

Privacy Notice for Staff regarding teaching surveys (TQARO)

London School of Economics & Political Science (“LSE”, “School”, “We”, “Our”, “Us”). LSE is one of the world’s leading social science universities. We are committed to a strategy that will build on our strengths, address challenges and maintain our worldwide reputation for excellence. LSE offers a range of different programmes, from undergraduate and graduate study, to executive education, distance learning, language study, summer school and study abroad options. Further information can be found in the [Study at LSE](http://www.lse.ac.uk/) section of our main website at <http://www.lse.ac.uk/>.

This Privacy Notice explain how LSE processes the personal data of our students and prospective students and your rights in relation to the personal data we hold. It sets out the obligations of LSE, a private company limited by guarantee, registered in England under company number 70527, whose registered office is at Houghton Street, London WC2A 2AE, UK.

For the purposes of any applicable data protection laws in England and Wales, including the General Data Protection Regulation 2016/679 (**GDPR**), the School is the data controller of your personal data. The School **Data Protection Officer is Rachael Maguire**, who can be contacted via email at glpd.info.rights@lse.ac.uk , via telephone on +44 20 7849 4622 and you can write to us at the above address.

What is personal data?

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

LSE data protection obligation

LSE will use the personal data you provide, as well as personal data for which you have given consent for us to receive (e.g. from UCAS or SLC data) to process your application and enrolment.

In accordance with the General Data Protection Regulation (GDPR), Data Protection Act 2018 (“DPA”) and any data protection legislation enacted in the UK, we are the data controller of your personal data and this means that we are legally responsible for the personal data we collect and hold about you. One of our responsibilities is to tell you about the different ways in which we use your personal data – what information we collect, our legal basis for doing so, why we collect it, where we collect it from and whether and with whom we will share it. We also need to tell you about your rights in relation to your personal data. In addition to the information in this statement, you may be given further information about the uses of your personal data when you sign up to use specific services and facilities we offer, and in certain situations, you may be asked whether you give your consent to us processing information about you.

We may collect information about you through the teaching surveys

The Course and programme surveys at LSE ask students about their experiences at LSE in relation to their course, programme or their specific teaching. In the process of filling in the surveys students may be asked to directly comment on their teachers (named section in the course survey) or they comment on teaching in the programme surveys indirectly.

The surveys are confidential, not anonymous, so the Teaching Quality Assurance and Review Office (TQARO) which administers the surveys, can identify respondents to surveys and their answers. We would only do so if there was a pressing need e.g. offering support to a student due to a safeguarding issue which was mentioned in the qualitative comments. The results are processed and sent to academic departments at LSE and these results are anonymous. Some divisions or departments use the results in conjunction with special characteristics data to enable analysis of results. TQARO will match the data with certain characteristics of the respondents, but the data is aggregated and no individual respondent is identified as part of this type of analysis. For example, the Eden Centre may want information on how satisfied students are with LSE's teaching broken down by gender.

The sort of data that we will collect about staff/students to facilitate the teaching surveys includes:

- Name of teacher for course surveys

Collected from students only

- Student names are not collected but can be inferred from student ID and email address used to send unique links to students to complete the survey. This information is accessed only by TQARO, Planning Division and Data and Technology Services for the purposes of results processing and safeguarding if needed.
- Email address
- Fee Status (e.g. home, or overseas) used in analysis of data
- Nationality / Place of Birth / Domicile used in analysis of data
- Qualification Information (provided by you and external bodies e.g. UCAS) used in analysis of data
- Marks / Awards / Course used in analysis of data
- Programme and Course
- Parental Higher Education used in analysis of data, e.g. socioeconomic background or proxies for this.
- Contextual offer data

Sensitive or special category data we may also process about students in relation to the results includes;

- Ethnicity used in analysis of data
- Geodemographic Information used in the analysis of data
- Disability directly re inclusion plans and used in the analysis of data
- Gender used in analysis of data

➤ **Information we receive from other sources**

We work closely with third parties including, for example, Office for Students (OfS) IPSOS (NSS data) and HESA for benchmarking purposes. For example, for the National Student Survey (NSS) we share student contact details and programme information on each eligible student so OfS and IPSOS can run the survey. Before the survey starts a communication will be sent to students notifying of them that

their contact details and programme data will be shared with IPSOS. Please see this page for further details on the NSS's [privacy policy](#).

Legal basis for processing personal information

Data Protection Laws require that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "legal basis" for the processing. We take our responsibilities under Data Protection Laws extremely seriously, including meeting these conditions. The legal bases on which your personal data are collected are explained below.

- **Performance of contract:** The processing of your personal data may be necessary in relation to the contract we have entered into with you to provide LSE's services to you or because you have asked for something to be done so you can enter into such contract.
- **Legal reasons:** We are required to process data relating to the National Student Survey due to the Office for Students regulatory requirements.
- **Public interest:** The processing of your personal data may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- **Social protection law:** We will process data relating to equity and diversity as required and in accordance with your fundamental rights as a data subject.

Purposes for which we process your personal data

We will process the survey results data for the following purposes:

- To conduct surveys on teaching quality and to feedback the results to departments.
- To improve teaching quality and student experience as part of LSE Strategy 2030 Priority 1: Educate for Impact. E.g. The library may want to review all programme survey qualitative comments about the library service.
- To inform decisions about faculty promotion and review.

➤ **Special category personal data**

We will use student special category personal data about students' physical, mental health or disability where they choose to provide these details to us **for the purpose of reviewing reasonable adjustments relating to a disability**.

Open text/qualitative comments relating to health, including mental health will be flagged to the Disability and Wellbeing Service if there is a serious cause for concern under our duty of care responsibilities.

Who will your personal data be shared with

Your personal data contained in the surveys is shared as is necessary, on a considered and confidential basis, with relevant staffs of LSE and external organisations e.g. with our Surveying platform EvaSys – names, email addresses. These organisations act on our behalf in accordance with our instructions and do not process your data for any purpose over and above what we have asked them to do.

Student survey response data will always be circulated anonymously when shared with departments and any surveys that have less than three respondents will not be reported/used to ensure confidentiality.

Course surveys data results

- Course survey teaching questions relate to named teachers and these results are disseminated as agreed by Academic board (details below).
- Course convenors will see all course/teacher scores and unredacted qualitative comments for the course they are convening.
- Individual teachers will see their teaching scores and unredacted qualitative comments related to their own teaching (the named teacher section questions on the survey) and the general course questions scores, plus unredacted comments from section 1 of the questionnaire (about the course) if the home department of the course has opted into this.
- Heads of Departments (HODs), Department Managers, Deputy Department Managers (with responsibility for education as denoted by the department) and Deputy Heads of Departments (Teaching) will have access to all the aggregated course survey scores (course and teacher questions) and unredacted qualitative comments for their department.
- Heads of Departments (HODs), Department Managers, Deputy Department Managers (with responsibility for education as denoted by the department), Deputy Heads of Departments (Teaching), and Programme directors will have access to all aggregated course survey scores for the Course question section only.
- Pro-Vice Chancellors for Education and Faculty Development will also have access to the scores.
- For Executive course surveys run by TQARO, additionally programme directors and programme managers will see all the aggregated course results (teacher and course questions).
- Survey data may be shared with HR who can request quantitative teaching results for promotion committees.
- Headline results at a School and department level for committees e.g. Student Experience Sub Committee
- Other requests on a case by case basis e.g. Eden centre may request aggregated by department scores for the question on Moodle to check satisfaction.

Programme surveys data results

- The programme surveys (UG/PGT) quantitative results are visualised in Tableau for all LSE staff to use, as they are not associated with specific teachers like the course survey, but by programme.
- The qualitative comments are redacted (identifying names or pronouns) inappropriate language removed before being disseminated to Departmental and Divisional leadership as a whole e.g. the head of the library service will look at the comments for any mentions of the library.
- The unredacted qualitative comments can be requested by the individual departments' leadership, e.g. Accounting would like to see all the accounting programme survey unredacted comments.
- Headline results at a School and department level for committees e.g. Student Experience Sub Committee.
- Other requests on a case by case basis e.g. a research project funded by EGI looking at themes in the UG/PGT/NSS redacted qualitative comments.

National Student Survey data results

- Once the internal results are published by OfS and IPSOS, the results are distributed to all staff, as unlike the course survey the questions are about the degree programmes.
- The NSS qualitative comments are redacted by OfS/IPSOS themselves and distributed.

We do our utmost to protect your privacy. Data Protection Legislation obliges us to follow security procedures regarding the storage and disclosure of personal information in order to avoid unauthorised loss or access. As such we have implemented standard security systems and procedures to protect information from unauthorised disclosure, misuse or destruction. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. If we need to transfer any information to a country not recognised as providing equivalent protection, we will use additional safeguards approved by UK or EU regulators. We do not allow our service providers to use your personal data for their own purposes – we only permit them to process your personal data for specified purposes and in accordance with our instructions.

Principle of processing your personal information

We will handle your personal data in accordance with the principles set out below.

<u>Principle</u>	<u>Personal Data shall be:</u>
Integrity and confidentiality	Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
Lawfulness, fairness and transparency	Be processed lawfully, fairly and in a transparent manner in relation to the data subject.
Purpose limitation	Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
Accuracy	Accurate and, where necessary, kept up to date.
Storage limitation	Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
Data minimisation	Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accountability

Be able to demonstrate compliance with the above principles

Your rights

Under certain circumstances, by law you have the right to which we will always work to uphold:

- **The right of access.** This enables you to request a copy of your data we hold about you and to check that we are lawfully processing it.
- **The right to rectification.** If any of your personal data held by us is inaccurate or incomplete, this enables you to ask us to make correction as deem fit.
- **The right to erasure.** This enables you to ask us to delete or remove your data where consent has been withdrawn and there are no other legal grounds for the processing.
- **The right to object.** You can object the processing of your data where we are relying on our compelling legitimate interests. You also have the right to object where we are processing your data for direct marketing purposes and profiling.
- **The right to restrict processing of your data.** This enables you to ask us to suspend the processing of your data or stopping further processing where there is no further legitimate ground to continue processing it.
- **The right to data portability.** This means that, if you have provided personal data to us directly and we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data in a machine-readable format to re-use with another service.
- **Rights in relation to automated decision making and profiling** – Rights not to be subjected to a decision based solely on automated processing and profiling.

Please keep in mind that there are exceptions to the rights above, there may be situations where we are unable to do so depending on the circumstances and the nature of your request. It may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data, it would not be possible to fulfil our legal obligations if we were to erase your data. However, where you have consented to the processing (for example, where you have asked us to contact you for marketing purposes), you can withdraw your consent at any time by completing our [Data Protection Form](#) and email it to us at glpd.info.rights@lse.ac.uk or by clicking the unsubscribe button on the marketing page. In this event, we will stop the processing as soon as we can. However, this will not affect the lawfulness of any processing carried out before your withdrawal of consent. The same form can be used to exercise any of the rights.

Offensive or inappropriate content on LSE websites

We may remove any content post or send which may reasonably be deemed to be offensive or inappropriate anywhere on or to LSE websites or social media channels, or otherwise engage in any disruptive behaviour on any LSE service, we may remove such content.

Where LSE reasonably believes that you are in breach of any applicable laws, we may disclose your personal information to relevant third parties, including law enforcement agencies or your internet provider. LSE would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, and in accordance with [LSE Retention Schedule](#) under our Information and Record Management page unless stated otherwise in a privacy notice.

Marketing

When you register an interest with the school or through one of our service providers, we may ask you to **Opt-In** to receive marketing services via your preferred communication channels. We will also make provision for a simple and clear way to unsubscribe at any time. We also send regular emails to let you know about our products and services and to inform you of the latest LSE research and insights. We may also invite you to take part in surveys about our products and services or matters concerning LSE.

Changes to Our privacy notice

We keep our Privacy Notice under regular review and may be updated from time to time. Any updates will appear on this webpage. This notice was last updated in August 2018.

How to contact us or make complaint to the regulator

If you want to exercise any of the rights described above or are unhappy with the way we have used your information, you should contact the School Data Protection Officer, **Rachael Maguire** at glpd.info.rights@lse.ac.uk. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR and related Data Protection Legislation. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you are dissatisfied with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office (ICO), which oversees data protection compliance in the UK. Details of how to do this can be found <https://ico.org.uk/make-a-complaint/>.