interests.
- 11.5 During the course of any visit to the LiNCHigher website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

11.6 How does LiNCHigher use cookies?

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience.

11.7 Third party cookies in embedded content on the LiNCHigher pages

- 11.7.1 Please note that during your visits to the LiNCHigher website you may notice some cookies that are not related to the services LiNCHigher provides.
- 11.7.2 We sometimes embed content from social media and other third-party websites. As a result, when you visit a page containing such content, you may be presented with

cookies from these websites and these third-party cookies may track your use of the LiNCHigher website. LiNCHigher does not control the dissemination of these cookies and you should check the relevant third party's website for more information.

- 11.7.3 Where LiNCHigher embeds content from social media and other third-party websites, some websites may use Google Analytics to collect data about user behaviour for their own purposes. LiNCHigher does not control this. For more information, see the Google webpage “How Google uses data when you use our partners’ sites or apps”.

11.8 Other information collected from web browsers

Your web browser may also provide LiNCHigher with information about your device, such as an IP address and details about the browser that you are using.

11.9 Do not track (DNT) browser setting

DNT is a feature offered by some browsers which, when enabled, sends a signal to the website to request that your browsing is not tracked, such as by third party ad networks, social networks, social networks and analytic companies. This website does not currently respond to DNT requests.