

Privacy Notice for Students and 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 sort of data that we will collect about you regarding the teaching surveys is:

- Name of teacher – 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
- Email address
- Fee Status (e.g. home, EU 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.

Sensitive or special category data we may also process 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, Ipsos MORI (NSS data) and HESA for benchmarking purposes and may receive information about you from them if you have provided specific consent to this sharing of your personal data in your agreements with those third parties.

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 combine the information we received from other sources with information you give to us in your application and process 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.
- To inform decisions about faculty promotion and review.

➤ **Special category personal data**

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

Open text 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 is shared as is necessary, on a considered and confidential basis, with relevant staffs of LSE and several external organisations which assist the School with handling enquiries and student applications and with sending you information about studying here. 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.

Teacher data will only be shared based on the following:

- The teacher level course scores from the surveys will be shared with Heads of Department and individual teachers
- The course level comments from students will be shared with the teacher of that course anonymously
- Named individuals within departments that have specific responsibilities regarding teaching quality
- Promotions committee members
- Pro-Directors for Education and Faculty Development
- Director of LSE EDEN Centre
- Programme level scores and comments will be shared with all departments

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/>.