

GRADUATE OUTCOMES DATA USAGE GUIDANCE NOTE FOR FINAL PROVIDER DATA DELIVERY

INTRODUCTION

This operational guide provides information on how the final data delivery of survey response data may be used by providers. It is designed to be accessible to all types of higher education provider, including those who do not have Data Protection Officers or Data Protection teams.

The specification for the data to be provided is set out within the [C17072 Graduate Outcomes Survey Results coding manual](#).

Please note that:

- This final delivery also contains partial survey responses – these are individuals who have answered at least the first survey question but not enough questions to be treated as a complete response.
- This final delivery should not be shared more widely than your own provider until after HESA's statistical bulletin has been released.
- Only individuals who hold the role of Graduate Outcomes Survey Results user can download the final data delivery from within HESA's Graduate Outcomes [provider portal](#).
- HESA will shortly be deleting previous versions of the data that were available for download.

PERSONAL DATA

Upon receipt of the final survey response data, your organisation will become a Controller, must comply with all applicable data protection legislation and will be responsible for its compliant usage.

A Controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Therefore, it is important that before you download this data, your organisation must put in place appropriate processes to ensure that the survey response data is processed securely, in accordance with data protection legislation, the relevant privacy notice, your agreement(s) with HESA and taking into account the guidance in this note.

Given the above, there are restrictions on how the survey response data or information derived from it can be used. Your organisation's processes must ensure that any internal recipients understand the purposes for which they can process the data.

When considering use cases or whether and how to download the data, many organisations will undertake a Data Protection Impact Assessment (DPIA) to ensure that they have taken all relevant issues into account, including whether the data can be pseudonymised and if so, at what point. If it is not necessary for your organisation to download individualised data, anonymised aggregated data will be being published. Further guidance on DPIAs can be found on the [Information Commissioner Officer's website](#).

As an independent Controller, your organisation should determine how they will comply with these requirements. If you are unsure, we recommend that you speak to your Data Protection Officer or, if you do not have one, take specialist advice.

Please note that the final data delivery should not contain Special Category Personal Data as the subjective wellbeing question responses have been aggregated or suppressed where less than eight individuals have responded.

WHAT SHOULD WE DO WITH THE RAW GRADUATE OUTCOMES RESULTS DATA WE HAVE DOWNLOADED PRIOR TO THE FINAL DELIVERY?

Providers are reminded that the raw survey response data downloaded prior to the final delivery will not be accurate as amendments have been made to the final delivery data following the quality assurance work undertaken by HESA and its SIC and SOC coder. We are required under data protection legislation to remove access to data that is factually incorrect. Therefore, on 31 March 2020, providers will no longer have access to the 'SIC / SOC' or 'survey results' reports.

Please note that, as stated in the [outcomes of the SOC coding assessment](#), whilst HESA has worked hard to address any systemic errors identified by providers, it has not corrected individual issues raised and relies on the relevant statistical exemption under Schedule 2, Part 6, Paragraph 27 of the Data Protection Act.

Any raw results data downloaded prior to the final delivery should be deleted by providers to ensure compliance with data protection requirements. For example, Purpose 1 of the [Year 1 Graduate Outcomes Collection Notice](#) (referred to as the privacy notice on the Graduate Outcomes website) makes clear that the information downloaded prior to the final delivery will only be used by providers to monitor the progress of the survey. Secondly, the raw data you have downloaded may contain the survey results of data subjects who have since exercised their rights as data subjects to request that their survey results data be deleted.

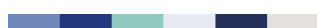
RE-ISSUE OF FINAL DELIVERY DATA

As with all HESA collections, further deliveries of the data may occur if the data previously delivered has been changed significantly. For Graduate Outcomes, such changes can be due to a number of reasons, including amendments made through the fixed database to other collections or because of changes being made to how derived fields are calculated.

Providers should note that the earlier delivery of the survey response data will no longer be accurate as amendments have been made to the final delivery data. Any downloads of the previous delivery data should be deleted by providers to ensure compliance with data protection legislation, including the requirement to ensure the accuracy of data being processed.

FINAL DELIVERY OF GRADUATE OUTCOMES DATA IS EMBARGOED UNTIL THE PUBLICATION OF THE RELEVANT STATISTICAL BULLETIN

This data is being supplied to you ahead of HESA's first release of Graduate Outcomes data (in the form of a Statistical Bulletin). Whilst we appreciate that you are likely to want to analyse this data and share findings with colleagues, we ask that you please do not share any of the content of this data more widely than your own provider until after HESA's statistical bulletin has been



released. This extends to sharing any indication of the content of the data including descriptions such as 'favourable' or 'unfavourable'.

HESA is an official statistics producer and as such is statutorily obliged to comply with the [Code of Practice for Statistics](#). Under this code, we have a duty to ensure that sector wide Graduate Outcomes data are equally available to all and not made available to some people before others. If widespread early sharing of data relating to individual providers were to occur, it would undermine our ability to comply with this duty and it would force us to review the schedule under which providers are given early access to data for their own graduates.

To keep up to date with our plans with regards the release date for the Graduate Outcomes statistical bulletin, please visit our [upcoming data releases](#) webpage. If you have any further questions regarding this embargo period, please do not hesitate to contact us.

In view of the above, providers are requested to put in place controls to ensure only internal use of the data. It is essential that the final delivery of the survey response data is not shared outside of the provider. Please see below for further information on issues to be taken into account in your processes.

[FOLLOWING EXPIRY OF THE EMBARGO, HOW CAN THE FINAL PROVIDER SURVEY RESULTS DATA BE USED?](#)

[All uses must be in accordance with the Graduate Outcomes Collection Notice and your agreement\(s\) with HESA](#)

The Graduate Outcomes Collection Notice outlines to graduates how the data should be used – see Purpose 1. It is essential that your organisation's use of this data is in compliance with the terms of the Graduate Outcomes Collection Notice.

Whilst HESA's Data Protection team is happy to respond to queries regarding proposed uses as stated above, your first port of call for data protection queries should be your own Data Protection Officer or, if you do not have one, take specialist advice.

As previously indicated, HESA is happy to receive suggestions from providers on how the collection notice terms can be improved. Please provide any suggestions to data.protection@hesa.ac.uk.

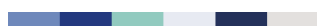
[No decisions should be made about the graduates surveyed](#)

Survey response data should not be used to make decisions about graduates who have responded to the survey. For example, graduates should not be profiled by your organisation using their survey responses to provide insight for fundraising activity.

[Do not contact graduates unless they have given explicit consent to be contacted in their survey responses](#)

Graduates should not be contacted about their survey responses unless they have given explicit permission for this (see HEPCON field). Where a graduate has agreed to be contacted further to the survey, it is a legal obligation for Controllers to provide privacy information to the graduate. This is to ensure the graduate understands how their information will be used by the Controller.

Providers must determine their own legal grounds for contacting such graduates. Whilst the HEPCON field indicates permission to be contacted, providers should note that such consent



was **only** for contact in relation to information provided in the survey answers and this consent should not be relied on for another purpose.

Where a data subject withdraws their consent to be contacted, we will notify the Graduate Outcomes Record Contact at your provider.

Free text boxes

Providers will recall that graduates have the opportunity to complete free text boxes in the survey. These free text boxes have not been reviewed or amended by HESA and will be delivered exactly as written by the graduate. We strongly recommend that this is taken into account in the processes established by the provider for using this data as the free text could contain sensitive information, opinions or references.

Use of statistical information in published materials to improve courses and services and to promote them to current and prospective students

When information derived from the survey response final data delivery is proposed to be used in a publication, the provider must ensure that it has taken all appropriate steps to anonymise the information.

HESA uses a rounding methodology for this purpose (which it keeps under regular review) to anonymise data. Details of the methodology HESA uses can be found on the [HESA website](#).

Data subjects' rights

Providers are reminded that, depending on the lawful basis on which they are processing the final delivery of survey response data, that data subjects' rights may apply.

Under Data Protection legislation, graduates have the right of access to their personal information. They also have: rights to rectify inaccurate information; restrict processing or object to processing; and the right to be forgotten (i.e. to seek erasure of their personal data). These rights are limited in certain circumstances by the GDPR and the Data Protection Act 2018 in circumstances where data is only processed for research or statistical purposes. As an independent Controller, it will be the provider's responsibility to determine if the limitations apply.

Intellectual property rights

Please ensure that whenever you use, reproduce or reference any survey response data you include an attribution and caveat on behalf of HESA in the form below:

Contains HESA Data: Copyright Higher Education Statistics Agency Limited 2020.

The Higher Education Statistics Agency Limited cannot accept responsibility for any inferences or conclusions derived by third parties from its data.

In order to improve the utility of the final survey response data, HESA has generated some derived fields using third party data. For example, HESA uses data from Royal Mail, Ordnance Survey, the Office for National Statistics and Land Property Services in Northern Ireland to generate location data from postcodes. Where third party data is used in derived fields, providers may be required to use appropriate attribution clauses if you choose to use, reproduce or reference the data. For example:

Contains Ordnance Survey data © Crown copyright and database right 2020

Contains Royal Mail data © Royal Mail copyright and database right 2020

Source: Office for National Statistics licensed under the Open Government Licence v.3.0

Geographical mappings for Northern Ireland are based upon Crown Copyright and are reproduced with the permission of Land & Property Services under delegated authority from the Keeper of Public Records, © Crown copyright and database right 2020. NIMA MOU577.4

Details of any third-party data included in the final delivery of survey response data, links to any applicable licence terms and their required attributions will be specified in the published coding manual and derived field specification available from <https://www.hesa.ac.uk/collection/c17072/index> and <https://www.hesa.ac.uk/collection/c17072/derived/contents>.

CONTACT DETAILS FOR HESA'S DATA PROTECTION OFFICER

Should you have any queries with regard to the use of this data, the contact details for HESA's Data Protection Officer are as follows: email: data.protection@hesa.ac.uk, tel: 01242 211135.

Please do let us know if you have any suggested improvements to the Graduate Outcomes Collection Notices – we always welcome feedback.