

Privacy Statement for the NStEP Student Training Programme and NStEP Student Engagement Recognition Awards

Last Updated: March 2021

1. Purpose of this Privacy Statement

This privacy statement sets out what data we will collect from students, how we use it, and how we will protect that data in relation to the following NStEP activities:

- The **NStEP Student Training Programme**, including our introductory class representative training, online training options, and other events.
- The NStEP Student Engagement Recognition Awards, including milestone awards, submitting reflective reports to claim our Academic Representation award, and receiving digital badges.
- The **NStEP Academic Representation Project** and the use of data gathered on class representative experiences of carrying out their roles.

2. Background

The National Student Engagement Programme (NStEP) was launched in April 2016 by the Higher Education Authority (HEA), Quality and Qualifications Ireland (QQI) and the Union of Students in Ireland (USI). NStEP aims to strengthen student engagement in decision-making across Irish higher education. The Programme seeks to champion a strong culture of partnership between students and staff through practice-based projects, training, and capacity building, as well as informing policy developments.

Since 2016, NStEP has been providing training to students (primarily class representatives) through on-campus training sessions. In the academic year 2020/2021, these training sessions were delivered online, while a new online class rep resources hub (Student Portal) and national Student Engagement Recognition Awards scheme have been introduced. These opportunities require students to provide some personal details to sign up for training and resources, while the awards scheme will require students to submit evidence in order to be eligible for relevant awards. This means that NStEP will need to gather more data from the students who take part in our student training programme.

NStEP values your privacy and recognises the need to process your personal data in a fair and lawful manner in accordance with the legal rules laid out in the General Data Protection Regulation (GDPR) and the Irish Data Protection Act 2018. This privacy statement will provide you with information about the personal data we collect and how that personal data is processed as part of the student training programme and the awards scheme.

It is important to state clearly that we will never publish the name or any identifying details of participants in our student training programme.

NStEP is the Data Controller for user-submitted data collected as part of the student training programme. Where data is processed by a third party (such as Eventbrite) we have indicated it in this privacy statement.

3. Participating in the Student Training Programme

In order to attend training and to access recognition awards, your institution must have signed up to participate in NStEP. A list of participating institutions can be accessed here: https://studentengagement.ie/about/hei-participants/

A representative of your institution and/or your students' union will book training sessions with NStEP and then circulate an Eventbrite link that you can use to register. Sessions last for 90 minutes and are delivered online. You only need to attend one session. Afterwards you will be contacted via the email address you provided to inform you of further training and development opportunities, as well as to issue a digital badge ('milestone award') for attending the training session.

4. Attending Student Training Sessions and Events

a. What personal data do we collect from you when you sign-up for a training session?

When you sign up for training via Eventbrite you will be asked to provide your name and email address.

For any information in relation to the data that Eventbrite collects please refer to their Privacy Policy. Available at:

https://www.eventbrite.ie/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_IE

b. When you sign-up for a student training session or event, what will we do with your data?

Eventbrite will automatically send you confirmation and reminder emails relating to the training you have signed up to attend. Some of these emails will include the link you will need to attend. This will usually happen a few hours before the session is due to start.

NStEP will occasionally use your email address to contact you about further training opportunities during the academic year.

NStEP will also use your email address to issue any 'digital badges' you have earned by attending and completing training sessions or events. These 'digital badges' are online verified and portable **Student Engagement Recognition Awards** that allow you to demonstrate the training, skills, and experiences you have gained as part of our programme. For more information the NStEP awards and digital badges, visit: https://studentengagement.ie/student-engagement-recognition-awards/

These awards are issued via Open Badge Factory, which is a platform NStEP uses to create our badges.

For any information in relation to the data that Open Badge Factory collects please refer to their Data Processing Agreement. https://openbadgefactory.com/en/data-processing-agreement-2/

5. Achieving NStEP Student Engagement Recognition Awards

a. What data will we collect for you to achieve an award?

To gain a Student Engagement Recognition Award you will have to complete 3 steps. The first step is attending the introductory training for class reps (which we have covered above).

The second step involves a series of training, events and online modules that you can choose from. For all of these opportunities we will collect your name and email address. We may also request additional data such as the higher education institution you attend.

The third step involves the submission of a reflective report on your experiences as a student representative. This means that you will have to submit additional personal data in order to ensure you are eligible for an award. The questions that we will ask you to complete are contained in Appendix A at the end of this privacy statement.

b. Signing up for online modules on our website

As part of step two, NStEP offers students the opportunity to complete selfstudy online modules. These modules take around 30 minutes to complete.

In order to do this, you will need to create an account on our website. This will require you to confirm your email address and provide your name in your 'learner profile'. You don't need to complete a module in one sitting as your progress will be saved. You will be able to log back into your learner profile to resume a module at a later time. When you complete a module on our

website, you will be automatically issued with a certificate of completion, which can be downloaded from your learner profile on our website.

You can delete your account at any time. NStEP will also automatically delete accounts on our website after a period of inactivity of 2 years.

c. Use of your reflective report data

When you submit your reflective report as part of step three, NStEP will then verify that you have completed each section fully, including the submission of digital badges and certificates from steps one and two. This means that we can be certain that you are eligible for the Student Engagement Recognition Award.

If you have not fully completed the report, we will contact you to let you know how you can submit additional information to complete the submission.

Once we have verified that you have completed the report, we will send your award via Open Badge Factory.

The reflective report contains both quantitative survey questions and open text boxes to provide information on your experiences as a student representative. To ensure the anonymity of your responses, once we have verified your submission is complete, we will delete your email address and name from the data set.

The quantitative survey questions will allow us to report to our national partner organisations about the experiences of student representatives and help to inform national policy to ensure student representatives are valued and recognised. It will also help us to identify additional training or development opportunities for students and staff.

The open text answers will never be used for any purpose other than verifying you are eligible for the award unless you explicitly opt-in to our new Academic Representation Project. We explain what this means below in section 4.d.

d. Opting-in to the NStEP Academic Representation Project

The NStEP Academic Representation Project will include the development of a short national report on the experiences of student representatives (particularly class representatives). We will use the quantitative survey data from reflective report submissions in this report. However, we will not use the open text data unless you specifically 'opt-in' before you submit your report. Opting-in to have your data included in our analysis for the report will help NStEP to ensure that we can effectively communicate to institutional senior leaders, national policy makers, students' unions, higher education staff, and other students, about the experiences of student representatives.

We will never publish your name or any identifying details in any reporting or publications.

The open text responses will be analysed for patterns, themes, and trends. We will then report on these patterns, themes, and trends to make national and institutional policy makers (both staff and students) more aware of the successes that student representatives have had, as well as to highlight the challenges they face.

When analysing the data, we will not know who submitted an individual submission as names and email addresses will have been deleted from the outset. We will take great care to ensure that any further identifying information contained within the open text responses is 'cleaned' or removed.

6. Will we ever share your personal or anonymised data?

a. Personal details

From time to time your college or students' union may contact NStEP to confirm if you attended or completed any training for their own records. In this instance NStEP will provide your name and verify your participation in our training programme. We will only share this information with a key contact who has responsibility for the training and development of student/class representatives.

We will never share any of your personal details with any other third party, other than the key contacts in your students' union or college mentioned above.

b. Anonymised data

When we refer to 'anonymised data' we mean any data where we have removed identification such as name and email address.

All feedback we receive on our training programme is automatically collected anonymously.

Anonymised data will only ever be provided to a third party (any individual or any organisation apart from NStEP, and our managing partner organisations HEA, QQI, and USI) for student engagement research purposes. Before any transfer of data to a third party, the NStEP Steering Committee (comprised of the three partner organisations) will consider the nature and value of the request. A short agreement will be drawn up with any third party before transfer, setting out the purposes for which the data will be used.

The data will never:

- identify an individual or small group of individuals,

- be sold.
- or be used for marketing purposes.

7. How long will we keep your data for?

We will not retain your email address for more than one year, unless you sign-up for our newsletter separately. This means that emails about any additional training opportunities will cease after one year. We will provide opportunities for you to opt-in to further email contact.

We will need to retain a record of the digital badges (awards) you have received from us. This data will also be held in Open Badge Factory so that your badge remains verified and portable online.

All other identifying data will be deleted after a period of 1-2 years depending on the training or development opportunities you have undertaken.

If you have opted-in to the NStEP Academic Representation Project, we will retain anonymised and cleaned data sets indefinitely.

8. 'Right to be Forgotten'

You have the 'right to be forgotten' (to have your data erased) as set out in General Data Protection Regulations (GDPR) Regulation (EU) 2016/679 under Article 17. If any participant in the training programme wishes to be forgotten, they may request to have all data deleted that NStEP holds in relation to them. We will respond to your request within 30 days.

If you have given your consent for your reflective submission to be included in the NStEP Academic Representation Project we will immediately (within 7 days) delete your personal identifiers (email address and name). This means that we cannot remove your data from the data set after that point, as we would not know who had submitted the data.

9. Your rights:

Your rights as regards the personal data we hold on you depends on the applicable laws in your country of residence.

If you reside in the European Economic Area ("EEA"), you have the right to request that we:

- provide you with information as to whether we process your data and details relating to our processing, and with a copy of your data;
- rectify any inaccurate data we might have about your without undue delay;
- complete any incomplete information about you;

- under certain circumstances, erase your personal data without undue delay;
- under certain circumstances, be restricted from processing your data;
 and
- under certain circumstances, furnish you with the personal data which you provided us within a structured, commonly used and machine-readable format.
- Where we process your personal data solely on the basis of your consent you have the right to withdraw consent in respect of processing personal data.
- You also have the right to lodge a complaint with your data protection supervisory authority.

The exercise of the above rights might be subject to certain conditions and we might require further information from you before we can respond to your request.

If you would like to exercise your rights, please let us know by getting in touch with us at nstep@usi.ie. We will process your request within 30 days of receipt.

10. Queries

All queries regarding this privacy statement should be submitted to the NStEP Programme Manager at nstep nstepmanager@usi.ie.

Appendix A

Reflective Submission – Overview of questionnaire and the data we collect.