

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

Articles 13 and 14 of the General Data Protection Regulation requires information to be provided, or made readily available, to data subjects so that they are informed in a transparent manner 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.

The collection notice is published each year for students commencing and resuming their studies in that calendar year. The data collected pursuant to that notice will then be shared with the HEA with the following years returns. In accordance with the principle of fair obtaining, the HEI should at all times ensure the correct and current Data Collection Notice is published and for the avoidance of doubt the notice below is relevant for the 2022/2023 academic year.

HEA Student Data Collection Notice 2022

Who we are (data controllers)

The HEA has a statutory responsibility for the effective governance and regulation of the higher education system pursuant to the Higher Education Authority Act 1971 and subsequent amending legislation which has extended its remit to encompass Institutes of Technology and more recently Technological Universities. In order to discharge its functions effectively it must process certain categories of personal information. The relevant legislation in relation to the data processing that involves the work of the HEA are the following:

- The Higher Education Authority Act 1971
- Social Welfare Act 2005
- Social Welfare (Consolidated Claims, Payments and Control) Regulations 2007 (142/2007)
- Social Welfare (Consolidated Claims, Payments and Control) (Amendment) (No. 4) (Sharing of Information) Regulations 2015 (SI 317 of 2015)
- Universities Act 1997
- Institutes of Technology Act 2006
- Technological Universities Act 2018.

Forthcoming legislation to be enacted by government in 2022 which is relevant to data processing by the HEA:

Higher Education Authority Bill 2022

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.

The HEA Data Protection Officer (“DPO”) may be contacted at dataprotection@hea.ie

What personal information does the HEA collect from you or obtain from others?

The HEA does not, except in limited circumstances, collect data directly from individuals. It is collected by Higher Education Institutions (HEIs) and passed to the HEA so as that the HEA can process the data so as to perform its statutory functions under the 1971 Act. The HEA processes the following personal data:

The Student Records System (SRS)

At registration for the HEI you will be attending, you will give data to your Institution. That data forms the basis of the SRS dataset. The data collected for the SRS is set out in Schedule 1 of this notice.

Graduate Outcomes Survey (GOS)

In respect of this survey, you will be contacted approximately 9 months post-graduation by your Institution to fill out the survey. It is conducted on a voluntary basis, although not on the basis of consent; that is to say that while it is voluntary to partake in the Survey, the HEA does not rely upon Article 6(1)(a), but relies upon the fact the processing is necessary for the performance of a statutory function or Article 6(1)(e). The data collected are set out in Schedule 1 of this notice.

The Equal Access Survey (EAS)

The EAS is conducted by the individual HEI on a voluntary basis. The objective of the EAS is to ask higher education new entrants to answer a set of access related questions as part of the normal registration procedure. Registration in the main occurs in institutions between August and late October each new academic year. The questions relate to students facing social and/or financial barriers to higher education. Like the Graduate Outcomes Survey, the HEA does not rely upon consent as the basis for operating the survey, but upon the necessity to carry out the survey for the performance of its statutory functions and reasons of substantial public interest. The details collected are set out in Schedule 1 of this notice.

What other information does the HEA collect from you or obtain from others?

During your studies, you will be invited to participate in StudentSurvey.ie (Irish Survey of Student Engagement) or PGR StudentSurvey.ie (Irish Survey of Student Engagement for Postgraduate Research Students). Some of your information will be sent by your higher education institution directly to the survey company to ensure that the survey is offered only to relevant target groups. Your information will be used to collect your responses to the survey and make further anonymous analysis of results possible, for example, by gender or full-time/ part-time. This anonymised information will be shared with the HEA; 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 (and so the information is not 'personal data' for the purposes of the GDPR).

Why does the HEA collect this information?

To fulfil its legislative obligations the Higher Education Authority (HEA) requires an evidence base. This evidence base is provided by gathering individual student level data from the Higher Education Institutions. The primary database maintained in this respect is the Student Records System (SRS). Other datasets maintained by the HEA include the Equal Access Survey (EAS) and the Graduate Outcomes Survey.

Currently data is required for the following purposes:

- Trend analysis for annual publications on enrolments and graduates, by student and institute characteristics
- Annual progression analysis of new entrants, by student and institute characteristics
- Annual graduate outcomes analysis, by student and institute characteristics
- To inform funding allocation to HEA-funded higher education institutions
- Annual analysis of equity of access metrics of our Higher Education cohort
- Forecasting future enrolment and graduate numbers
- Reporting higher education data to international agencies such as the OECD, UNESCO and Eurostat
- Providing data to the Department of Education and DFHERIS to inform their decision-making processes and forecasting analysis
- Provide SUSI with data to inform grant application decisions
- To provide data to the CSO under the Statistics Act 1993
- To measure degree outcomes for students
- To track students for completion rate analysis

Who the HEA shares your data with:

The primary purpose the HEA has for collecting data is for statistical analysis in furtherance of its statutory obligations and to inform funding and other decisions made by the HEA. The HEA via its portal system shares personal data relevant to a HEI, with that HEI. The HEA also shares personal data with the following Government departments and public bodies. The HEA ensures that there are data sharing agreements in place with organisation with which data is shared. The table below provides more information regarding what is shared and the reasons for sharing.

<i>Third party name</i>	<i>Purposes for Sharing the data</i>	<i>Lawful Basis for Sharing</i>
The Department of Education The Department of Further and Higher Education, Research, Innovation and Science	The HEA shares identifiable microdata with the Department of Education to allow for transitions rate analysis from 2 nd level to 3 rd level and to produce 3 rd level demand projections. Data are also shared to allow for detailed geographic participation rate analysis and monitor access and outcomes for disadvantaged students. The HEA shares disaggregated course level data with DFHERIS to inform policy and allow analysis of the third level education sector.	Data is shared with other Government Departments and agencies to allow them to carry out their statutory functions. The sharing is allowed under Section 266 of the Social Welfare Consolidation Act 2005 as set out in the Social Welfare (Consolidated Claims, Payments and Control) Regulations 2007 and as amended by Social Welfare (Consolidated Claims, Payments and Control) (Amendment) (No. 4) (Sharing of Information) Regulations 2015.
The Central Statistics Office	The HEA shares identifiable microdata with the CSO to analyse graduate outcomes and to measure the effectiveness of the higher education	Statistics Act 1993 and a memorandum of understanding dated 4 th February 2015.

	system. HEA data is linked to other Government administrative datasets in the CSO.	
SUSI – part of the CDETB (City of Dublin Education and Training Board)	The HEA matches SUSI grant application data to HEA student record data using PPSN to verify previous attendance at HEA-funded institutions. SUSI data may be used in the HEA to allow for analysis of outcomes for disadvantaged students.	The SUSI data sharing agreement has its lawful basis under section 28 of the Student Support Act 2011.
The Department of Social Protection	The HEA shares PPSN, name, address and date of birth data to verify PPSN data with Client Identity Services.	In accordance with Government policy, the PPS number is used as the unique identifier on HEA databases. This allows for a continuity of statistical analysis and allows databases to be maintained accurately as well ensuring that there are no duplicate records in the system. The PPS number obtained may be validated using the Department of Employment Affairs and Social Protection PPSN client identity service.
SOLAS	The HEA shares identifiable microdata with SOLAS to allow for transitions rate analysis from further education to higher education and to track progress and outcomes for FE entrants into HE.	Data is shared with other Government Departments and agencies to allow them to carry out their statutory functions. The sharing is allowed under Section 266 of the Social Welfare Consolidation Act 2005 as set out in the Social Welfare (Consolidated Claims, Payments and Control) Regulations 2007 and as amended by Social Welfare (Consolidated Claims, Payments and Control) (Amendment) (No. 4) (Sharing of Information) Regulations 2015.
The Department of Public Expenditure and Reform	The HEA shares disaggregated course level data with DPER to allow for detailed labour market analysis.	Data is shared with other Government Departments and agencies to allow them to carry out their statutory functions. The sharing is allowed under Section 266 of the Social Welfare Consolidation Act 2005 as set out in the Social Welfare (Consolidated Claims, Payments and Control) Regulations 2007 and as amended by Social Welfare (Consolidated Claims, Payments and Control) (Amendment) (No. 4) (Sharing

		of Information) Regulations 2015.
External Contractors	The HEA, on occasion, contract external bodies to process microdata in order to fulfil statutory functions, e.g. geocoding of student address data.	Contracts are organised through the OGP and data processing agreements are in place where necessary.

Data processors

The HEA shares certain personal data with other organisations acting as processors, subject to appropriate data processing agreements and due diligence.

Anonymised sharing

The HEA also shares statistical data with other Government departments who may benefit from same. This data is not personal data within the definition of Regulation 2016/679. Such aggregated data is shared in a form where the data subject is not identifiable and is shared from the SRS, EAS and GO databases.

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.

Student level data collected in the Student Records System and via the Graduate Outcomes Survey and the Equal Access Survey are required to fulfil the statutory functions of the HEA. Student level data, including PPSN, is required to verify eligibility under the free fees scheme and for SUSI grant eligibility. PPSN is also required to link HEA data to other administrative Government datasets both within the HEA and in the CSO. Longitudinal analysis of these linked datasets allows the HEA and the Department of Education to formulate more effective education policy, measure the societal value and impact of the education system, measure outcomes – including for disadvantaged cohorts, and direct investment appropriately. For these purposes, student level data will be retained by the HEA from return year 2004 data currently in the system for a period of forty years – the majority of the active labour market years for students/graduates. Please note that student level data is stored securely in the HEA and is only shared with authorised bodies specified in legislation and/or the student data collection notice presented to students at registration. The identity of students is never disclosed to unauthorised third parties.

For further details on the applicable retention periods, please contact the HEA Data Protection Officer at dataprotection@hea.ie

Does the HEA transfer your information outside The European Union or European Economic Area?

Not at present. Any processing which may take place outside the EU or EEA will only be carried out with all necessary safeguards and in accordance with the GDPR.

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 object to processing in the context of Article 21 GDPR

You may exercise any of the above rights by contacting the HEA Data Protection Officer at dataprotection@hea.ie

You may lodge a complaint with the Office of the Data Protection Commission in respect to our processing of your personal data. The website is 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 2022/2023 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

By phone: 01 2317100

Address: 3 Shelbourne Buildings, Shelbourne Road, Ballsbridge, Dublin 4.

More detail on the HEA's data processing activities can be found via the Data Privacy Notice-
https://hea.ie/about-us/data_protection/

Data Collection Notice: Schedule 1

List of data items the HEA collect or obtain from higher education institutions, 2022/2023 Academic Year

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
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
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
Student Grant/DES Grant ¹

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. Data sent to the HEA as part of this process include:

Return year
Institution code
Academic year
Student ID
Course code
Blind or deaf indicator
Physical disability indicator
Learning disability indicator
Psychological, emotional, or mental health indicator
Other condition indicator
Support requirement
Parental status
One parent allowance status

¹ Note: this does not relate to SUSI grant data. The collection of data in the Student Grant/DES Grant field is pending and will commence when the forthcoming legislation, The Higher Education Authority Bill 2022, is enacted by government. This field should be included in the 2022/2023 SRS collection if the legislation is passed prior to this collection. Alternatively, it will be included in the 2023/2024 SRS collection.

Ethnic culture
Home or term accommodation
Commuting time

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 code
Course name
ISCED field of study information
NFQ Level
Programme type code
Year of graduation
Return year
Response – yes, no or continuing graduate
Principal economic status – main
Principal economic status – all
Job title
Occupation (broad)
Organisation
Employment (where)
Employment Ireland
Employment overseas
Sector (broad)
Employment type
Contract type
Salary
Placement/work experience/internship
Placement/work experience/internship (time)
Relevance of course
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/further study
Same course again indicator
Follow up willingness indicator

HEA SRS data, Equal Access Survey data and Graduate Outcomes Survey data are linked in the HEA for analysis purposes via Student ID and/or PPSN.

A Data Privacy Impact Assessment updated for May 2022 relating to the Student Record System, Equal Access Survey and Graduate Outcomes Survey has been circulated to Data Protection Officers in the higher education institutions.