**Reaching Wider: North and Mid Wales Partnership Privacy Notice**

The purpose of this Privacy Notice is to help you understand why Reaching Wider: North and Mid Wales Partnership (RWNMWP) asks for your personal data, how we use your data, our obligations under the law and your rights.

The RWNMWP is a partnership of higher education and further education in the North and Mid Wales region. Our Executive Steering group members are Bangor University (Lead Partner), Aberystwyth University, Wrexham Glyndwr University, Coleg Cambria, Coleg Ceredigion, Coleg Cymraeg Cenedlaethol, Grwp Llandrillo Menai, and NPTC Grwp.

RWNMWP is committed to preserving your privacy. The information you provide will only be processed in accordance with this privacy notice, and according to obligations laid out in the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

For children / young people under the age of 16 we will always collect parental consent to use data. Parental consent forms are sent to schools and community groups where they are circulated amongst pupils. If a parent/guardian wishes their child take part in one of our events they should complete the consent form and send it back to us.

**What is the lawful basis for processing the data?**

The work RWNMWP carry out to promote wider engagement and participation in higher education is carried out in the public interest. We need to ensure that the money we receive from government funding agencies is spent appropriately and has a positive impact. In order to measure impact and to conduct our activities, we need to gather student participation data.

The RWNMWP processes personal data as it is necessary for it to perform a task in the public interest and for its official functions.

The lawful basis for processing special category data is on the basis that it is in the substantial public interest and is necessary for statistical purposes to monitor equality of opportunity in accordance with the Equality Act. This processing is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

The lawful basis for the processing of special category data collected for residential and out of hours activity, is explicit consent.

The lawful basis for processing the use of photographs and marketing communications is explicit consent.

**RWNMWP collects data on individuals for the following reasons:**

1. For the purposes of monitoring which allows RWNMWP to:

* Fulfil compulsory external reporting requirements to regulatory bodies such as the Higher Education Funding Council for Wales (HEFCW).
* Provide a clear picture of the activities we deliver and the people we work with.
* Ensure that we are reaching those that could benefit most from outreach activities.

2. For the purposes of research and evaluation which helps us to assess the effectiveness of different initiatives on widening participation to Higher Education. This includes the anonymous long-term tracking of participants’ education journeys, to identify how many RWNMWP participants go on to study at university.

3. To help us identify participants who belong to groups, which are under-represented in Higher Education and to ensure that people from these groups are given priority access to RWNMWP activities. For further information on this please visit - [Widening access | HEFCW](https://www.hefcw.ac.uk/en/our-responsibilities/widening-access/)

4. To ensure the health and safety and wellbeing of all participants in our programmes and to assist with pastoral and welfare needs e.g. ensuring that we are aware of medical conditions and disabilities.

5. To send relevant and necessary information regarding forthcoming activities as well as marketing communications.

**What information do we collect?**

We collect the following pieces of information for all participants who take part in our activities, this helps RWNMWP demonstrate that our activities are engaging Reaching Wider cohorts identified by HEFCW as being currently under-represented in Higher Education.

* Name
* Contact details
* Date of birth
* Gender
* Unique Learner Number
* Home postcode
* School/ College/ Organisation
* Ethnicity
* Disability
* Free school meals or Educational Maintenance Allowance eligibility
* Whether the student is living in care or has in the past
* Photographs and films- During events we may take photos and films which we use for marketing purposes such as on our website, social media platforms, leaflets and case studies.
* Registers of those who participate in activity
* Contact information of those who participate in online activity
* Pre and post questionnaires to ascertain impact and how useful the activity is

Where possible we also collect the following pieces of information:

* Whether the student’s parent(s) or siblings went to university
* The occupation of the student’s parent(s)
* Whether the student is a carer of a family member or dependent
* Prior Educational Achievement

For residential and out of school hours activities we also collect details of medical and special requirements for the purpose of providing support and ensuring the health and safety of participants and staff. These include:

* Dietary requirements
* Cultural requirements
* Emergency contact details
* Allergies
* Medical arrangements
* Medication taken

**How will RWNMWP process the data?**

1. For initiatives, which are organised directly with schools, a participant consent form is sent home to parents via the school. The form collects information about the participant along with consent for the information to be used for the purposes outlined above. The form is returned to the school and the school arrange the secure transfer of the information to RWNMWP.
2. The participant information is visually checked and inputted to our secure online database which is currently called ‘Upshot[[1]](#footnote-1)’by a member of the RWNMWP.
3. Information in the database can only be accessed by designated members of the RWNMWP and the central services team that manages the Upshot service.
4. For the purposes of tracking, monitoring and research only data may be shared with external bodies such as University and College Admissions Service (UCAS). This allows us to see the Higher Education destination of participants who have taken part in our activities.
5. For National Reaching Wider projects anonymised participant data may be shared between the Reaching Wider South West Wales partnership and Reaching Wider South East Wales partnership. Anonymised data will only be shared if participants are receiving activities which are delivered by the other Reaching Wider partnerships.
6. Organisations processing personal data on the Universities behalf will be bound by an obligation to process personal data in accordance with Data Protection legalisation.
7. All internal and external reporting which utilises the collected data, does so in an aggregated fashion, meaning that only totals are shown, so individuals’ data is never disclosed within a report.

**Security of your information**

Data protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure.

Only members of RWNMWP team Reaching Wider team who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, and paper files will be stored in secure areas with controlled access.

Upshot can only be accessed by designated members of the RWNMWP team Reaching Wider team and the central team that manages the Upshot service.

Your data may be shared with third party service providers, but only for the purpose of considering and processing your request, communicating with you about RWNMWP and conducting research on the age range, geographical location and subject(s) of interest of those interested in engaging with RWNMWP.

**How long will RWNMWP retain your data for?**

RWNMWP will retain participants’ data in line with the Bangor University Retention Schedule[[2]](#footnote-2). The University retains your information in line with established higher education retention schedules.

In summary: paper copies of information will be retained for 1 complete academic year after the activity took place.

Electronic records are held on Upshot database for a period of 10 years after an event, with data reviewed annually on 31st August to remove data older than 10 years old.

Anonymised data shared / linked with third parties for research purposes will remain within the third party databases for the lifetime of the third parties’ projects, as individuals are no longer identifiable.

**What are my rights in respect of my data?**

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information. If you have provided consent to RWMNWP to process any of your data then you also have a right to withdraw that consent.

As lead partner for the RWNMWP, Bangor University is the data Controller in relation to your information, as defined in the Data Protection Act 2018 and is committed to protecting your rights.

For the Brightside mentoring program Bangor University and Brightside will act as joint controllers as defined in the Data Protection Act 2018 and is committed to protecting your rights.

Any requests or objections should be made in writing to Bangor University’s Data Protection Officer at:

Governance Services
Corporate Services
College Road
Bangor
LL57 2DG
info-compliance@bangor.ac.uk

If you have further questions about how we process individual monitoring data, please feel free to get in touch with RWNMWP at reachingwider@bangor.ac.uk.

**How to make a complaint**

If you are unhappy with the way in which your personal information has been processed you may in the first instance contact the University’s Data Protection Officer using the contact details above.

If you remain dissatisfied the you have the right to apply directly to the information commissioner for a decision. The information commissioner can be contacted at:-

Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

1. [www.upshot.org.uk](http://www.upshot.org.uk) [↑](#footnote-ref-1)
2. Bangor University - [University Record and Data Retention Schedule | Governance Services | Bangor University](https://www.bangor.ac.uk/governance-and-compliance/UniRetSched.php.en) [↑](#footnote-ref-2)