**Humber Outreach Programme : Privacy Policy**

**October 2025**

The Humber Outreach Programme (HOP) is committed to upholding the 7 key principles of the UK General Data Protection Regulations (UK GDPR), which are :

* Lawfulness, fairness and transparency;
* Purpose limitation;
* Data minimisation;
* Accuracy;
* Storage limitation;
* Integrity and confidentiality (security), and
* Accountability.

HOP is required to collect and process personal student data for students aged 11-19 in order to meet the impact monitoring requirements set out in its Funding Agreement Letter (funding contract) from the Office for Students.

This Policy is designed to ensure that HOP complies with the 7 key GDPR principles set out above in the way that it retains and deletes any personal information that it gathers in order to fulfil its responsibilities. It sets out :

* What personal data HOP will collect, and how;
* How data will be stored and kept;
* How long data will be retained, and when/how it will be deleted.

It is therefore particularly concerned with GDPR principles 3 (data minimization) and 5 (storage limitation), although it also describes certain aspects of how HOP ensures principle 6, (integrity and confidentiality – security).

HOP collects personal data through 3 main activities : collation of activity registers, conducting research and evaluation activities, and enquiries through the HOP website.

1. **What HOP Collects & Legal Basis :**

The GDPR requires us to establish a legal basis for processing personal data. For the purposes of this processing is covered under Article 6(1)a with consent for evaluation with students under 16 particularly for attainment raising activities. And GDPR Article 6 (1)(e) where processing is necessary for the performance of a task carried out in the public interest.

Where special category data is processed, the processing is covered under GDPR Article 9 (2) (g) where processing is necessary for reasons of substantial public interest, on the basis of Union or Member State 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, and Schedule 1, Part 2 (8) of the Data Protection Act 2018 where processing is necessary for the purposes of identifying the existence or absence of equality of opportunity or treatment between groups of people specified in relation to race, ethnicity and health with a view to enabling such equality to be promoted or maintained.

For this majority of activities, HOP collects the following student data :

Shared Personal Data shall be confined to the following categories of information relevant to the following categories of data subject

* Personal information including your name, postcode and date of birth
* Personal characteristics including gender, ethnicity, disability and/or health
* Whether the data subject’s immediate family has been to university
* Whether parent(s) have served in the Armed Forces
* Whether the data subject has ever been in care or considers themselves as a young carer
* Attainment-related information such as predicted grades and exam outcomes
* Pupil Premium and Free School Meal status
* Provision of data on learner profiles such as personal characteristics and changes in progress
* Whether the individual is estranged from family.
* whether the individual is/has been in local authority care (looked after status).
* whether the individual is a refugee or asylum seeker.

1. **Student data collected via Activity Registers :**

The most significant way in which HOP collects and processes personal student data is through the collation of activity registers from schools & colleges.

To ensure the security of personal data on registers, a secure Teams folder is set up and allocated to each institution which may only be accessed by their allocated HOP Engagement Coordinator, the HOP Data & Evaluation Assistant (who is responsible for checking and uploading registers to the HEAT database), and the nominated contact/s (maximum of 2 persons) within that institution[[1]](#footnote-1).

HOP will conduct an audit of all such school/college folders on Teams at the end of each academic term and ensure that any activity register which was received 12 months or more ago is permanently deleted from Teams.

As per the data sharing agreement set out in HOP’s grant offer letters to institutions, and the privacy notice shared with activity beneficiaries, personal data from registers is uploaded to the HEAT (Higher Education Activity Tracker) database. Arrangements for the retention and deletion of this data then fall under HEAT’s own retention and deletion policy as set out in its privacy policy which can be accessed via this weblink : <https://heat.ac.uk/privacy-notice/>

As per the data sharing agreement set out in HOP’s engagement grant offer letters to institutions, and the privacy notice shared with activity beneficiaries, personal data from registers is shared by the HEAT service with the Higher Education Statistics Agency (HESA). HESA is a Government body which collects, quality assures and analyses student information, including using this information to track students’ progress into Higher Education. Arrangements for the retention and deletion of this data then fall under HESA’s own retention and deletion policy as set out in its privacy policy which can be accessed via this weblink :

<https://www.hesa.ac.uk/about/website/privacy>

1. **Student data collected through evaluation activities :**

HOP is also required by OfS to conduct qualitative evaluation activities to collate evidence on ‘what works’ in widening participation activity, and why. To achieve this, the HOP Evaluation team may carry out a range of activities with learners to collect attitudinal data and data on ‘distance travelled’ as a result of our activities, including :

* Surveys & Questionnaires;
* Focus groups;
* Student panels;
* Workshops;
* Interviews, (including those captured on video and/or audio recording);
* Intercepts.

In order to meet the principles of the GDPR, we will adopt the following policy on the retention and deletion of personal data gathered through evaluation activities :

Any personal data collected by HOP via any of the means set out above will be anonymized within 13 weeks of the end of the data collection exercise. Original hard copies of survey or interview responses, focus group, panel or workshop reports and any associated scanned images will be held securely, under appropriate safeguards such as secure (limited access) Teams file and/or password-protected documents. With the exception of data collected for the purpose of longitudinal research (see below), this data may be held for up to 12 months after the end of the evaluation exercise in question, before being securely destroyed.

In the case of non-longitudinal research, personal data, and any data that has any traceability back to an individual survey or interview response will be destroyed within 12 months of all research outputs being delivered.

In the case of longitudinal research (eg. over a period of several years), data may be retained longer than 52 weeks only in cases where the participant has given express consent for their data to be retained for a specified longer period. In this case, all personal data and data that has traceability back to an individual will be destroyed within 52 weeks of the final research outputs being delivered.

Anonymised data may be held indefinitely by HOP.

1. **Personal data received via the HOP website :**

The HOP website provides the facility for anyone visiting the site to send an enquiry about our work and services to a general ‘HOP Info’ email address. Any enquiries received by HOP via this route will constitute personal data, because as a minimum an email address is categorized as personal data under the GDPR. Such enquiries can only be accessed by the HOP Marketing and PR Coordinator, and will be deleted within a maximum of six months of the enquiry being dealt with.

**Right to Erasure :**

HOP is aware of the new ‘Right to Erasure’ (sometimes called the ‘Right to be Forgotten’) obligation under the GDPR and will respond to any such request from a data subject in a way which reflects their rights under GDPR, including any exemptions, response timeframes and notification responsibilities. (Data collected under Public Task is exempt from the Right to Erasure, whereas data collected under Consent is not).

**Responsibility for this Policy and its Review :**

The person within HOP responsible for ensuring that this policy is kept up to date, and that all staff are aware of their responsibilities under it, is currently Naomi Prendergast Head of Coollaborative Outreach & access. This policy will be reviewed on an annual basis, unless legal or other regulatory changes make an earlier review necessary.

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**Date due for Review :** August 2026.

1. From early 2024, the secure Box system is being replaced by OneDrive at the University of Hull. Individual school and college folders referenced here will be moved to OneDrive. [↑](#footnote-ref-1)