

Learner Privacy Notice

Aimhigher West Midlands

1. Who are we?

Aimhigher West Midlands Partnership (the “**Partnership**”) is a partnership of universities and colleges, working to support learners who face a number of challenges to broaden their horizons and make informed decisions about their future educational and career choices. We do this by delivering a range of outreach activities such as Campus Visits, Summer Schools, Masterclasses and study support. The Partnership consists of The University of Birmingham (the “**University**”), Aston University, Birmingham City University, Newman University, University College Birmingham and the University of Worcester. The University is the lead partner.

In relation to Aimhigher programmes, the University, as the lead partner, is the data controller, but the other members of the Partnership also act as data controllers. When they do, they will explain to you how they use data they collect and process. Sometimes another organisation will also be a ‘data controller’ of your personal data (e.g. if you are applying or taking part in an outreach activity/programme delivered in collaboration with another organisation). That organisation should also explain this to you as well as how it uses your data.

This privacy notice provides information about how the University on its own behalf and on behalf of the Partnership uses the personal data we collect and process about you. It supplements the page on the University’s website: <https://www.birmingham.ac.uk/privacy>.

2. What personal data will be processed?

Applications and eligibility for outreach activities:

We will process the personal data you or your school provides to us in anticipation of your participation within an outreach activity or programme. This data will form the basis of your *outreach engagement record* and depending on the nature of the activity/programme this data will include some or all of the following:

- your name and postcode;
- your date of birth and year group;
- your gender and sex;
- your learner ID number (UPN/ULN)
- the name of your school/college and in some cases, your previous school/college (e.g. if you took your GCSEs there),
- your qualifications/grades;
- whether you are entitled to free school meals;
- whether you are eligible for pupil premium;
- whether you are in care or are a care leaver;
- whether you are a young carer;
- whether you are a refugee; come from a military family background or are estranged from family;
- information about your parents / carers (e.g. whether they have been to university/household income). We will assume that you have obtained consent from those individuals before you supply their contact details to us.

If your school or college provides this information to us, we will assume that they have your consent to do so or that they are relying on another lawful basis for processing your data.

In addition to this, we may need to process some data about you that is classed as 'special category' or sensitive personal data. This includes data about your ethnicity and health/disability status. We collect this for two reasons.

- Ethnicity data is important, as it enables us to analyse and carry out public interest research or statistical analysis into the diversity of the learners engaged with our programmes, which enables us to carry out our statutory obligations/conditions of funding and ensures our outreach activities are targeted at learners who are under-represented in higher education.
- Health and disability data will be used to provide support or reasonable adjustments at events. We will ask you for your explicit consent for this.
- Disability status is also collected for monitoring widening participation purposes. This data is used for evaluation purposes to help us and partnerships across the UK to tailor our activities and make them more accessible for all disabilities. No personal data on disabilities will be shared with other organisations, however aggregated, anonymised and evaluation data on disabilities (such as findings on how learners with varying disabilities respond to certain activities or which activities are the most effective) may be shared with other Uni Connect partnerships to help improve best practice and access to activities for disabilities, to make widening participation more effective and inclusive.

Engagement data and tracking outcomes:

If you are accepted on to an Aimhigher activity, we will monitor your engagement within outreach activities and evaluate the impact these activities have had in terms of your attainment, aspirations and your post 16 progression (i.e. where you go after school/college).

- We will collect the outreach engagement data using registers within events.
- From time-to-time you may be asked to complete evaluation forms, so that you can provide feedback on outreach activities.

Obtaining information about you from third parties:

At key points in your educational career, we may ask your school/college to provide us with information about you (as outlined above) and we may also ask for college/further education data from the Individual Learner Record (ILR). We may also ask third parties that hold national learner data sets to provide us with information about you; these will include the Higher Education Statistics Agency (previously HESA, now JISC), University Central Admissions Service (UCAS), the Student Loans Company (SLC), the National Pupil Database (NPD).

When requesting these national learner data sets, we will ask for information such as:

- your attainment at school/college;
- if you have/are receiving free school meals;
- if you have a disability;
- your ethnic group;
- the type/level of course you are studying; and
- whether you went to university
- your progression once at university.

Additionally, we may ask these third parties and/or your school/college to provide data on your background characteristics (e.g. from the school census), attainment and post 16 progression data (e.g. did you stay on in 6th form/go to college/go to university).

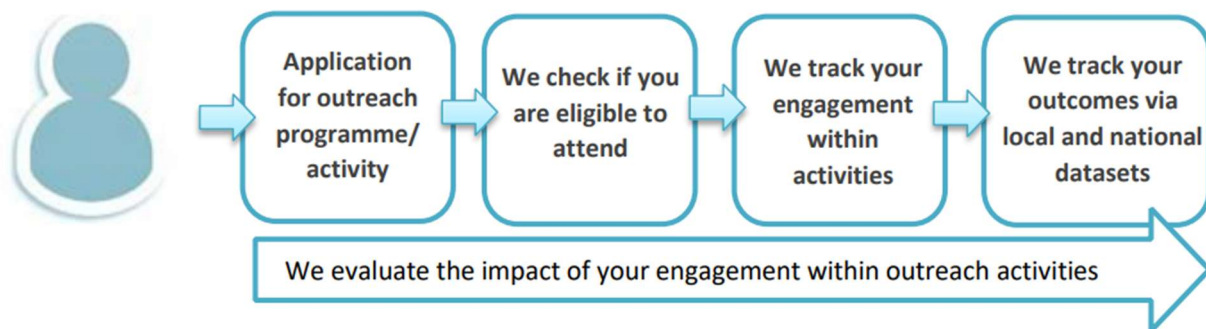
Your data will be stored in the Higher Education Access Tracker ("HEAT") database – information about the HEAT database is detailed below in Section 5. HEAT will match your data with the data requested from HESA. This is used solely to track progression into HE and that data will be matched in the year

that you would have started University if you progressed to it.

Even if you have not engaged in outreach activities we may monitor and track your outcomes from these data sets. This will allow us to compare your outcomes against outcomes of learners that have engaged to support planning and provide a robust evidence base in terms of which outreach activities are most effective.

Sometimes a third party may ask us to obtain your consent to track your outcomes (as referred to above) using their data, and if this is necessary, we will make sure we do so.

Diagram 1. How Data is Processed within Your Outreach Engagement Record



3. What is the purpose of the processing?

We will process your personal data in order to deliver the Aimhigher activities and agenda which includes:

- To consider the suitability of your application for the outreach event/programme to which you or your school/college has applied;
- To enable you to take part in outreach events, including putting in place any support which is appropriate;
- To monitor your subsequent engagement;
- To communicate effectively with you or your school/college by post, email, phone or other electronic media, including the communication of our decision on application to take part in an outreach activity / programme;
- To access national data sets, track your outcomes and identify if you progressed to higher education;
- To respond to any queries you or third parties may have about your participation within outreach activities;
- To fulfil our analysis and reporting obligations under the Aimhigher programme (e.g. monitoring your engagement in outreach activities to see if they have made a positive difference to your attainment and post 16 progression);
- To enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us).
- To enable us to make any necessary reasonable adjustments at outreach events you are attending.
- to enable us to carry out future statistical analysis in relation to the impact of outreach activities / programmes on learners from different socio-economic backgrounds or for historical or research purposes or to meet such reporting obligations as may be imposed on the University or Aimhigher by relevant authorities, for example the Office for Students

HEAT will also use the data stored within the HEAT database and the data that has been obtained about you from third parties to create aggregated and **anonymised** reports and evaluations that will be used to improve the quality and effectiveness of widening participation programmes across the country.

4. What is the legal basis of the processing?

Processing of your personal data is carried out because it is necessary:

- to perform our outreach activities and programmes and maintain records relating to such outreach activities which are tasks we carry out in the public interest;
- To monitor and track the impact of engagement in outreach activities and programmes, which are tasks we carry out in the public interest;
- to deliver the outreach programme you have applied for in accordance with our contractual obligations;
- to comply with a legal obligation (e.g. equal opportunities monitoring) or regulatory obligation (e.g. reporting to Government or governmental bodies).

We will only process special category data with your explicit consent or if it is necessary:

- For archiving, research and statistical purposes in the public interest;
- To perform our outreach activities in the substantial public interest for the purposes of keeping under review the existence or absence of equality of opportunity or treatment between groups of people, with a view to enabling such equality to be promoted or maintained.
- Very occasionally, when it is needed to protect your vital interests and you are not capable of giving their consent (for example, in an emergency);
- For the establishment, exercise or defence of any legal claims.

If your consent (or that of your parent/carer) is required for any specific use of your personal data which is not specified in this privacy notice, either we will collect your consent at the appropriate time, explaining why we are collecting the data and how we will use it, and outlining how you can withdraw at any time. Sometimes your school/college will collect this before forwarding information about you to us.

5. Who will my personal data be shared with?

Within the University, your data is shared with only those University staff who need access for the purpose of our programmes and activities.

The Higher Education Access Tracker (HEAT)

Your collected data will be input into the Higher Education Access Tracker (HEAT). HEAT is an online secure system supplied, hosted and operated by the London and South East University Group. HEAT is a collaborative platform used by Higher Education institutions and third sector organisations to assist with efficient delivery of engagement and to evaluate the effectiveness of their outreach and widening participation activities.

As well as acting as a data repository, HEAT links the data that we input with 'outcome' data from government agencies such as the Office for Students (OfS), the Department for Education (DfE), the Higher Education Statistics Agency (HESA), The Education and Skills Funding Agency (ESFA), the Joint Information Systems Committee (JISC) and the Universities and Colleges Admissions Service (UCAS) to establish which learners engaging with the partner universities have progressed into Higher Education. When we have collected data about you from third parties (as explained above in paragraph 1), that data will be matched by HEAT with data the University/Partnership have collected about you, to enable us to carry out analyse the impact of outreach activities / programmes on learners from different socio-economic backgrounds or for historical or research purposes or to meet such reporting obligations as may be imposed on the

University or Aimhigher by relevant authorities, for example the Office for Students. This data is not used to make decisions about you.

HEAT also enables its members to match a list of names, dates of birth and postcodes to find out if a student pre-exists on the online database and if HEAT another member has worked with that student.

Once your data is input into HEAT, they will be a controller of your data too, and HEAT and HESA may process your data as outlined in their privacy notices and data protection policy, which is accessible via the links here:

HEAT Privacy Notice: <https://heat.ac.uk/privacy-notice/>

HEAT Data Protection Policy: <https://heat.ac.uk/legal/>

HESA Privacy Notice: <https://www.hesa.ac.uk/about/regulation/data-protection/notices#linkg>

In the event that our agreement with HEAT is terminated, your personal data may be retained by, or transferred, to another permitted recipient or any organisation taking over the HEAT tracker.

External organisations

Your personal data is also shared with a range of external organisations as is necessary for the purposes set out above and as permitted or required by law, including the following:

- The Aimhigher Partnership - This helps with thorough evaluation between AHWMM partnership members and assessment of activity. Sharing between the Partnership also enables us to plan activity and to accommodate special requirements.
- your school/college – this enables your school or college to monitor the delivery and programme impact, and also this enables us to plan activity and to accommodate special requirements allows for comfortable activity arrangements and special requirements to be easily met
- The HE Statistics Agency (HESA/JISC), University Central Admissions Service (UCAS), The Student Loans Company (SLC), National Pupil Database (NPD) and Individual Learner Record (ILR) as explained above (see ‘Obtaining information about you from third parties’). This will include sharing special category data you provided as part of your application and during any subsequent engagement within outreach activities (e.g. your ethnicity and any details of your disability). Your data with these Organisations will likely be shared via the HEAT platform, but we may on occasion share this directly - this is so that we can track progression of learners into HE, which means we can effectively evaluate our activity offer.
- Partner Organisations participating in HEAT Services. HEAT members will be able to see if individuals whom they have collected data about have participated in an outreach activity at any other HEAT member institution. Whilst other HEAT members may be able to see you have attended an event with AHWMM, any personal details recorded by AHWMM will remain restricted to AHWMM – this is to help aid evaluation and keep a correct total of the number of outreach activities a learner has attended and to understand if they have been involved with multiple partnerships.
- Relevant Higher Education statutory regulatory bodies (e.g. the Office for Students in relation to Uni Connect Programme (previously the National Collaborative Outreach Programme) - AHWMM has a responsibility to provide this information to Higher Education statutory regulatory bodies for the improvement of widening participation activity across other Uni Connect partnerships.
- Third parties commissioned to deliver outreach activities or conduct evaluation or research on behalf of the Government, Government or non-governmental agencies in the public interest - AHWMM has a responsibility to provide this information, as long as the public interest basis is fulfilled, to help improve widening participation activity across the country.

- Occasionally and when necessary internal and external auditors or regulators – this serves to prove that AHWM is a capable and successful Uni Connect partnership and that AHWM stores its data correctly and accurately.
- Individuals, companies or organisations commissioned by the Office for Students to provide or evaluate outreach activities / programmes - AHWM has a responsibility to provide this information to help improve widening participation activity across the county.

Your personal data is also shared as is necessary, on a considered and confidential basis, with several external organisations which assist us with delivering our programmes and activities or who are commissioned to deliver outreach activities or conduct evaluation or research on our behalf. 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. We make sure we have appropriate contracts in place with them. Sometimes your personal data is processed by these organisations outside the European Economic Area (for example, because they use a cloud-based system with servers based outside the EEA), and if so, we make sure that appropriate safeguards are in place to ensure the confidentiality and security of your personal data. We will not normally publish or disclose any personal data about you to other external enquirers or organisations unless you have asked us to do so or have consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

6. How long is my data kept for?

We will retain the personal data collected from you and your school/college during the application process, your subsequent engagement within outreach activities and data we collect to evaluate the impact of our outreach programmes for:

- 7 years, if your data is not being tracked; or
- Where we are tracking your data, 15 years from the year you entered (or would be ready to enter) Higher Education or when you last engaged with a HEAT member organisation, whichever comes later.

After this period, your data will be anonymised or destroyed.

7. Do I have rights in relation to my personal data?

Details about your rights are set out on the University's website: <https://www.birmingham.ac.uk/privacy>, in the section "Your rights as a Data Subject". This also explains how to ask any questions you may have about how your personal data is used, exercise any of your rights or complain about the way your data is being handled.

8. Are changes made to this webpage?

This Privacy Notice is effective from September 2026. It is reviewed when necessary and at least annually. Any changes will be published here and if possible, you will be notified as appropriate. The Privacy Notice can be found on the AimHigher website at the following web address: [Privacy Notice 2026 - Aimhigher West Midlands](#)