

**Privacy Notice:  
Schools Outreach and  
Widening Participation**



Schools Outreach and Widening Participation (SOWP) perform a valuable role in driving forward Durham University's commitment to fair access. To deliver successful events and activities, the SOWP office processes personal data. Please read the privacy information below – Part 1 comprises Durham University's Generic Privacy Notice and Part 2 comprises privacy information specific to the activities of SOWP.

## **PART 1 – GENERIC PRIVACY NOTICE**

Durham University's responsibilities under data protection legislation include the duty to ensure that we provide individuals with information about how we process personal data. We do this in a number of ways, one of which is the publication of privacy notices. Our privacy notices comprise two parts – a generic part and a part tailored to the specific processing activity being undertaken.

### **Data Controller**

The Data Controller is Durham University. If you would like more information about how the University uses your personal data, please see the University's [Information Governance pages](#) or contact email: [info.access@durham.ac.uk](mailto:info.access@durham.ac.uk)

### **Data Protection Officer**

The Data Protection Officer is responsible for advising the University on compliance with Data Protection legislation and monitoring its performance against it. If you have any concerns regarding the way in which the University is processing your personal data, please contact the Data Protection Officer:

Andrew Ladd  
Email: [info.access@durham.ac.uk](mailto:info.access@durham.ac.uk)

### **Retention**

The University keeps personal data for as long as it is needed for the purpose for which it was originally collected. Most of these time periods are set out in the University Records Retention Schedule.

### **What we use your data for**

You have the right to be provided with information about how and why we process your personal data. We will only process data where we have a lawful reason to do so our main reasons are as follows:

<b>Lawful Basis</b>	<b>Purpose of Processing</b>
Contract	As part of agreements between us, we will process personal data for: <ul style="list-style-type: none"><li>• Admission to the university, registration and support for your studies.</li><li>• Academic assessment and progression.</li></ul>

Lawful Basis	Purpose of Processing
	<ul style="list-style-type: none"> <li>• Maintaining an academic record including qualifications.</li> <li>• Providing access to services including IT, Library and other facilities.</li> <li>• Providing ID for security purposes.</li> <li>• Administration of payments such as fees.</li> <li>• Providing reports to your sponsor (if any) including Student Loans Company.</li> <li>• Administration of complaints, disciplinary processes and other similar processes.</li> <li>• Provision of accommodation, catering and other services related to accommodating you.</li> </ul>
Public Task	<p>We carry out a number of tasks in the public interest including:</p> <ul style="list-style-type: none"> <li>• Research.</li> <li>• Archiving.</li> <li>• Diversity Monitoring.</li> <li>• Managing public health risks.</li> <li>• Managing risks related to public safety or concern to the local community (including reporting crime where we are not required to do so but it is in the public interest to do so).</li> </ul>
Legal Obligation	<p>We are a regulated body which means we are required to collect certain information including for:</p> <ul style="list-style-type: none"> <li>• Compliance with tax and immigration requirements.</li> <li>• Providing census and fee information.</li> <li>• Supporting local authorities on fraud investigation, electoral registration and council tax collection.</li> <li>• Reporting to the Office for Students and other regulators.</li> <li>• Reporting crime (where we are required to do so).</li> </ul>
Legitimate Interests	<p>We will process data where it is in our legitimate interests to do so including:</p> <ul style="list-style-type: none"> <li>• To improve the services we provide to you including organising events that may interest you.</li> <li>• To provide information to you about goods or services we offer.</li> <li>• To support marketing and brand related activity (which may include collecting some data about brand from social media and that might incidentally include personal data).</li> <li>• Photographing and recording events around the University including seminars for both training and marketing purposes.</li> </ul>

Where you have the choice to determine how your personal data will be used, we will ask you for consent. Whenever you give your consent for the processing of your personal data, you receive the right to withdraw that consent at any time.

In addition, we may provide you with a privacy notice in relation to specific uses of your data where this is appropriate. A privacy notice is a verbal or written statement that explains how we use personal data.

### **Sensitive personal data**

Some of the information we collect is sensitive personal data (also known as special categories of data). In particular, we may process personal data that relates to your health (such as your medical information for example to help support you), and any criminal convictions and offences (for reasons of safeguarding). If we use sensitive personal data, we will usually do so on the legal basis that it is in the wider public interest (for example in relation to research), to establish, take or defend any legal action or, in some cases, that we have your permission (consent).

## **How we collect your data**

Most of the personal information we process is provided to us directly by you. Often this will be actively provided by you for example by you filling in a form. In other situations your data may be gathered with less active participation by you, for example we may record a Teams video call for business or research purposes, or capture device ID for technical reasons when connecting with the University network. You will be provided with notification of this.

We may also receive personal information indirectly:

- For the purpose of student admissions and ongoing administration sources, include UCAS, funding bodies such as the Student Loans Company, US Loans, parents/guardians and schools/colleges.
- For the purpose of support sources, including: medical, health care professionals, psychologists, psychiatrists or those providing you with evidence of your disability or mental health.
- For the purpose of conducting research data set sources might include: data in the public domain including from the internet, data from domestic and international governmental bodies including Department for Health, Department for Education, local authorities, other Universities. We may also use research data we collected ourselves for one project for another research project.

When we obtain personal data about you from third party sources, we will look to ensure that the third party can lawfully provide us with your personal data.

We may also share information with the same set of organisations for the purposes mentioned above.

## **Data handling**

Where we are processing data using common cloud-based services or platforms (examples might include: Google, Skype, Teams or Zoom) it is possible a transfer of data outside of the EEA or UK may take place. In such cases appropriate protections will be in place (such as contractual arrangements designed to protect data).

We will also anonymise data, where it does not interfere with the reason for us handling the data, as soon as possible. For example: research participant data in large scale surveys will usually be anonymised as soon as possible after collection.

Research participant data will normally be anonymised if published however there will be some exceptions. Exceptions will be explained to participants where they apply for a particular project.

## **Accessing your personal data**

You have the right to be told whether we are processing your personal data and, if so, to be given a copy of it. This is known as the right of subject access.

You can find out more about this right on the University's Subject Access Requests webpage. Right to rectification If you believe that personal data we hold about you is inaccurate, please contact us and we will investigate. You can also request that we complete any incomplete data. Once we have determined what we are going to do, we will contact you to let you know.

## **Right to erasure**

You can ask us to erase your personal data in any of the following circumstances:

- We no longer need the personal data for the purpose it was originally collected.

- You withdraw your consent and there is no other legal basis for the processing.
- You object to the processing and there are no overriding legitimate grounds for the processing.
- The personal data has been unlawfully processed.
- The personal data has to be erased for compliance with a legal obligation.
- The personal data has been collected in relation to the offer of information society services (information society services are online services such as banking or social media sites). Once we have determined whether we will erase the personal data, we will contact you to let you know.

### **Right to restriction of processing**

You can ask us to restrict the processing of your personal data in the following circumstances:

- You believe that the data is inaccurate and you want us to restrict processing until we determine whether it is indeed inaccurate.
- The processing is unlawful, and you want us to restrict processing rather than erase it
- We no longer need the data for the purpose we originally collected it, but you need it to establish, exercise or defend a legal claim and
- You have objected to the processing and you want us to restrict processing until we determine whether our legitimate interests in processing the data override your objection.
- Once we have determined how we propose to restrict processing of the data, we will contact you to discuss and, where possible, agree this with you.

### **Making a complaint**

If you are unsatisfied with the way in which we process your personal data, we ask that you let us know so that we can try and put things right. If we are not able to resolve issues to your satisfaction, you can refer the matter to the Information Commissioner's Office (ICO). The ICO can be contacted at:

Information Commissioner's Office  
 Wycliffe House  
 Water Lane  
 Wilmslow  
 Cheshire  
 SK9 5AF  
 Telephone: +44 (0)303 123 1113  
 Website: [Information Commissioner's Office](#)

(Updated January 2025)

## **PART 2 – PRIVACY NOTICE FOR SCHOOLS OUTREACH AND WIDENING PARTICIPATION (SOWP)**

This section of the Privacy Notice provides you with the privacy information that you need to know before you provide personal data to Schools Outreach and Widening Participation (SOWP) for the particular purpose(s) stated below.

### **Type(s) of personal data collected and held by Schools Outreach and Widening Participation and method of collection:**

The information we hold includes personally identifying data such as your name, contact details, educational information, and information relevant to any relevant eligibility and

selection criteria for the programme you have applied to or is connected to you, for example additional contacts such as parents/carers of applicants/participants. This may be collected from your application to, or any other subsequent request in paper or electronic format connected to your participation on, a programme or event at Durham University and includes:

- **Full name(s), preferred name(s), chosen pronouns.**
- **Contact details including phone number(s), email address, postal home/postal address.**
- **Date of birth.**
- **Gender, gender identity, and/or legally assigned (biological) sex.**
- **Postcode and contextual data including POLAR quintile data, TUNDRA quintile data, and ACORN category data that is obtained using your postcode.**
- **Other personal details including ethnicity, disability, Free School Meal eligibility and whether you are one or more of the following: young adult carer, service child, whether you are estranged, care-experienced, or classified as independent, and whether you are a refugee or have asylum seeker status.**
- **Details of your family experience of higher education.**
- **Details of activities or events you have taken part in with Durham University.**
- **Medical details, including accessibility requirements, dietary requirements, or other health related details.**
- **GP details and address.**
- **Parent/carer/safeguarding and emergency contact details.**
- Identifying information related to university applications such as UCAS personal ID number.

Depending on the initiative, certain personal data (in bold above) will be entered into and stored in the Higher Education Access Tracker (HEAT). You will be informed if this is the case at the point at which you supply information for example when completing application forms or similar. For more information about HEAT see below and on page 6 of this document.

## **Lawful Basis**

The legal basis relied upon to process your personal information is that of legitimate interest and public task. Schools Outreach and Widening Participation (SOWP) needs to evidence the reach and effectiveness of its programmes to funders/donors (e.g. The Sutton Trust, The Office for Students), partners (e.g. The Brilliant Club, The Elephant Group, and other universities with which we are formally partnered), and external organisations as required by law and to comply with regulatory requirements as a University, such as those determined by the Office for Students and organisations such as HESA. As part of its commitment to fair access and widening participation, the University also aims to demonstrate the impact of its programmes on fair access and widening participation over time through activities that would constitute research and/or diversity monitoring (public task).

## **How personal data is stored by Schools Outreach and Widening Participation:**

Personal data is stored on our internal Computer Information Service (CIS) managed secure server, behind a firewall with access restricted by user permissions. This includes records created and housed within the University's relevant systems such as customer relationship management systems and student record systems. Personal data may also be stored in hard-copy (paper format), which is held in locked draws/filing units. Additionally, some personal data, where appropriate, may be stored on the Higher Education Access Tracker (HEAT Database) of which Durham is a member. For further details of the HEAT Data Protection Policy and Privacy Notice, please see [durham.ac.uk/visit-us/schools/access-engagement/policy-zone/](https://durham.ac.uk/visit-us/schools/access-engagement/policy-zone/). For more information about what the HEAT Database is and how your data is used, please see page 7 of this document.

## **How personal data is processed by Schools Outreach and Widening Participation:**

We will use contact information provided to communicate relevant information to participants, for example information about current or future events and activities at Durham University.

We will use educational information and information provided relevant to any eligibility and selection criteria to inform the selection process for the relevant programme, including relevant admissions processes that may result from attendance at one or more programme.

Additionally, SOWP needs to evidence the reach and effectiveness of its programmes to funders/donors and external organisations as required by law. As part of its commitment to fair access and widening participation, the University also aims to demonstrate the impact of its programmes on fair access and widening participation over time and any information collected by us may be used for evaluation and monitoring purposes.

## **Who Schools Outreach and Widening Participation shares personal data with:**

### Within Durham University

We will only share data securely within Durham University for relevant student administration mechanisms for example for admissions processes and/or arranging financial support. We will also share relevant data within the University, for example to relevant departments involved in the successful operation of student recruitment, widening access, outreach, and student support activities delivered by Durham University, which includes but is not limited to Event Durham, our Colleges, and our academic departments.

### Schools and Colleges

Our events and activities are often planned in conjunction with schools and colleges for planning purposes and verification purposes. For example, applications to our summer schools and other residential activities may need to be verified by the applicant's school or college. This means we may need to check that information we receive is correct. We will only share identifying personal data with participants' own school or college. The basis for exchanging data with schools or colleges varies by programme but this will only take place where there is a separate data sharing agreement in place between the University and your school or college, or where you have provided consent (such as in an application form, as above).

Please note: teachers, advisors, and other school-based contacts may also provide their personal data to Durham University from time to time. This data is not covered by this privacy notice and individuals should refer instead to Durham University's privacy information online at: [dur.ac.uk/ig](https://dur.ac.uk/ig).

### Higher Education Access Tracker (HEAT) service

Durham University subscribes to the Higher Education Access Tracker (HEAT) service, which is a self-sustaining organisation, financed purely by subscribing members. In order to meet the aims of evidencing the reach and effectiveness of its programmes to funders/donors and external organisations, SOWP collect participant data and input this into the secure online HEAT database.

The personal data input into the HEAT database includes participants' names, home postcode, date of birth, gender, ethnicity, and contextual information relevant to the University's fair access aims including eligibility for free school meals, caring responsibilities, parent/carer service in the regular armed forces, time spent in care and/or family estrangement, refugee or asylum seeker status, family experience of higher education, and details of impairments, health conditions, disabilities or learning differences.



We recommend that participants of our programmes read the HEAT data protection and privacy policy and protocol for storing and processing member queries. These documents are accessible at [durham.ac.uk/visit-us/schools/access-engagement/policy-zone/](https://durham.ac.uk/visit-us/schools/access-engagement/policy-zone/).

#### Other third parties

Personal data will not be shared outside of the University (to a third party), without prior written consent. For example, participants may have given us consent to share information with parent(s)/carer(s) or with their school. Personal data may be shared with third party suppliers where necessary for the provision of services in connection with events or activities operated by Durham University that you are attending, for example to travel partner(s) such as Key Travel to facilitate the purchase of train tickets and the delivery of tickets to you. Where this is the case, you will be provided with the opportunity to give your consent prior to any data sharing taking place, typically via email or an online form, often at the same time as you make a request for, or agree to, the provision of such services.

Participants attending a Sutton Trust summer school may have provided consent to us through their application to share the outcome of their application with the Trust.

#### Online Platforms

If you are taking in part in online activities such as webinars or event registration platforms, including but not limited to Microsoft Teams and/or Events Air, we may need to add details such as your name and email address to those platforms, and therefore sharing that data with the provider(s) of that platform, in order to give you access. We will only do this with your consent.

Users of any such platform are responsible for ensuring they have read, understood, and agree to the privacy policies and any other terms or conditions of use associated with those platforms. In any such instance, it is likely that users of those platforms will need to register for an account with the platform directly. Users will be responsible for their own data and security insofar as that account is concerned. However, please note that some of your personal details, such as your name and email address, may be visible to other users with access to the same “team”, “channel”, or “area” of the platform, including fellow student participants, academic staff, and current student ambassadors.

#### **How long personal data is held by Schools Outreach and Widening Participation:**

Personal data is held by SOWP for as long as is necessary to fulfil the purposes we collected it, which includes satisfying any legal, accounting, or reporting requirements. This also includes an ongoing need to carry out evaluation and monitoring, for which please be aware that the length of time may vary depending on your age or school stage at the time data has been provided as monitoring may be required up until you attend or graduate from university.

Personal data that is not required for evaluation or monitoring purposes will be held by SOWP for up to five years following the completion of the event or activity, in line with the University's Records Retention Schedule.

Once personal data is no longer required it is reviewed and will be destroyed or anonymised as appropriate. For example, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

#### **How to object to Schools Outreach and Widening Participation processing your personal data:**

Participants can object to their data being processed by SOWP. Objections can be raised by contacting SOWP in writing to the **Head of Widening Access & Participation, Durham University Palatine Centre, Stockton Road, DH1 3LE**. Alternatively, objections can be

raised by email to the relevant programme, as indicated in the programme documentation or to [access.participation@durham.ac.uk](mailto:access.participation@durham.ac.uk).

#### **Visitors to our websites/webpages:**

SOWP may make use of the Google Analytics service to understand the ways in which visitors to our webpage navigate around our site. We recommend that participants read Durham University's Website Cookie Usage Policy:

<https://www.dur.ac.uk/about/cookies/>.

#### **Use of cookies by Schools Outreach and Widening Participation:**

SOWP do not use cookies except if making use of Google Analytics. However, visitors to any of our webpages may easily navigate to other Durham University webpages. We therefore recommend that participants read the cookie policy (above).

#### **Links to other websites:**

SOWP may provide links to other useful sources of information via its webpages. We recommend participants and other visitors to our webpages take the time to locate and read the relevant privacy notice of such other websites.

#### **Changes to this privacy notice:**

This notice was last reviewed in April 2025 and is reviewed annually.

#### **Further information:**

Should you require further information, please contact [access.participation@durham.ac.uk](mailto:access.participation@durham.ac.uk).