

Privacy notice for the OfS Postgraduate Survey (PGS) pilot 2022

1. Introduction

This notice applies to the OfS Postgraduate Survey (PGS) pilot 2022.

The Office for Students ('OfS') is the regulator of the higher education sector in England and has certain statutory functions set out in the Higher Education and Research Act (HERA) 2017. You can find more information about the OfS and the work that we do on our website:

www.officeforstudents.org.uk

The OfS is committed to protecting your personal information and being clear about what information we hold about you and how we use it. This privacy notice sets out information about who processes your information, what they use it for, the legal bases for this processing, and your rights under data protection legislation. This notice is regularly reviewed and sometimes updated, for example when organisations change their name, or to clarify how your information is used. Updates may be made at any time and you will always find the most up-to-date version at www.officeforstudents.org.uk/ofs-privacy/other-privacy-notices/.

2. Data controller and Data Protection Officer

The OfS is the 'data controller' of any personal information collected within scope of this privacy notice. For the purposes of the pilot survey, Ipsos MORI is acting as the 'data processor' on behalf of the OfS, which means they can only process personal information on our instructions. The OfS has a data protection agreement in place with Ipsos MORI, which provides the necessary protection under the law to safeguard students' information. For example, they are forbidden under contract with the OfS from using the pilot survey data they have for any other purpose.

Our location and contact details are below:

Office for Students
Nicholson House
Lime Kiln Close
Bristol
BS34 8SR
Tel: 0117 931 7317
Email: dp@officeforstudents.org.uk

Our Data Protection Officer (DPO) is the first point of contact for people whose information is processed. You can contact the DPO using the details above. You should note that this email

address is monitored by other members of the OfS's data protection team. Therefore, please mark any correspondence 'for the attention of the Data Protection Officer'.

Both the OfS and Ipsos MORI are registered with the Information Commissioner's Office and you can check the entry details at ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/.

The OfS will appoint a data dissemination provider to disseminate the results of the pilot survey to participating universities and colleges and students' unions. This data will not be made publicly available.

3. What personal information we will hold and use

The PGS pilot survey is being carried out by a survey agent named Ipsos MORI, an independent research agency, on behalf of the OfS. The OfS is the regulator of the higher education sector in England and has certain statutory functions set out in the Higher Education and Research Act 2017. The survey forms part of OfS' legal requirement under this Act to ensure the quality of higher education in the providers it regulates.

The personal information we will collect and use as part of this survey is set out below:

- name (including surname)
- date of birth
- sex
- course details
- unique identifiers of eligible students
- contact details: email address, telephone number.

Special category data:

- ethnicity
- disability (if applicable).

The collection of special category data for ethnicity and disability will ensure that individuals with these characteristics are adequately represented and that their views and experiences are considered.

In addition to your survey responses being collected through the survey instrument, Ipsos MORI also collect metadata such as screen resolution, method of participation and time taken to complete the survey. This information is supplied to the OfS and is used only for survey development and evaluation purposes.

Your participation in this research, together with your individual responses to the questions, will be kept strictly confidential in line with information-security requirements and standards as agreed between Ipsos MORI and the OfS. We can assure you that you will **not** be identifiable in any published results. The results of this research that are made available to universities and colleges, will be anonymised and provided in the form of statistical information only. The results of the pilot survey will not be made publicly available, but the OfS may publish findings aggregated at a high level.

4. Our purpose for using the information

We can only use your personal information where we have a specific purpose or purposes for doing so. The pilot is designed to survey postgraduate taught students.

The PGS survey aims to:

- provide data that support universities and colleges in improving the student experience
- provide information that contributes to the public accountability of higher education
- provide information to help the OfS fulfil its regulatory duties under the Higher Education and Research Act 2017.

Whereas the PGS survey pilot will:

- test and evaluate the administrative processes required to survey taught postgraduate students
- understand how taught postgraduate students answer the survey and evaluate whether the proposed questions are appropriate.

If we want to use your personal information for a reason other than the purposes set out above, we will tell you before we do so and provide further information about the new purpose(s).

5. Legal basis for using your personal information

Under data protection legislation, we require a legal basis to be able to process your personal information for the purposes set out below:

In this case, the legal basis is:

- processing 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 data is necessary for statistical and research purposes in accordance with Article 89(1) and Schedule 1 part (4) of the DPA 2018 (see GDPR Article 9(2)(j)).

If you wish to opt out at any stage when Ipsos MORI contacts you directly, you can state that you do not wish to take part and you will not be contacted again by Ipsos MORI. Please note, you must actively opt out if you do not wish to be surveyed; not responding to the email or telephone interview does not constitute an opt-out.

If you opt-out at any stage it is important you verify your identity. All your contact details will be securely and permanently deleted from the contact list used for the survey and you will not be contacted by Ipsos MORI again. You may opt-out by emailing Ipsos Mori at thepostgradsurvey@ipsos.com.

For further information, please contact the research team at thepostgradsurvey@ipsos.com.

If you opt-out, we will destroy all relevant personal information unless we are relying on a different legal basis to justify keeping your personal information. If that is the case, we will tell you in writing.

6. Information we obtain

To clarify, the OfS is the 'data controller' of any personal information collated and transferred for this pilot survey. The OfS may, from time to time, engage other non-statutory bodies or agents to carry out functions on their behalf. In order to carry out this survey the OfS has appointed Ipsos MORI. More specifically, the OfS will request student contact details from universities and colleges to be passed to Ipsos MORI. The OfS, as the data controller, will retain control of any personal data transferred under contract with non-statutory bodies.

Your personal information will be kept strictly confidential by all parties involved, will be stored securely within the UK and will not be transferred outside this territory.

7. Who we share your personal information with and why

The personal information (student contact details) provided by your university or college is used solely by Ipsos MORI to invite you to participate in the survey and to validate that the correct individuals are responding to the survey.

We will not routinely pass your information to any other organisation except where required to do so as part of our functions or by law.

8. How long we hold your personal information

We are only able to retain a copy of your personal information as long as it is still needed for the purpose(s) for which it was collected.

Your contact details (address, telephone number and email) will be kept for no longer than three months. However, personal information such as your name, date of birth and special category data will be kept until the evaluation of the pilot has completed.

After that point, your personal information will be confidentially and securely disposed of. If we need to keep your personal information for longer than the retention period above, we will inform you and explain our reasons.

Pseudonymised responses to the PGS pilot survey will be retained indefinitely by the OfS for use in producing statistical analysis and research into quality and student experience, and trends in higher education. Pseudonymisation is a technique that replaces or removes information that identifies an individual. The information will not be used to make any decisions about individuals and any reports the OfS publish will not include individualised data.

9. Where your personal information will be stored

Your personal information will be stored on secure servers in the UK and will not be transferred outside this territory unless required by a court order.

10. How we protect your personal information

The OfS and Ipsos MORI take full responsibility for keeping your personal information secure. As such, we take every reasonable precaution to ensure your information is protected from loss, theft or misuse. The OfS has a number of security measures in place to protect your personal information, including:

- appropriate physical security of our offices
- accredited to the Cyber Essentials PLUS standard for cybersecurity – see <https://www.ncsc.gov.uk/cyberessentials/overview>
- all staff are required to undertake training in data protection and information security on joining the OfS
- formal information security policies that must be read and understood by all staff
- personal information is only available to those members of staff who require access as part of their role.

You can read more information on our approach to information security on our website: www.officeforstudents.org.uk/ofs-privacy/information-security/.

Ipsos MORI has regular internal and external audits of its information security and is registered to the International Standard for Information Security, ISO 27001.

Ipsos MORI is a member of the Market Research Society too, which means they sign up to carrying out market research in an ethical and compliant way.

11. Your rights over your personal information

Once your personal information has been collected, you have certain rights in relation to that personal information that may be exercised. You have the right to request:

- a copy of your personal information
- inaccurate personal information held about you is corrected
- your personal information to be deleted
- processing of your personal information is restricted
- a copy of your information in a format that allows easy transfer ('data portability')
- that you are not subject to automated decision making or profiling (if these take place).

All these rights have certain limitations depending on the request and the purpose for which we are holding your personal information. Further information can be found about these rights and our processes for handling such requests at: www.officeforstudents.org.uk/privacy/individual-rights-under-the-general-data-protection-regulation/.

12. Use of cookies on the OfS website

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to complete statistical reports on website activity. For further information about our cookies visit:

www.officeforstudents.org.uk/cookies/ or for further general information visit:
www.aboutcookies.org or www.allaboutcookies.org.

13. Complaints about the use of your personal information

If you are unhappy with the way in which your personal information has been handled by the OfS, please contact us via our Data Protection Officer (details in section 2) and we will try to resolve your issue informally.

If you remain dissatisfied, you can complain to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office (ICO) and they can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Email: casework@ico.org.uk

14. Changes to this notice

We keep our privacy notices under regular review and we will inform you of any changes to this notice by placing an update on our website at www.officeforstudents.org.uk/ofs-privacy/other-privacy-notices/.

This privacy notice was last updated in February 2022.

15. How can I obtain further details about this privacy statement or our compliance with it?

If you have any questions or require further information about this privacy statement, Ipsos MORI's compliance with data protection laws or the information held about you for this research; please contact the OfS using the details above or Ipsos MORI's Compliance Department. They can be contacted by email sent to: compliance@ipsos.com with 21-047837-00 PGS 2022 as the subject or by letter sent to: Ref: 21-047837-00 PGS 2022, Compliance Department, Ipsos MORI UK Ltd, 3 Thomas More Square, London, E1W 1YW.

16. Can I provide feedback on the survey?

Yes. Ipsos MORI and the OfS are committed to continuously improving the survey. Should you have a question, comment and/or complaint about this research, please contact Ipsos MORI at pgts@ipsos.com or the OfS at info@officeforstudents.org.uk, or by letter sent to: Higher Education Research, Ipsos MORI, Kings House, Kymberley Road, Harrow, HA1 1PT