

OfS analysis of social media: Full privacy notice

Full privacy notice

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 2017. You can find more information about 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 how the OfS will use media monitoring tools to identify and analyse trends in communication. This notice sets out how we will use your personal data, and your rights. It is made under Articles 13 and/or 14 of the General Data Protection Regulation (GDPR).

The OfS will use a social media tool to bolster and improve our communications in a few key strategic ways:

- to build our relationship with students and the higher education sector. This is consistent with our communications strategy and our student engagement strategy;
- to identify the best ways and opportunities to engage students in areas of regulation which affect them directly;
- to identify communities within the higher education sector and students, that might have an interest in key areas of our work.

The OfS is registered with the Information Commissioner's Office (ICO). Our registration is ZA309955 and you can view our entry details on the ICO's website: <https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

Data controller and Data Protection Officer

The OfS is the 'data controller' of any personal information collected within scope of this privacy notice. Our Data Protection Officer (DPO) is the first point of contact for people whose information is processed.

The contact details for our DPO are below:

Office for Students

Nicholson House

Lime Kiln Close

Bristol

BS34 8SR

Tel: 0117 931 7270

Email: dp@officeforstudents.org.uk

How we will use your information

We can only use your personal information where we have a specific purpose or purposes for doing so.

In line with the OfS's social media strategy and student engagement strategy, the purpose is to use social media to understand what the wider public is saying about the Office for Students and the sentiment and conversations around other topics relevant to students and the higher education sector.

To achieve the above aim, we will use a social listening tool to generate aggregate level reports about trends and insights across the higher education sector.

The tool will search through any piece of online content in the public domain. The OfS conducts keyword searches (for example, 'university' AND 'coronavirus'). These searches produce reports of content which match these criteria, and which analyse the impact of the content found. The OfS will then use the reports to identify general trends and issues and how they affect different communities, which will help to inform our own communications strategy. The OfS will not be monitoring individuals or profiling individuals.

The source for the information will come from the following:

- blogs
- social media sites
- forums
- websites
- news sites

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 above.

In this case, the legal basis is:

- that processing the personal information is necessary for the purposes of the OfS's public task [GDPR Article 6(1)(e)].

Public Task

The lawful basis for processing your personal data is it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. In this case use of the tool relates to s35 of the Higher Education Research Act 2017, where the OfS's role is to provide advice on good practice. The OfS may identify and give advice on good practice relating to promoting equal opportunities. The social media listening tool will allow us to identify the most effective ways to foster such good practice in the sector.

Special category data

The social listening tool will pick up publicly available special category data, however this will be aggregated, for example: publicly available demographic or protected characteristic data.

What personal information we will collect

The aggregate level reports are generated using publicly available personal data provided by users in their social network profiles, in line with the terms of conditions on the social media website, for example:

- public social media profiles
- public social media posts
- username
- followers/networks
- online behaviour, for instance likes and re-tweets.

Personal data was provided by social media platforms and other public sources.

With whom we share your personal information

The OfS will not be sharing any personal data, as the data the tool provides is aggregated.

Where your personal information will be stored

The data is stored with Amazon Web Services in Ireland.

How we protect your personal information

The OfS is accredited to Cyber Essentials Plus to demonstrate and assure our commitment to good practice in cyber security. Within the OfS, the information will only be accessible to designated members of our external relations team, IT administrators, and members of governance to carry out compliance activities.

Your rights over your personal information

When your personal information is 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 is 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 subjected 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

How long we will hold your personal information

We are only able to retain a copy of your personal information for as long as it is needed for the purposes for which it was collected. Aggregate reports, which are anonymised, will be retained by the OfS for a maximum of 5 years. Any personal data that underpins the aggregate reports, will be retained by the social media monitoring and listening company for a maximum of 5 years.

Use of cookies on the OfS website

Cookies are text files placed on your computer to collect standard internet log information and site 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 use of cookies visit: www.officeforstudents.org.uk/cookies or for further general information visit: www.aboutcookies.org or www.allaboutcookies.org

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, dp@officeforstudents.org.uk, and we will try to resolve your issue informally.

If we have not been able to resolve the issue to your satisfaction, you can make a complaint to the data protection authority. In the UK, this is the Information Commissioner's Office (ICO); they can be contact at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

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, and also by updating our notice box when you log into OfS webinars.

This privacy notice was last updated on 10 September 2020.