

**Higher education institutions must provide the HEA Student Data Collection notice to their students.**

Article 13 of the General Data Protection Regulation requires information to be provided, or made readily available, to data subjects so that they are not deceived or misled as to the purposes for which their data is to be processed. In order to satisfy this principle, the HEA supply text for use by HEIs.

The student data collection notice can be supplied to students in any of the following areas:

- Providing the text with the registration form and the HEI's own data protection statement;
- Including the text on a website with the HEI's own data protection information;
- Including the text in a student handbook or other reference source for students.

## HEA Student Data Collection Notice 2018

### Who we are (data controllers)

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.

For the purpose of the Data Protection Acts 1988 and 2018 (as amended) and the General Data Protection Regulation (the GDPR) (the **Acts**):

- The HEA and the higher education institution are joint data controllers. 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.

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

- Student record system data (SRS) based on institution’s registration data;
- 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?

- Data from the voluntary Equal Access Survey, these are anonymised data;
- 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.

A list of all individual data items in Schedule 2 to this Notice.

## Why does the HEA collect this information?

The HEA uses this data 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 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:

- That you have provided consent for the processing for one or more specified purposes such as when you undertake one of our surveys;
- Processing necessary for compliance with a legal obligation to which the HEA are subject;
- Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the HEA as the controller by virtue of statutory functions as set out in the 1971 Act.

The legal bases for the processing of your special category data or sensitive data are:

- Processing necessary for compliance with a legal obligation to which the HEA are subject;
- Processing necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

## 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 (CDETb) and the Central Statistics Office for the following purposes:

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

The HEA will provide your student record to CDETb (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 CDETb (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.

HEA student data (PPSN, name, address, date of birth) is sent to the Department of Employment Affairs and Social Protection Client Identity Services to verify PPSN.

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. The HEA graduate data may also be linked to SOLAS, Quality and Qualifications Ireland (QQI), SUSI and State Examinations Commission (SEC) data in the Central Statistics Office.

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. These data do not on their own identify any individual:

- Equal opportunities monitoring - the HEA database may contain details of ethnic group and disability (anonymised). These data are only used where they are needed to promote or maintain equality of opportunity or treatment between persons of different racial or ethnic origins, or different states of physical or mental conditions;
- Research - this may be academic research, commercial research or other statistical research into education where this is of benefit to the public interest;
- Journalism, where the relevant publication would be in the public interest;

Anonymised aggregate data for the above purposes is supplied by the HEA to the following types of user:

- Local, regional and national Government bodies who have an interest in higher education;
- Higher education sector bodies;
- Higher education institutions;
- Academic researchers and students;
- Commercial organisations (e.g. recruitment firms, graduate employers);
- Unions;
- Non-governmental organisations and charities;
- Journalists.

Individuals cannot be identified from these anonymised aggregate data.

### **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 2018/19 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 2317105

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.

<i>Third party name</i>	<i>Description of services provided</i>
The Department of Education and Skills	The HEA share identifiable microdata with the Department of Education and Skills to allow for transitions rate analysis from 2 <sup>nd</sup> level to 3 <sup>rd</sup> level and to produce 3 <sup>rd</sup> 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. Insight Statistical Consulting to code Equal Access Survey socio-economic 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:

Blind or deaf indicator  
Physical disability indicator  
Learning disability indicator  
Psychological, emotional, or mental health indicator  
Other condition indicator  
Support requirement  
Father Principal Economic Status  
Father Occupation  
Father Employment Status  
Father Socio-economic Group  
Father Socio-economic Class  
Mother Principal Economic Status  
Mother Occupation  
Mother Employment Status  
Mother Socio-economic Group  
Mother Socio-economic Class  
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 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  
Relevance 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 qualification again indicator

Same area of study 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. Equal Access Survey data received by the HEA are anonymised and are not linked to individual student records in the SRS.