

## **HEA STUDENT COLLECTION NOTICE 2019**

### **Who we are (controller)**

The Higher Education Authority (HEA) with an address at 3 Shelbourne Buildings, Shelbourne Road, Ballsbridge, Dublin 4. The HEA is a public body with authority derived from the Higher Education Authority Act 1971 (the 1971 Act).

The HEA are responsible for funding higher education institutions and advising the Minister for Education and Skills on policy formulation to develop the highest standards in our higher education system.

This notice sets out the basis on which any personal data collected from you, or from others, will be processed by the HEA. Please read the following carefully to understand HEA practices regarding your personal data and how the HEA will treat these data.

Data are collected by each higher education institution, including at registration, and are shared with the HEA via annual returns to the student records system in the HEA pursuant to a data sharing agreement, a copy of which is available on request from the HEA Data Protection Officer

The HEA Data Protection Officer (“DPO”) may be contacted at [dataprotection@hea.ie](mailto:dataprotection@hea.ie).

LYIT is the joint data controller; contact name. The LYIT Data Protection Officer (“DPO”) may be contacted at [dpo@lyit.ie](mailto:dpo@lyit.ie).

## **What personal information does the HEA collect from you or obtain from others?**

The HEA collect student record and graduate outcome data from higher education institutions so that the HEA can perform their statutory functions under the 1971 Act. The HEA collect and process the following personal data:

1. Student record system data (SRS) based on institution's registration data.
2. Equal Access Survey data based on the voluntary equal access survey presented to students;
3. About nine months after you graduate, the higher education institution may contact you to ask you to fill in the HEA Graduate Outcomes Survey. This is voluntary, and the higher education institution will not give your phone or email contact details used for this survey to the HEA.

## **What other information does the HEA collect from you or obtain from others?**

During your studies, you will be invited to participate in the Irish National Survey of Student Engagement. Some of your information may be sent to the HEA to ensure that the survey is offered only to relevant target groups. Your information may be matched to your survey responses in order to allow for anonymous analysis of results, for example, by gender or full-time / part-time. Your responses will be treated confidentially and no individual student will be identifiable in any reports or results generated as a result of this survey.

## **Why does the HEA collect this information?**

The purpose for which the HEA uses this data is

1. for assessing the funding needs of HEIs, and,
2. for fact-based statistical analysis to help understand the real needs that higher education should meet, to promote equality of opportunity in higher education and to assist the Government in developing future higher education policies and investment.

The HEA does this by linking data from the Student Records System, the Equal Access Survey and information from the Graduate Outcomes Survey through student ID number and/or PPSN for more accurate statistical analysis to help improve education services and policies.

The HEA use student records to produce anonymised aggregate data in annual statistical publications.

The legal bases for the processing of your data are:

1. You have given your consent to the processing of your personal data for one or more specific purposes as set out in this document or,
2. The processing is necessary for compliance with a legal obligation to which the HEA and HEI are subject, in particular, but without prejudice to the generality of the obligations of the Higher Education Act 1971 or,
3. The 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 HEA pursuant to the Higher Education Act 1971 and the Social Welfare (Consolidation) Act 2005, or,
4. The processing of special category data is necessary for reasons of substantial public interest, on the basis of EU or Irish 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 or,
5. Statistical data may be processed in accordance with Article 89 of the GDPR and Section 42 of the Data Protection Act 2018.

### **Who the HEA shares your data with:**

The HEA shares records with other official bodies such as The Department of Education and Skills, City of Dublin Education and Training Board (CDET) and the Central Statistics Office for the following purposes:

## **1. Student Grant Application Verification**

The HEA will provide your student record to CDETБ (SUSI - Student Universal Support Ireland), an agent of the Department of Education and Skills. This record will include data on any previous enrolment in higher education in the Republic of Ireland. The HEA record is provided to CDETБ (SUSI) for the purposes of verifying data supplied as part of grant applications, verifying that a student is enrolled or registered in accordance with the rules of an approved institution, assisting in the processing of applications for grants and determining an applicant's eligibility for grant support under the education progression requirements of the Student Grant Scheme and the Student Support Act 2011.

## **2. Statutory Statistical functions**

The HEA records are also used by the Central Statistics Office in order to carry out their statutory functions of measuring population levels and monitoring public expenditure.

## **3. Research, equal opportunity, journalism, other legitimate interest/public function**

HEA student microdata is provided to the Department of Education and Skills to allow for research and analysis using this data within the Department, for instance for transition rate analysis and third level demand projections.

Public Service Identity (PPSN, name, address, date of birth) is sent to the Department of Employment Affairs and Social Protection Client Identity Services to verify PPSN for data quality purposes.

HEA administrative graduate data is linked via PPSN to Revenue administrative employment data, Department of Employment Affairs and Social Protection administrative benefits data and Department of Education and Skills administrative student data in the Central Statistics Office to analyse graduate outcomes and evaluate higher education effectiveness.

HEA administrative data are also shared with SOLAS and the Department of Public Expenditure and Reform to allow for policy formulation and statistical analysis.

**Anonymised aggregate (non-personal) data to third parties:**

The HEA will also supply anonymised aggregate data to third parties for the purposes of equal opportunities monitoring, Freedom of Information, research and journalism in the public interest. The data shared does not on its own identify any individual.

**How long does the HEA keep hold of your information?**

The time periods for which the HEA retain your information depends on the type of information and the purposes for which it is used. The HEA will keep your information for no longer than is required or permitted.

For further details on the applicable retention periods, please contact the HEA Data Protection Officer at [dataprotection@hea.ie](mailto:dataprotection@hea.ie)

**Does the HEA transfer your information outside The European Union or European Economic Area?**

No.

**What are your rights with respect to your personal data?**

You have the following rights:

- The right to access the personal data the HEA holds about you.
- The right to require the HEA to rectify any inaccurate personal data about you without undue delay.
- The right to have the HEA erase any personal data held about you in circumstances such as where it is no longer necessary to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.

- The right to object to the HEA processing personal data about you such as processing for profiling or direct marketing.
- The right to ask the HEA to provide your personal data to you in a portable format or, where technically feasible, to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- The right to request a restriction of the processing of your personal data.

Where HEA processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that the HEA have carried out before you withdrew your consent remains lawful.

You may exercise any of the above rights by contacting the HEA Data Protection Officer at [dataprotection@hea.ie](mailto:dataprotection@hea.ie)

You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. The local Supervisory Authority in Ireland is the Data Protection Commission. The website is [www.dataprotection.ie](http://www.dataprotection.ie)

To ensure your privacy and to protect the integrity of your data, the HEA will require you to verify your identity with a photographic ID before releasing or correcting your information.

### **What will happen if the HEA change the data collection notice?**

This notice may change each year. This notice is applicable to the 2019/20 academic year. A revised notice will issue in the event of any future changes.

### **How can you contact the HEA?**

The HEA Data Protection Officer can be contacted by email at [dataprotection@hea.ie](mailto:dataprotection@hea.ie). By phone: 01 2317100. Address: 3 Shelbourne Buildings, Shelbourne Road, Ballsbridge, Dublin 4.

## Schedule 1

The table below sets out a list of third parties with whom the HEA share your data.

Third party name	Description of services provided
The Department of Education and Skills	The HEA may share, subject to a data sharing agreement in 2019/20, identifiable microdata with the Department of Education and Skills to allow for transitions rate analysis from 2nd level to 3rd level and to produce 3rd level demand projections.
The Central Statistics Office	The HEA share identifiable microdata with the CSO to analyse graduate outcomes and to measure the effectiveness of the higher education system. HEA data is linked to other Government administrative datasets in the CSO.
SUSI – part of the CDET B (City of Dublin Education and Training Board)	The HEA match SUSI grant application data to HEA student record data using PPSN to verify previous attendance at HEA funded institutions.
The Department of Employment Affairs and Social Protection	The HEA share PPSN, name, address and date of birth data to verify PPSN data with Client Identity Services.
SOLAS	The HEA may share identifiable microdata with SOLAS to allow for transitions rate analysis from further education to higher education.

The Department of Public Expenditure and Reform	The HEA may share disaggregated course level data with DPER to allow for detailed labour market analysis.
External Contractors	The HEA, on occasion, contract external bodies to process microdata in order to fulfil statutory functions, e.g. geocoding of student address data.

## Schedule 2

### List of data items the HEA collect or obtain from higher education institutions

The data higher education institutions send to the HEA include, student records:

- Return year
- Institute code
- Academic year
- Programme name
- Programme code
- Programme type
- Anticipated length of programme in years
- Faculty title & code
- NFQ level
- Course name
- Course code
- Subject indicator
- CAO code
- Co-ordinating institutions
- Outreach, off campus marker
- Awarding body
- Funding indicator
- Add-on indicator to mark add-on courses recognising previous credit for entry
- Course completion credits
- Full time credits per year
- Course class indicator
- Teacher training marker
- Student ID
- CAO number
- PPS number
- Enrol status, student or graduate
- Course code

- Course year
- Mode of study
- ISCED code – field of study
- Subject 1
- Subject 2
- Subject 3
- Subject 4
- Non-Standard award code
- Grade for award
- PhD structure indicator
- Student code to indicate type of student, e.g. new entrant
- Non-Standard attendance tag
- Exchange indicator
- Gender
- Date of birth
- First name
- Surname
- Domiciliary of origin
- Address 1
- Address 2
- Address 3
- Address 4
- Address 5
- County
- Eircode
- Postal code for Dublin students
- Nationality
- Non-EU fee indicator
- Residence type during term-time
- Fees – free fees indicator
- DES grant indicator of grant status
- SUSI grant code as per SUSI file

- Post-Primary school number
- Leaving Cert points
- Leaving Cert year
- Leaving Cert exam results
- Last Institution attended
- Year left last institution
- Highest qualification
- Accumulated credits
- Current year credits
- Up-skilling initiative indicator, e.g. Springboard
- Fund indicator for students funded through the Fund for Students with a Disability
- Basis of entry to course

These data form part of the HEA Student Record System (SRS) database.

### **Equal Access Survey:**

Data collected as part of the Equal Access Survey is also returned to the HEA, these data are anonymised. Data sent to the HEA as part of this process include:

- Return Year
- Institution Code
- Academic Year
- Student ID
- Course Code
- Blind or deaf indicator
- Physical disability indicator
- Learning disability indicator
- Psychological, emotional, or mental health indicator
- Other condition indicator
- Support requirement
- Parental Status

- One Parent allowance status
- Ethnic culture

### **Graduate Outcomes Survey:**

The following Graduate Outcomes Survey data will be sent to the HEA:

- PPS number
- Student ID
- Date of birth
- County code
- Domiciliary of origin code
- Gender
- Mode of study
- Grade of award
- Institute name
- Course code
- Course name
- ISCED field of study information
- NFQ Level
- Programme type code
- Year of graduation
- Return year
- Response, yes or no
- Principal economic status – main
- Principal economic status – full
- Job title
- Occupation (broad)
- Organisation
- Employment (where)
- Employment Ireland
- Employment overseas
- Sector (broad)

- Employment type
- Contract type
- Salary
- Internship indicator
- Internship (time)
- Relevance level/area
- Need for qualification indicator
- Find out about job indicator
- Institution (where)
- Institution Ireland
- Institution overseas
- Further institution indicator
- Further course name
- Further ISCED field of study
- Award sought in further study
- Further mode of study
- Why do further study indicator
- Other activity A – unemployment status
- Other activity B – other activities
- Barriers to employment
- Same course again indicator
- Follow up willingness indicator

HEA SRS data and Graduate Outcomes Survey data are linked in the HEA for analysis purposes via Student ID and/or PPSN.