

## GRADUATE OUTCOMES DATA USAGE GUIDANCE NOTE

### INTRODUCTION

This operational guide provides information which outlines the uses of survey response data which is provided to the Graduate Outcomes Survey Results User within the provider portal.

### RAW FEED OF SURVEY RESPONSE DATA

Once we have given providers' access to their results data, it will be possible to download/view a raw feed for all open cohorts. The data being made available will be dynamic, updated in the provider portal on a regular basis and accessible to colleagues who hold the Survey Results User role. This section outlines some of the key things that providers need to be aware of before downloading/viewing the survey response data. This takes into account the purpose for which the data is being collected and that prior to the final delivery, the data in the provider portal is dynamic and raw. As such, there are some limitations to the way the data can be used by providers.

#### Frequency of download

The delivery mechanism allows survey response data to be downloaded prior to the end of a cohort. As a separate Controller, this means providers need to consider how often it is necessary to download/view that survey response data. Providers also need to take into account that survey response data available for download/review during the collection may change prior to the end of the Graduate Outcomes collection.

#### SIC / SOC data

We appreciate that there is an interest in the Standard Industrial Coding (SIC) and Standard Occupational Classification (SOC) and wanted to draw to providers' attention the fact that the feed of SIC and SOC coding is dynamic and that the coding can change for graduates throughout the applicable survey year. This is due to:

- the flexibility of the survey process to make it easy to use for graduates i.e. those who partially complete their survey online can re-enter the survey at any time during their contact period.
- graduates can request changes to their survey response data e.g. when a third party has responded on their behalf or when they wish to correct information, they have submitted themselves.
- our data classification supplier is running a constant quality assurance process.

Until the final delivery of survey data in Spring 2020, the SIC and SOC data may be subject to change. Please also be mindful that SIC and SOC coding can constitute Personal Data.

Providers cannot challenge individual codes, only where there appears to be systemic errors in the coding. Please contact the Liaison team by emailing [liaison@hesa.ac.uk](mailto:liaison@hesa.ac.uk) in these instances.

#### Free text boxes

As we have included the ability for providers to choose to download data on a regular basis, providers are reminded that the graduates' responses in the free text boxes have not been reviewed or amended and will be exactly what has been written by the graduate. We therefore recommend that providers take this into account in how they process downloaded survey response data.

## Access control to the Graduate Outcomes data

As the survey response data (including information derived from it) should not be made public prior to the publication of the relevant Official Statistics, providers are reminded that they should put in place restricted access control for their internal use of the data i.e. only to those staff who have an operational requirement to access the information.

## EXTERNAL PUBLICATION

It is essential that the survey response data viewed or downloaded from HESA is not shared outside of the provider. It is embargoed until HESA's first release of Graduate Outcomes data which is expected in Spring 2020 in the form of a Statistical Bulletin. For example, providers should not share SIC and SOC coding or any other type of survey response data via JISCMail or shared spreadsheets for comparison purposes.

## PURPOSE 1

The [Graduate Outcomes Collection Notice](#) (referred to as the privacy notice on the Graduate Outcomes website), outlines to graduates how the data should be used – see Purpose 1. It may be helpful to know that this is made available to graduates on the first screen of the online survey, in the email invitations and at the start of a telephone interview.

The final delivery of the Graduate Outcomes collection data is due in Spring 2020 and as stated above prior to this delivery, the survey response data and SIC and SOC coding is subject to change and additional restrictions on use. Further guidance will be issued in respect of how information from the final delivery should be processed within this purpose.

## MAKING DECISIONS ABOUT THE GRADUATE

Survey response data shouldn't be used to make decisions about graduates. For example, graduates should not be profiled using their survey responses to provide insight for fundraising activity.

## EXPLICIT CONSENT TO CONTACT

Graduates shouldn't be contacted about their survey responses unless they have given explicit permission for this (see HEPCON field). Where they have agreed to be contacted in relation to any of the information they have given in the survey, providers must provide a new privacy notice in compliance with Article 13 of the General Data Protection Regulation so the graduate understands how their information will be used. Providers must determine their own legal grounds for contacting such graduates.

## OPT OUTS AND COMMUNICATING WITH GRADUATES MID-COHORT

We have listened to the feedback from providers and one of the ways we are working to boost response rates is to encourage providers to make contact with graduates at specific points during the cohort. This was not planned for at the start of the survey. Providers will recall that as part of the consultation it was made clear to HESA that in order to encourage response rates it was important to the sector that the survey be co-branded and that the survey be presented as coming both from providers and HESA. HESA took specialist data protection advice to achieve this; particularly in respect of the Graduate Outcomes privacy notice and script.

We currently advise against providers contacting graduates regarding the Graduate Outcomes Survey themselves during a live cohort to avoid inadvertently breaching data protection law where a graduate has opted out of undertaking the survey. We plan to develop the functionality within the provider portal to show providers which graduates have opted out of being surveyed. These points have been issued in advance of the functionality being available. When the Graduate Outcomes communications policy is updated and providers are recommended to contact graduates, this will enable providers to ensure that graduates who have opted out are not targeted in these communications.

When this functionality becomes available, HESA will provide guidance on when and how these communications should be issued including some suggested wording for ease of use. These communications will only be recommended within very small windows in the engagement strategy to ensure they complement it, and do not overload the graduates.

Where HESA provides details of which students have opted out of Graduate Outcomes, this information can only be used by providers for operating their own suppression list i.e. a list that contains the contact details that your provider will wish to exclude from future contact about Graduate Outcomes.

## PERSONAL DATA

Upon receipt of survey response data, your organisation will become a Controller and must comply with all applicable data protection legislation. It also notes that processes need to be put in place before download to ensure that the survey response data is processed securely, in accordance with data protection law and with appropriate access control - see 'Access control to the Graduate Outcomes data' on page 1.

Given the restriction on how the data can be used, this process must ensure that any internal recipients understand the purposes for which they can process the data.

As an independent Controller, each provider 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.

## PERSONAL DATA BREACHES

The contact details for our Data Protection Officer should you need to notify HESA of a personal data breach are as follows: email: [data.protection@hesa.ac.uk](mailto:data.protection@hesa.ac.uk), tel: 01242 211135.