

HEAT Data Protection Policy

This document provides contextualised information supporting the HEAT [Privacy Notice](#)

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1. Introduction

The [HEAT Privacy Notice](#) details the lawful basis for using personal information, why it is collected, what is collected and where from. It details how this personal information is processed, who it is shared with and how long it is retained for. The purpose of this document is to support the [HEAT Privacy Notice](#) by providing supplementary contextual information regarding data protection.

2. Context and Scope

The Higher Education Access Tracker (HEAT) Service is funded through a subscription model, strategically governed by its members. The Membership initially consisted of Higher Education Providers (HEPs), with the model since expanding to accommodate other providers, including Further Education Colleges and carefully selected non-profit making organisations. Subscribing members contribute data to, and have access to, the HEAT Database and Services.

Under the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR), the University of Kent and the HEAT Service¹ have a legal duty to safeguard personal data collected for the legitimate purposes of the HEAT Service, and to exercise fully the responsibility in respect to the rights, freedoms and privacy of those individuals whose data is held.

Membership of the HEAT service is dependent upon participating universities and organisations entering into a legal HEAT Service Member Agreement (Agreement) with the University of Kent, which governs delivery, access and use of the HEAT Service. The Agreement details the mutual contractual obligations and legal accountabilities of the parties, alongside an expectation of minimum compliance standards.

The Agreement confirms that the relationship between the member and the HEAT Service is **Data Controller to Data Controller**, namely that each Data Controller independently determines the purposes for which it is using personal data.

HEAT is responsible for:

- Security when storing, processing and transferring data
- Sharing personal data with administrative agencies for the purpose of Tracking outcomes
- HEAT outputs, including national datasets

Members are able to use the HEAT Services defined in the Agreement in compliance with HEAT's, and its own, personal data policies and procedures. Individual members are responsible for:

- Individual privacy notices, ensuring this includes [both Privacy Notices produced by HEAT and HESA as set out in Section 10](#)
- Individual data collection and administration

¹ Though pertaining specifically to the collection and processing for the purpose of delivering the HEAT Service to subscribing members, the HEAT Service Data Protection and Privacy Notice is underpinned by the [University of Kent's Data Protection Policy](#).

- Complying with all applicable requirements within this Data Protection Policy and the Agreement
- Complying with JISC/HESA's Terms and Conditions of use in relation to linked HESA data
- Adhering to all data source suppression, rounding and publication policy
- Data retention schedule implementation

3. Purposes for which personal data is processed

HEAT processes Personal Data and Special Category Personal Data (SCPD), collected by its members and obtained from other sources, to provide the HEAT Services defined in the Agreement. The HEAT Services are categorised into three stages: Planning & Design, Activity Implementation, and Analysis & Reporting. Throughout each of the three stages, the profiling of individuals provides members with what they need to monitor and evaluate equality of opportunity programmes. These programmes are intended to assist equality of opportunity for certain groups, thus individuals added to the HEAT database are profiled to assess the extent to which they belong to designated target groups. Profiling, attendance information and additional data from other sources enables HEAT members to:

- Deliver and Implement equality of opportunity activities
- Monitor whether resource has been targeted effectively
- Evaluate the impact on those for whom equality of opportunity policies were intended

It is important to clarify that profiling is applied, but not limited to, delivering focused and targeted activities and recording individual participation. Reporting and analysis based on profiled data are provided to HEAT members and individual profiling can be undertaken to monitor and evaluate equality of opportunity programmes.

4. Purposes outside the efficient monitoring and evaluating of the effectiveness of equality of opportunity programmes

4.1 Member purposes

As set out in the Agreement², members are permitted to upload personal data to the HEAT system in connection with the HEAT Core Service and other HEAT related services, for the purposes of Planning & Design, Activity Implementation, and Analysis & Reporting of equality of opportunity activities.

Members may have their own purposes for which they may wish to process personal data. Personal data uploaded to the database, which is not required in connection with the HEAT Core Service and other HEAT related services as set out in the Agreement, shall be the sole responsibility of the member, as Data Controller, who will process the personal data it has collected for its own purposes in compliance with its own personal data policies and procedures. Each member must ensure it has a lawful basis according to UK GDPR to upload such data onto the HEAT database.

² Schedule 2, HEAT Service Member Agreement

4.2 Member-to-Member data sharing

Members may wish to work in direct collaboration with another member or members and may wish to share personal data as part of this. When such data is stored within the HEAT database, it is the responsibility of the members involved, as Data Controllers, to process the personal data they have collected for their own purposes in compliance with HEAT's, and their own personal data policies and procedures. For example, by each member signing and adhering to a suitable Data Sharing Agreement, and ensuring appropriate privacy notices are in place, and that it has a lawful basis according to UK GDPR to upload such data onto the HEAT database.

4.3 Independent research by third parties

The HEAT Service may, from time to time, enable selected third parties to access and use its data to conduct research. A Research Request Protocol is administered, which sets out the terms and conditions under which requests to use the aggregate data for research is approved. It details the steps taken to:

- Comply with UK GDPR law
- Protect the HEAT Service and its members from publication of misleading analysis of released data
- Protect the privacy of members and their data subjects
- Safeguard personal information

5. Supplementary information regarding the lawful basis for processing personal information

5.1 UK GDPR and public authorities

Most UK universities are public authorities³ for the purposes of the UK GDPR, as set out in section 7 of the Data Protection Act 2018. Although the overarching function is primarily to educate, universities are also statutorily required to demonstrate financial integrity and performance accountability, particularly relating to educational outcomes, therefore certain university activities are deemed to be tasks necessarily carried out 'in the public interest'. Guidance from the Information Commissioner's Office (ICO) in relation to the "tasks in the public interests" condition highlights that:

- "Organisations do not need a specific statutory power to process the personal data, but their underlying task, function or power must have a clear basis in law"⁴
- "The relevant task or authority must be laid down by domestic law...this does not have to be an explicit statutory provision, as long as the application of the law is clear and foreseeable"⁵
- "Organisations do not need specific legal authority for the particular processing activity. The point is that their overall purpose must be to perform a public interest task...and that overall task or authority has a sufficiently clear basis in law"⁶

The Higher Education and Research Act (HERA) 2017 outlines, under the Access and Participation section of the Act, the requirements of Access and Participation Plans (APPs).

³ Members who are not public authorities (e.g. other education providers or engagement providers) can rely on the legitimate interests condition. Such Members should complete and retain Legitimate Interests Assessments (LIAs) to support their reliance on this condition.

⁴ Guide to the General Data Protection Regulation, 01 January 2021 v1.1.155, ICO, p.76.

⁵ Ibid, p.77.

⁶ Ibid, p.77.

Section 32⁷ of the Act obliges institutions to include in their APPs provisions relating to the promotion, monitoring and maintenance of equality of opportunity. In summary, the provisions:

- Require the governing body of the institution to take, or secure the taking of, measures to attract applications from prospective individuals who are members of groups which, at the time when the plan is approved, are under-represented in higher education
- Set out objectives relating to the promotion of equality of opportunity
- Require the monitoring by the institution of its compliance with the provisions of the plan and its progress in achieving any objectives set out in their APP
- Requiring the provision of information to the Office for Student (OfS)⁸

Relying on Public Task (Article 6(1)(e)) as the lawful basis has been considered and supported by Data Protection Counsel.⁹ The lawful basis of a task carried out in the public interest is therefore applicable to data collected and processed by the HEAT Service to support its member universities, in terms of enabling them to meet their statutory obligation to evidence

⁷ Higher Education and Research (HERA) Act 2017, Section 32: Content of a plan: equality of opportunity

(1) An access and participation plan relating to an institution—

(a) must also include such provisions relating to the promotion of equality of opportunity as are required by regulations made by the Secretary of State to be included in the plan, and

(b) may also include further provisions relating to the promotion of equality of opportunity.

(2) In this section, any reference to the “general provisions” of an access and participation plan is a reference to the provisions included in the plan by virtue of subsection (1).

(3) The general provisions that may be required by regulations made under subsection (1) include, in particular, provisions—

(a) requiring the governing body of the institution to take, or secure the taking of, measures to attract applications from prospective students who are members of groups which, at the time when the plan is approved, are under-represented in higher education,

(b) requiring the governing body of the institution to provide, or secure the provision of, financial assistance to students,

(c) requiring the governing body of the institution to make available to students and prospective students information about financial assistance available to students from any source,

(d) setting out objectives relating to the promotion of equality of opportunity,

(e) relating to the monitoring by the governing body of the institution of—

(i) its compliance with the provisions of the plan, and

(ii) its progress in achieving any objectives set out in the plan by virtue of paragraph (d), and

(f) requiring the provision of information to the OfS.

(4) Regulations under subsection (1) may not require a plan—

(a) to include among the general provisions of the plan any provision referring to particular courses or to the manner in which courses are taught, supervised or assessed, or

(b) to include any provision relating to the criteria for the admission of students.

(5) In this section—

(a) “equality of opportunity” means equality of opportunity in connection with access to and participation in higher education provided by English higher education providers, and

(b) references to higher education do not include education provided by means of any postgraduate course other than a course of initial teacher training

⁸ Office for Students, [Regulatory notice 1: Access and participation plan guidance](#)

⁹ See [HEAT Data Protection Counsel Paper](#)

effectiveness of such programmes to funders, education regulators such as (but not limited to) the Office for Students (OfS), and central Government.¹⁰

5.2 Purpose limitation – use of data for research

Most data used for the purposes outlined in the [HEAT Privacy Notice](#) will be collected for those reasons. However, members should be aware that data collected can be re-used for statistical purposes undertaken as part of the HEAT Service. This is because the “purpose limitation” principle contains specific provision for the re-use (“further processing”) of data for statistical purposes.¹¹

5.3 Lawful basis for processing data for non-HEAT Services

As noted in [Section 4](#), purposes outside the monitoring and evaluating the effectiveness of equality of opportunity programmes, members may be processing personal data for non-HEAT Services and should consider the most appropriate lawful basis for these purposes. Using personal data to send electronic Direct Marketing (such as the sending of promotional material via email or SMS) must only be done with the consent of the individual. This is a requirement of the Privacy Regulations.¹²

6. The lawful basis for processing Special Category Personal Data

There are two conditions outlined in the Data Protection Act 2018 that relate to the HEAT Service processing of Special Category Personal Data.

6.1 Equality of Opportunity¹³

This condition is met if the processing:

- a) Is of the following categories of personal data:

Category of personal data	Groups of people (in relation to a category of personal data)
Personal data revealing racial or ethnic origin	People of different racial or ethnic origins
Personal data revealing religious or philosophical beliefs	People holding different religious or philosophical beliefs
Data concerning health	People with different states of physical or mental health
Personal data concerning an individual’s sexual orientation	People of different sexual orientation

¹⁰ [UK GDPR Article 6\(1\)\(e\)](#): “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” and Data Protection Act 2018, Part 2 General Processing, Chapter 2 UK GDPR, Section 8: Lawfulness of processing: public interest etc [Data Protection Act 2018 \(legislation.gov.uk\)](#).

¹¹ UK GDPR Article 5(1)(b).

¹² Regulation 22, Privacy and Electronic Communications Regulations (PECR).

¹³ DP Act 2018 – Schedule 1, Part 2, 8(1), <https://www.legislation.gov.uk/ukpga/2018/12/schedule/1/paragraph/8/enacted>.

- b) 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
- c) Is not likely to cause substantial damage or substantial distress to a data subject
- d) Is not for the purposes of measures or decisions with respect to a particular data subject

HEAT considers that its processing meets these conditions.

6.2 Research

This condition is met if the processing:

- a) Is necessary for statistical purposes
- b) Is carried out in accordance with Article 89(1) of the UK GDPR and Section 19 of the Data Protection Act 2018, and
- c) Is in the public interest

HEAT considers that its processing meets these conditions. With regard to Article 89, HEAT considers that appropriate safeguards for the rights and freedoms of the individual are applied in [Section 7 Transparency](#).

7. Transparency

The [HEAT Privacy Notice](#) provides appropriate privacy information to all individuals about why the data is being collected, what it will be used for and their rights.

7.1 Technical and organisational measures

The security measures outlined in [Section 11.2](#) are deployed

7.2 Research utilising Special Category Personal Data

The Special Category Personal Data (SCPD) is processed for statistical purpose and is in the public interest, i.e., necessary to support its members to fulfil their public tasks, and specifically those outlined in the Higher Education and Research Act 2017. With regards to Section 19, the HEAT Service:

- Does not consider that its process of the SCPD will be likely to cause substantial damage or substantial distress to a data subject
- Does not process the SCPD for the purposes of measures or decisions with respect to a particular data subject

8. How data is obtained

HEAT members collect individual data, either:

1. Directly from individuals in their equality of opportunity work to improve access and success in higher education programmes, or
2. Indirectly from individuals, partner institutions and organisations, and other agencies with whom they collaborate for programme delivery

9. Data obtained by the HEAT Service about its Members

The HEAT Service uses its member data to administer the HEAT Service and does not disclose contact information to third parties. The HEAT database automatically collects all access and usage information, recording it in audit log files. Collection and processing of this log data is necessary to:

- Detect and prevent system abuse and unauthorised access
- Ensure the integrity and security of the database
- Evidence our commitment to technological security
- Identify and respond to technical issues or malfunctions
- Monitor and maintain access restrictions and protocols
- Monitor system functionality and maintain service levels

10. Ensuring fairness - Transparency

Members agree, as part of the Agreement, to provide full and clear information to anyone they collect Personal Data and/or Special Category Personal Data from and consult with the HEAT Service, upon request, about the privacy notices they provide to individuals.¹⁴

Any privacy notice provided to data subjects shall include the appropriate notice to individuals produced by HESA and available at <https://www.hesa.ac.uk/about/regulation/data-protection/notices#linkg> and the Co-ordinating Institution's HEAT Privacy Notice available at <https://heat.ac.uk/privacy-notice/>.

11. Data Security

[Article 32 of the UK GDPR](#) considers the security of processing personal information. When determining what measures to put in place, the HEAT Service has considered:

- The state of the art
- The cost of implementation
- The nature, scope, context and purposes of processing
- The varying likelihood and severity of risk to the rights and freedoms of natural persons posed by the processing

11.1 Members

Members agree, as part of the Agreement, to

- Adhere to a set of Good Data Management and Research Practices¹⁵
- Ensure it has in place appropriate technical and organisational measures to protect against Personal Data Breaches¹⁶

¹⁴ Schedule 5, 3b and 5a of the Agreement

¹⁵ Schedule 3 of the Agreement

¹⁶ Schedule 5, 3f of the Agreement

11.2 The HEAT Database

The HEAT Service keeps a Technical Compendium outlining the technical and organisational measures put in place to ensure that personal data is protected. It includes information on how the HEAT Service manages:

- Cybersecurity
- Encryption
- Physical security
- Passwords and access rights
- System updates

The HEAT Service maintains and operates:

- An information security policy
- A business continuity plan (BCP)
- Risk assessment via Data Protection Impact Assessments (DPIAs)
- Awareness and training
- Due diligence

Security measures for the HEAT Database are regularly reviewed and kept up to date.

11.3 Where personal information is stored

All personal information on the HEAT database, including backups and audit logs, is stored on servers located within the United Kingdom.

11.4 The HEAT Service processing of data outside the HEAT Database

The HEAT Service adheres to its Data Management Protocol, which sets out the procedures that the HEAT Service follows to mitigate cyber threats and protect member data alongside the procedures to follow when processing personal information. Additionally,

- The transferral of personal information is kept to a minimum. When transferring is necessary, this transaction is completed via the HEAT Database File Store or Microsoft One Drive with need-to-access permission.
- For the purpose of accessing DfE data, HEAT staff must:
 - Have a [Disclosure and Barring Service check](#)
 - Be an [accredited Safe Researcher](#)

11.5 Access to data by HEAT

The Technical Compendium outlines the management of user access, including:

- The HEAT Service staff need-to-access policy
- Third party contractor access required to operate the HEAT Service

11.6 Access to data by Members

The Technical Compendium outlines the management of user access, including:

- How members can manage individual user access
- How designated member staff can set the access for their staff
- How individual members consider and define whether a user needs access (and what level of access) to data, to fulfil their role at the member level

11.7 HEAT Staff training

All HEAT Service staff undertake mandatory data protection awareness training through the University of Kent staff training programme, with supplementary training specific to the requirements of their individual roles. Annually, HEAT Service staff read the Data Management Protocol and declare that they understand and accept the conditions.

11.8 Data Protection by Design and Default

The HEAT Service will ensure that the principles of DPbDD are considered for all data collection and data use. The Technical Compendium outlines the HEAT Service deployment and release procedure from the design phase to membership release.

11.9 Data Protection Audit and Data Protection Impact Assessments

As a service which holds and processes large scale national level data of significant numbers of individuals, HEAT acknowledges its responsibility to undertake appropriate Data Protection Audits and Data Protection Impact Assessments (DPIAs) to inform its Data Protection Policy and Procedures.

The audits and DPIA processes will be used by the HEAT Service to:

- Describe its processing operations and purpose, i.e., the lawful basis for processing
- Monitor the necessity and proportionality of the processing in relation to the purpose
- Identify and assess potential risks to the rights and freedoms of data subjects
- Inform necessary measures to mitigate risk, including security, and to demonstrate compliance

11.10 Working with suppliers (Contractor and Consultancy Agreements)

Where the University of Kent and/or the HEAT Service decide to use an external organisation or consultant to (for example):

- Handle, process, cleanse or analyse personal data on our behalf
- Host or maintain systems
- Develop, test, or in any other way work on or have access to systems
- Undertake specific contracted projects or areas of work using personal data

It retains legal responsibility for ensuring security of the data and protecting the rights and freedoms of data subjects. In deciding appropriate security measures, the type of data, level of risk, available technology and the cost of ensuring data security, will be fundamental priorities.

Contractual arrangements by the HEAT Service with external organisations or consultants, are subject to extensive, legally binding Third-Party Agreements, which seek to ensure appropriate security measures in addition to compliance with the requirements of the Data Protection Act (DPA) 2018 and General Data Protection Regulation (UK GDPR).

Accordingly, the HEAT Service, in conjunction with the University of Kent, will take all reasonable precautions when outsourcing services, to select reputable organisations and consultants, utilising the expertise and guidance of the University of Kent's Information Compliance Officer and Information Services Requirements Team as appropriate.

12. The Data Retention Schedule

12.1 Retaining personal information

The HEAT Service is committed to demonstrating compliance with the data retention requirements of UK GDPR, whilst also prioritising the fundamental ethos and longitudinal

research purposes of HEAT. The two are not mutually exclusive thus, with carefully considered application of the research provisions contained in the UK GDPR and Data Protection Act 2018, and adherence to relevant University of Kent policies¹⁷, both essential areas are effectively and compliantly addressed. The Data Retention Schedule sets out the time limits and principles applied by the HEAT Service to the retention of personal data for the purpose of monitoring and evaluating the effectiveness of equality of opportunity programmes.

The [HEAT Privacy Notice](#) specifies the retention period that will be applied to personal data in the context of the Data Retention Schedule. The University of Kent and the HEAT Service have a legal duty to safeguard personal data collected for the legitimate purposes of the HEAT Service, and to exercise fully the responsibility in respect to the rights, freedoms, and privacy of those individuals whose data is held. The Data Retention Schedule applies specifically to legitimate use of the personal data of individuals who have interacted with a HEAT member organisation. It sets out the responsibilities of both the HEAT Service and member organisations, as a partnership, in adhering to the law regarding the retention of personal data for the research programme stated above. The HEAT Service is responsible for:

- Reviewing and amending this Schedule
- Providing members with the tools and resources required to implement it
- Informing Legal Leads of members who have not deleted records by 5pm on the last working day of November that HEAT will delete all outstanding records in the Retention Tool by 5pm on the last working day of each calendar year

The HEAT Service, under the jurisdiction of its host the University of Kent, is unable to allow members to leave records in the Retention Tool beyond the last working day of each calendar year. Individual member organisations are responsible for:

- Applying the Data Retention Schedule, and the tools and resources supplied by the HEAT Service, to comply with the law on the retention of personal data
- Deleting records in the Retention Tool once a year, at the latest by 5pm on the last working day of November of each year
- Time-periods applied by the Data Retention Schedule

12.2 Rationale for a longer period of data retention

The HEAT research programme (or ‘purpose for retaining data’) allows its members to monitor and evaluate their equality of opportunity programmes in terms of risks to equality of opportunity, attainment, progression and graduate outcomes, including employment. Impact research studies explore the effect that an individual’s participation on a programme has on their outcomes. Following advice from the ICO in 2020, a retention policy that is proportionate to the purposes of impact research and in line with the requirements of the GDPR was implemented. Counsel was sought in relation to data protection, the sharing of information, and the HEAT approach to compliance¹⁸.

¹⁷ <https://www.kent.ac.uk/about/governance/policies-and-procedures>

¹⁸ [HEAT Data Protection Counsel Paper](#)

12.3 Legal Anchors

Tracking for a longer period of 15 years allows HEAT to monitor and evaluate longer term outcomes. This retention timescale was determined by a research plan which includes investigating the impact of intervention(s) on outcomes such as post graduate study and employment. The following legal anchors underpin our tracking in the public interest.

- a. In relation to retention, we refer to the GDPR storage limitation principle Article 5(1)(e), which sets out that personal data shall be:

“(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (‘storage limitation’);”

- b. The Office for Students (OfS) under their regulation of Universities (Regulation Notice 1)¹⁹ asks providers to make provisions for how they will promote equality of opportunity as required by secondary legislation²⁰. The Higher Education Research Act (HERA) 2017²¹ sets out that a provider’s Access and Participation Plan (APP) must make provisions:

“relating to the monitoring by the governing body of the institution of—

- (i) its compliance with the provisions of the plan, and
- (ii) its progress in achieving any objectives set out in the plan by virtue of paragraph (d), and
- (f) requiring the provision of information to the OfS.

- c. Regulation Notice 1 also asks providers to help with raising attainment, a key predictor of progression and success in Higher Education, this steers providers towards more work with younger cohorts. They expect providers to look at:

“How they can address the risk posed to fair access and successful participation by knowledge, skill and attainment gaps emerging across childhood by making meaningful and effective contributions to supporting schools to raise pre-16 attainment”²².

- d. The OfS Equality of Opportunity Risk Register identifies a Risk that involves life cycle outcomes. They ask providers to consider risk and develop interventions where required to address any related inequalities for their student groups:

- Risk 12 Progression **from** Higher Education²³

They expand on this risk explaining that it leads to:

- low progression rates to further study

¹⁹ <https://www.officeforstudents.org.uk/media/12221897-d0d7-4f37-9c6d-4197db178cfd/regulatory-notice-1-access-and-participation-plan-guidance-march-2023.pdf>

²⁰ Clause 24 of regulatory notice 1

²¹ <https://www.legislation.gov.uk/ukpga/2017/29/section/32/enacted> see clause 32.

²² <https://www.officeforstudents.org.uk/media/12221897-d0d7-4f37-9c6d-4197db178cfd/regulatory-notice-1-access-and-participation-plan-guidance-march-2023.pdf> (clause 10, 23-28)

²³ <https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/equality-of-opportunity-risk-register/risk-12-progression-from-higher-education/>

- lower uptake of further study places
- higher proportion of students in 'over-qualified' positions
- lower salaries after a certain number of years
- graduate reflections in the Graduate Outcomes Survey

The OfS requires universities to evaluate the outreach they conduct with disadvantaged students, stating that "Tracking...provides useful longitudinal data as part of an evaluation"²⁴. For HEAT members to implement their Access and Participation Plans (APPs) and comply with the provisions set out in the Higher Education Research Act (HERA) 2017, research involving longitudinal tracking must be undertaken. The ICO recommended that HEAT implement a standard model for data retention and via consultation with HEAT members, including its Research Group, adopt a pragmatic and compliant model. This involved scoping out the number of years required to track students to gather outcome data to explore the impact of equality of opportunity programmes.

12.4 A longer period of data retention

The HEAT retention policy was set to 15 years in order to capture individuals on different trajectories and optimise the research dataset population. It is mindful of the following variables:

- Universities are being asked to work with younger year groups to help with raising attainment at KS4
- Risk groups of individuals do not come into Higher Education at 18 years and instead will enter between 19 and 21 coming via college education
- Individuals are studying for more than 3 years with a smaller cohort studying 5-6 years depending on breaks, placements, mode of study and subject
- Individuals going onto Post Graduate study may break from study after completion of their Degree
- HESA does not make available individual outcome data until at least 18 months after enrolment
- Graduate outcome surveys are not conducted until sometime after an individual completes their university study and this data is not made available to HEAT until the following academic year
- A proposal to link HEAT tracked records with the LEO would greatly assist the research of graduate earnings and gain insight into the impact of graduate employment by using more complete and robust data is underway at the time of writing. This would be a major step forward recognising that graduates can take some time after their studies to secure an established career post

It is recognised that the 15-year timespan accommodates the longest trajectory envisaged for an individual engaging in interventions until they are expected to enter HE. Table 1 below provides a timeline of progression points within the retention period. Its purpose is to illustrate an example of progression covering potential variables.

²⁴

https://www.officeforstudents.org.uk/media/8973/regulatory_advice_6_how_to_prepare_an_access_and_participation_plan_de_c2023.pdf (p58, paragraph 199)

Table 1: Representing Data Point and Trajectory Example of Individual Progression

Data Point and Trajectory	Data retained for
Year in which expected to enter HE	One year
Individual takes gap year(s) or defers entry	Two – Three years
Individual studies for 4-7 years (including Postgraduate)	Six – Ten years
HESA Data becomes available	Thirteen years
Individual graduate outcome data becomes available	Fifteen years

13. Changes to Policy and Procedure

This Policy and associated procedures are reviewed and ratified by the HEAT Governance Board in accordance with relevant guidelines.

Additional expertise, advice and scrutiny will be sought where necessary from the University of Kent, Data Protection Officer, and/or the Information Commissioner’s Office. As a service led by the University of Kent, the HEAT Service operates at all times under the University of Kent Data Protection Policy, therefore any revisions or updates to this document will be in accordance with the University of Kent policy review schedule.

14. Additional documentation from the HEAT Service

If you are interested in accessing further documentation, such as the HEAT Data Management Protocol, Data Protection Counsel, Service Member Legal Agreement, Research Request Protocol, or Technical Compendium, that support the [HEAT Privacy Notice](#) and its data protection policies, contact [HEAT Support](#).