

## **UK GDPR: DATA PRIVACY NOTICE: Teaching Cultures Survey 2022**

### **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – You, or another natural person

Data protection legislation – Means the data protection legislation in force in the UK and includes the Data Protection 2018 (as amended) and the UK General Data Protection Regulation (UK GDPR).

### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The UK GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of UK GDPR). For example name, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The UK GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of UK GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **2. Who are we?**

R. H. Graham Consulting Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details can be found on <https://rhgraham.org>. For all data matters contact Ruth Graham.

### **3. The purpose(s) of processing your personal data**

We use your personal data for the following purposes:

The data captured are the responses to the Teaching Cultures Survey (TCS). The TCS is a global, cross-institutional survey. Survey respondents are university academic staff who hold a contract of employment with their university. The survey asks respondents to answer questions on their job role, discipline, gender and length of employment at their university. Other survey questions ask about attitudes, opinions and experiences of how teaching is supported and rewarded within their university's career structures. The survey does not ask for personal information (such as name or email addresses) neither does it capture the participant's IP address. However, the responses you include on the survey may be able to identify you when used in combination with other information. For example, if you disclose your gender + your length of employment + your academic department, there is a possibility that in some situations this combination of data may identify you. These data, however, are only available to the team processing the survey results; none of the individual responses are accessible by the participating universities.

#### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data: survey responses only. No names, email addresses, IP addresses or other personal information are needed or captured in order to complete the survey.

#### 5. What is our legal basis for processing your personal data?

##### a) Personal data (article 6 of UK GDPR)

##### Our lawful basis for processing your general personal data:

<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject.	The survey results are required to complete the reports delivered as part of the TCS. Participation in the survey is not compulsory. The survey results are combined into amalgamated data sets. An individual's responses cannot be identified from the output data sets.
--	--

##### b) Special categories of personal data (article 9 of UK GDPR)

No special categories of data are collected or processed.

More information on lawful processing can be found on the [ICO website](#).

#### 6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with contracted data analysts (data processors) during the process of completing the reports. The 'raw' survey data will not be shared with participating universities – only aggregated findings from it.

#### 7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary in order to complete the analysis of the data required to produce the reports of institutional survey findings. The unprocessed survey data will be deleted from the survey tool within six months of the completion of the survey. The survey data will be held in secure storage systems that meets the standards of ISO27001. The survey data will be retained until after the final iteration of the survey has been completed (anticipated to be held in 2024). This is to allow for comparison of the results across the three survey iterations in 2019, 2022 & 2024. The data will be kept for a further year to allow for any queries or audits that may be required. All survey data will be deleted following the completion of the overall project, which is anticipated to be 2025.

#### 8. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so will mean that your survey responses are not included in the reports.

## **9. Your rights and your personal data**

Unless subject to an exemption under the UK GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority)); direct marketing and processing for the purposes of scientific/historical research and statistics).

## **10. Transfer of Data Abroad**

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE UK.

## **11. Automated Decision Making**

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

## **12. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on the following webpage: [www.teachingcultures.com/resources/Privacy.pdf](http://www.teachingcultures.com/resources/Privacy.pdf). Please check back frequently to see any updates or changes to our privacy policy.

## **13. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact R H Graham Consulting Limited. Contact information can be found at [www.rhgraham.org](http://www.rhgraham.org).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](http://www.ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.