



# Privacy notice: GRADE (GRading and Admissions Data for England)

The GRADE (GRading and Admissions Data for England) data sharing project is a joint initiative by the Office of Qualifications and Examinations Regulation (Ofqual), the Department for Education (DfE) and the Universities and Colleges Admissions Service (UCAS).

Our main objective is to provide accredited external researchers, and analysts within our Organisations (Ofqual, DfE, UCAS), with access to data concerning examinations and admissions to conduct research on educational and assessment systems in England and learn lessons from 2020 summer awarding arrangements. Analysis of this dataset has also the potential to provide valuable insight into the assessment of regulated qualifications and to be used as evidence to guide arrangements for awarding qualifications and university admissions policy and practice in England.

The data will be shared with accredited researchers through the Office of National Statistics Secure Research Service and controls have been put in place to protect the confidentiality and security of your data.

## Aims of the project

In summer 2020, with the closure of schools and cancellation of exams due to the coronavirus (COVID-19) pandemic, alternative awarding arrangements were put in place, with students receiving either the higher of a standardised grade or their centre assessment grade.

The aims of the project are to:

- allow us to learn lessons from the awarding of grades for GCSEs and A levels in summer 2020
- use data from the awarding of GCSEs and A levels in the period 2017 to 2020 to inform future education policy – particularly around the fairness of methods for measuring students' attainment, and implications for schools' and colleges' admissions processes
- provide accredited researchers with access to data through the Office of National Statistics Secure Research Service to allow them to perform insightful, evaluative independent research

The data will also be available to Ofqual, DfE and UCAS to undertake research which could inform decisions about future arrangements for awarding qualifications.

## Safeguarding your data

Each of the Organisations has different sets of data relating to assessment, attainment and admissions for students in England. This project will link these separate datasets together in order to make the data more useful for research.

We understand the need for there to be safeguards to protect the personal information of students, so we will seek to de-identify your information by removing data such as names, addresses and dates of birth from the linked data and pseudonymising data<sup>1</sup> before making it available to accredited researchers. The data will be securely shared using the Office of National Statistics Secure Research Service which will apply further safeguards before information is shared with accredited researchers.

## Your information and privacy

We want you to know how we (Ofqual, the Department for Education and UCAS) use your personal data as part of this project, why we need it, and what your rights are.

If you need extra help, would like this notice in an alternative, accessible format, or if you have any questions about this privacy notice or the information we hold about you, please contact one of the Data Protection Officers within any of our Organisations using the contact details below:

### Data protection office, Ofqual

Data protection, Ofqual, Earlsdon Park, 53-55 Butts Road, Coventry, CV1 3BH

Telephone: 0300 303 3344

Email: [dp.requests@ofqual.gov.uk](mailto:dp.requests@ofqual.gov.uk)

### Data protection office, Department for Education

Data protection, Department for Education, 2 Rivergate, Bristol, BS1 6EW

Telephone: 0370 000 2288

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<sup>1</sup> With pseudonymised data we mean personal data which has been processed in such a manner that the personal data can no longer be attributed to you without the use of additional information (a 'key').

Email: [dataprotection.office@education.gov.uk](mailto:dataprotection.office@education.gov.uk)

## Data protection office, UCAS

Data Protection Officer, UCAS, Rosehill, Cheltenham, Gloucestershire, GL52 3LZ

Telephone: 0371 468 0 468

Email: [datagovernance@ucas.ac.uk](mailto:datagovernance@ucas.ac.uk)

# Who is responsible for looking after your information

Each of the 3 Organisations (Ofqual, UCAS and the Department for Education) are either joint or independent data controllers of the personal data being processed as part of this project.

We are joint controllers when we:

- share the data each of us has that is relevant to this project
- decide how the Office for National Statistics will look after and process your data on our behalf
- grant access to data to accredited researchers to enable them to conduct independent research

We will be independent controllers if one of our Organisations uses the data we have shared between us in this project, for:

- purposes related to this project
- compatible purposes that help us perform and improve our functions, if that is in the public interest

Each organisation has its own privacy notice explaining how it uses personal data. Below you will find links which provide further information on this.

In any case, we are responsible for what we do with your personal data. Before we share any of your information with others, we ensure that they will treat your data according to the law and only on a need-to-know basis for the aims of this project.

# Information being shared

It's our job to tell you how we will collect and use your information as part of this project. If you fall into one of the 3 categories below, it is likely that we will be sharing some of your information as part of this project.

## Ofqual data being shared

Students who completed at least one GCSE or A level course in England in the summer sessions for 2017, 2018, 2019 or 2020.

## Department for Education data being shared

Students who were in Key Stage 4 or Key Stage 5 of education for all state schools, non-maintained special schools, sixth form colleges, further education colleges and independent schools in England in the academic years 2016 to 2017, 2017 to 2018, 2018 to 2019 and 2019 to 2020.

## UCAS data being shared

Students from England who applied to university through the UCAS main scheme at the age of 18 for the 2017, 2018, 2019 and 2020 application cycles.

## Personal data being shared

This is the list of personal data we will share. It includes characteristics as collected from the school census as well as information processed for awarding and for admissions processes:

- unique candidate identifier [linking only – not shared]
- first name, middle name and surname [linking only – not shared]
- date of birth [linking only – not shared]
- gender
- data concerning your health, specifically whether you have a special educational needs status
- racial or ethnic origin
- free school meal eligibility and other socio-economic indicators
- your age on 31 August at the end of the academic year relating to the exam

- whether you were a private candidate
- number of GCSEs taken
- grade awarded
- centre assessment grade (CAG) and the rank with your exam centre and subject group (for 2020 only)
- grade awarded after the outcome of any type of grading appeal
- marks for any exams you sat (excluding for 2020)

Data marked with [linking only – not shared] is used to link together the data from Ofqual, DfE and UCAS so that we can create the dataset that can be used for research. The information marked with [linking only – not shared] will not, however, be accessible to accredited researchers. Find out more information about how each organisation processes your data outside of this project in the section ‘privacy and data protection notices’.

## Special category personal data

The categories of information that we will process include personal data revealing your racial or ethnic origin and data concerning your health, specifically whether you have a special educational needs status (a form of ‘health data’). We collect this information for the purposes of monitoring equality considerations, for example, in ensuring that reasonable adjustments are being provided to students. This data is included within the data we are sharing for research purposes to allow, for example, further equalities analysis and research connected with 2020 awarding.

## Why your data is being shared

We will only share your information in order to achieve the aims of this project and carry out research into relevant areas, including:

- scrutiny of the standardisation model used in summer 2020
- the impact of exam awarding approaches on students like you
- the impact of exam awarding approaches on schools and colleges

We believe that research based on your data has the potential to improve fairness to students like you and to promote confidence in our education system.

## People who will be allowed to access your personal data

We will share your personal data between us (Ofqual, DfE and UCAS) and with the ONS, who will be processing your data on our behalf and under our instructions.

Your data will not be shared with just anyone who asks for access. Accredited researchers will need to go through an approval process and their research project will need to be approved by us before we grant access to your data.

Accredited researchers will need to access the research data from an ONS 'safe room' or from their workplace if it has been granted '[assured organisation connectivity](#)'. The accredited researchers will also be responsible for complying with data protection law when they access your data.

## Are we allowed to use your information?

We are legally allowed to use your information for the purposes explained above because the processing of your personal data, including special category personal data, is necessary for the performance of our public function and for research purposes which are in the public interest.<sup>2</sup>

The processing of your personal data is not likely to cause you substantial damage or distress and it is not carried out to take any measures or make any decisions about you. Your data is being processed in order to understand more about the education and qualification system and to promote equality of opportunity and treatment of students.

We have carried out data protection impact assessments for this project. We have considered and applied appropriate safeguards for your rights and freedoms, including with regards to the data minimisation principle making sure we are only making relevant information available. This is the reason why we will, among other safeguards, pseudonymise and de-identify your data to the fullest extent possible.

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<sup>2</sup> There are a number of legal provisions relevant to this work, but in terms of data protection law, the relevant provisions are: Article 6(1)(e) of the UK GDPR which allows us to process personal data for our public task; Article 9(2)(j) UK GDPR which allows us to process special category data where it is necessary for the purposes of research (such processing to be proportionate to the aims pursued and subject to safeguards); and schedule 1, paragraph 4 of the Data Protection Act 2018.

## How your information is kept safe

We have put measures in place so that people can only see the information that they really need, and they will not use the information to find out who you are. We have also taken steps to keep your information secure so it is protected from breaches and attacks from hackers, and other incidents.

We are taking measures to ensure your personal data is protected to the maximum extent, and have instructed ONS to do the same. Each organisation's data will be linked together and then pseudonymised by removing identifiable information before being converted to the data available to accredited researchers. Accredited researchers are trained and trusted to use data appropriately to carry out valuable, ethical research with a public benefit. Data will be accessed only using secure technology systems. Further security controls are also applied by ONS before the research output is disclosed to make sure that the identity of individuals is kept secure. [More details on these controls, also known as the Five Safes, are available on the ONS website.](#)

## How long your data is kept

Data will be kept for a minimum of 18 months. Accredited researchers that start a project within the 18 months will be allowed to complete their research even after this time. We will carry out periodic reviews to ensure the data is retained for no longer than is necessary for the research purposes for which the data was originally processed. Once we have concluded this project we will retain the data for a period of up to 5 years.

## Your rights

You have the right to:

- tell us you don't want us to use your information
- ask to see the information we hold about you
- ask us to change information you think is wrong
- ask us to remove information when it's not needed anymore
- be told how we use your information

Please note that some of these rights are qualified and may not apply. Ofqual, DfE and UCAS are not carrying out any automated decision making as part of this project. If you have questions about your rights, you can contact any of us using the details above. We will be able to help you and answer any questions that you have.

If you want to speak to, or make a complaint to, the authority who looks after information rights, you should contact:

[Information Commissioner's Office](#)

Telephone: 0303 123 1113

## Privacy and data protection notices

Each organisation publishes a policy on how it processes and protects personal information:

- [Ofqual's personal data protection policy](#)
- [Department for Education's model privacy notice](#)
- [Department for Education's personal information charter](#)
- [UCAS privacy notice](#)