



UNIVERSITY COLLEGE  
OF ESTATE MANAGEMENT

[www.ucem.ac.uk](http://www.ucem.ac.uk)

T +44(0)118 921 4696 E [enquiries@ucem.ac.uk](mailto:enquiries@ucem.ac.uk)

Horizons, 60 Queen's Road, Reading, RG1 4BS

# Outreach and Widening Participation Activity Privacy Notice

---

Reference:

Version: 1.00

Status: Approved

Author: Charlotte Thackeray

Date: 02/10/2023

# Approval History

Version	Date	Name	Organisation
1.00	02/10/2023	Data Protection Officer	UCEM

# Document History

Version	Date	Reason	Person
V0.01	28/09/2023	First draft sent for approval	C. Thackeray
V0.02	02/10/2023	Updates requested by the Data Protection Officer	C. Thackeray

University College of Estate Management (UCEM) is fully committed to protecting the rights of individuals to have their personal data collected and stored securely and used for only legitimate and lawful purposes for which their consent has been sought. UCEM complies with the Data Protection Act 2018 and the General Data Protection Regulation 2016 (GDPR).

UCEM takes the security and integrity of all the personal data it holds very seriously. UCEM has a [Data Protection and Privacy Policy](#) and all staff are trained in Data Protection to ensure good practice. In addition, UCEM works with its collaborative partners to ensure its approach to data protection is clearly communicated to the parents, children and young people who work with all partners.

### **Why are UCEM collecting your data?**

UCEM undertakes outreach activities with schools, colleges and communities across the UK, to support progression and widen access into higher education. This is part of UCEM's commitment to improve access to higher education and increasing diversity in the built environment, reflecting government policy to widen participation in higher education, as overseen by the [Office for Students](#).

UCEM collects details of individuals taking part in our activities for the following reasons:

- To plan activities
- To assess eligibility of students for participation in our outreach activities
- To monitor participation in activities
- To evaluate and report on the effectiveness and impact of our outreach activities
- To understand the student journey through education and progression to higher education/future careers

### **Why are UCEM able to process data?**

- Under data protection law UCEM is able to process this data because it is necessary for a task carried out in the public interest (Article 6(1)(e) GDPR: *"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"*).
- In some circumstances, for example if you participate in certain activities as part of UCEM's outreach programmes, UCEM may process your data because you have given your consent for us to do this (Article 6(1)(a) GDPR: *"the data subject has given consent to the processing of his or her personal data for one or more specific purposes"*).
- UCEM is able to process special category data as it is justified under Article 9(2)(g) UK GDPR - *"processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject"*. UCEM's substantial public interest conditions (which will vary depending on the nature of the processing) are Schedule 1, Part 2, Paragraph 6 of the Data Protection Act 2018 (Statutory purposes) or Schedule 1, Part 2, Paragraph 8 of the Data Protection Act 2018 (Equality of opportunity or treatment).
- We are also able to process special category data for statistical purposes, as this is justified under Article 9(2)(j) GDPR - *"processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes"*. We are relying on Schedule 1, Part 1, Paragraph 4 of the Data Protection Act 2018 (Research) as our condition for processing.

**The data UCEM collects**

UCEM collect the following data from individuals either directly, or via schools and colleges, for evaluation and monitoring purposes. The amount of data UCEM collect is dependent on the type of activity the individual engages with, but as a minimum UCEM would ask for: full name, date of birth, postcode, school college they attend, ethnicity and gender:

Full name	Date of Birth
School/College Name	Gender*
Postcode	Unique Learner ID
Ethnicity	Disability
Looked After Child / Care Leaver status	Young Carer status
Estranged status	First generation into Higher Education
Pupil Premium / Free School Meals	Other equal opportunity monitoring information where appropriate

\*Due to changes on the HEAT database, this information as collected by schools and colleges will be recorded on HEAT under the label ‘Sex’. Data collected directly from participants as gender will be recorded in the same way.

**How UCEM store your data and keep it safe**

The privacy of students is important to UCEM and the University College takes care to safeguard it. Information will be used and stored in accordance with the GDPR and Data Protection Act 2018, as well as all legislation enacted in the UK in respect of the protection of personal data ("Data Protection Legislation").

Student data will be stored on a secure database (the [Higher Education Access Tracker - HEAT](#)) and used to administer participation in outreach activities and projects. For evaluation and monitoring purposes only, this data may also be shared back with your school or college, with UCEM’s Regulatory Compliance team, with government and funding bodies\*, and UCEM’s collaborative partners\*\* to help run and evaluate the effectiveness of any activity. The project and its partners will not use your record in a way that would affect you individually and UCEM will not release data to anyone who is unauthorised. The University College does not, and will not, sell personal data to third party organisations.

\*Government, sector-owned agency and funding bodies include: Office for Students (OfS), Higher Education Statistics Agency (HESA), Department for Education, Local Authorities, the Universities and Colleges Admissions Service (UCAS).

HESA and HEAT may share your data as detailed in their own privacy notices, which are accessible at the links provided:

- Privacy notice for [HEAT](#)
- Privacy notice for [HESA](#)

\*\*UCEM’s collaborative partners include: universities, schools and colleges, Higher Education Access Tracker (HEAT) service subscribers, Class Of Your Own, Chartered Surveyors Training Trust Governors for Schools, select UCEM employers.

**Data retention - how long UCEM will keep your data**

UCEM keeps student data for extended periods of time to enable it to determine whether its outreach activities have been successful in widening access to Higher Education. UCEM will retain records securely for the durations detailed below, and will review our retention periods annually in line with Information Commissioner’s Office guidance and other best practice in

the sector. All the data UCEM collect is stored in the HEAT database, and the HEAT data retention policy is outlined below:

Under the terms of this schedule the following is applied to personal data:

1. Where an outreach participant has supplied a first name, last name, date of birth, and postcode and has not withdrawn or denied permission for their data to be included in research, their record is considered expired and should not be retained for longer than 15 years from:

- a) the year in which they might be expected to enter HE, or
- b) the date their record was created, or
- c) when they last engaged in outreach activity, whichever of these conditions is most recent.

Once expired, according to the criteria above, the record will appear in the Retention Filter to be reviewed by the collecting member organisation.

2. Where personal data is considered incomplete, i.e., the following has not been captured:

- a) any or all of first name, last name, date of birth, postcode
  - b) and/or the data subject's permission for inclusion in tracking research,
- it will be considered expired after 7 years from the date the record was created. It will appear in the Retention Filter, except where a data subject has taken part in an activity within the last 7 academic years.

Sustained Outreach Programme data retention: All this data is held on HEAT and the above HEAT data retention policy applies. The data is also held on UCEM's internal systems outreach application and this will be anonymised two academic years after a student has finished participating in an Access programme.

Any personal data gathered through activities or approved platforms is reviewed regularly, and data is deleted when no longer required for monitoring, research, and evaluation purposes.

### **Your rights**

You have a number of rights under data protection law:

- The 'right to object' to your data being processed
- The right to request for your data to be removed from our system
- The right to request a copy of the data UCEM hold about you

If you have a query, complaint or would like a copy of the data you have supplied to us, please contact the UCEM Outreach and Inclusion team via email [outreachandinclusion@ucem.ac.uk](mailto:outreachandinclusion@ucem.ac.uk) or telephone +44 (0)118 467 2100.

You can contact the UCEM Data Protection Officer at [dataprotection@ucem.ac.uk](mailto:dataprotection@ucem.ac.uk)