



## QAA Privacy Notice

### Who we are

The Quality Assurance Agency for Higher Education ('QAA', 'we' or 'us' or 'our') gathers and processes your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with information regarding your rights and our obligations, and explains how, why and when we process your personal data.

QAA's registered office is at Southgate House, Southgate Street, Gloucester, GL1 1UB and we are a company registered in England and Wales under company number 03344784. We are also a charity registered in England and Wales with Charity no. 1062746 and in Scotland Charity no. SC037786. We and act as data controller and/or data processor when processing your data. Our Company Secretary is responsible for overseeing Data Protection compliance at QAA and can be contacted at [Governance@qaa.ac.uk](mailto:Governance@qaa.ac.uk)

### Information that we collect

QAA processes personal information to meet our legal, regulatory, statutory and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will never collect any unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first.

### QAA collects personal information from the following:

#### Visitors to our websites

- visitors to our websites, which include:
  - qaa.ac.uk
  - heer.qaa.ac.uk
  - accesstohe.ac.uk
  - enhancementthemes.ac.uk
  - TEF and the Reviewer Extranet

#### Enquirers, visitors and survey respondents

- people who email QAA or use our contact us forms
- people who call QAA
- people who contact QAA via social media
- people who respond to a QAA survey or consultation
- visitors to our offices

#### People exercising a statutory right

- people who contact QAA in relation to a data protection subject access request
- people who contact QAA about the processing of their personal data
- people complaining about QAA

## Our Customers

- people who use our services or attend a QAA event
- subscriber community members
- subscribers to QAA News, Enhancement Newsletter or other marketing campaigns
- people who have given us their permission to contact them with information and updates

## Our Colleagues

- our staff
- our board and committee members
- contractors
- volunteers
- people who apply to work with us
- members of QAA working groups

We also collect personal data [to enable us to carry out our statutory duties or regulatory or other responsibilities](#). This can include personal data about:

- people submitting Concerns about providers of higher education
- people taking CPD awards offered by QAA
- the staff, governors, associates, students and external examiners at providers of higher education that we review
- [Learners registered for an Access to Higher Education Diploma](#)

## How we use your personal data

QAA takes your privacy very seriously and will never disclose, share or sell your data without your knowledge; unless we are required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below:

<b>Enquirers, visitors, survey respondents and interested parties</b>	
Purpose of the processing	To respond to enquiries from the public, provide services, inform our products and services and ensure the safety of our visitors.
Legal basis of the processing	<b>GDPR Article 6(1)(f)</b> legitimate interest Processing is necessary for the purposes of providing information to the public; responding to enquiries from individuals; recording these responses; providing consistent and accurate information and advice; ensuring the personal safety of individuals attending our premises.
Categories of personal data collected or processed	Name Job title Personal email address Personal address (correspondents) Employer Telephone number Business email Car registration (visitors)
Any recipient or categories of recipients of the personal data	We do not share the personal details of enquirers.

	<p>Survey respondents' personal details will be processed by the provider of the survey software used to collect their responses. We ensure that the agreements we have in place with such processors contain adequate provisions for the protection of your personal information, and/or that your personal data is only processed in accordance with our written instructions, and you may ask us to see these at any time.</p> <p>QAA uses Mailchimp to conduct mailout communications and will share recipients' email addresses with Mailchimp.</p> <p>We will share visitors' details with the security/reception providers at our offices.</p> <p>If you have given us your permission, we will share your contact details with our trading subsidiary company, QAA Enterprises Ltd.</p>
Details of transfers to third country and safeguards	<p>We conduct <b>mailout communications</b> using Mailchimp, a service provided by The Rocket Science Group LLC, a company based in the United States of America. When you sign up to receive QAA News or our Enhancement Themes Newsletter your contact information may be transferred to Mailchimp in the USA. Read <a href="#">Mailchimp's privacy terms</a>.</p>
The source of the personal data	<p>Provided by data subject or their authorised representative</p>
Retention period	<p>Personal data of enquirers - anonymised at closure of enquiry - enquiry details retained for 1 year.</p> <p>All other information - 3 years</p>
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	<p>The provision of personal information may be part of a contractual requirement, if you are visiting our offices on behalf of a supplier. Provision of personal information may also be a statutory requirement, as it will enable us to discharge our health and safety duties to people attending our offices.</p> <p>In such cases, if you do not provide us with your information, you may be refused entry to our premises.</p>
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	<p>None</p>

### People exercising a statutory right

Purpose of the processing	<p>To give effect to the individual's statutory right, for example:</p> <ul style="list-style-type: none"> <li>- right to access information by using our information request procedure</li> <li>- right to access information by making a subject access request</li> <li>- right to be forgotten</li> <li>- right to rectification</li> <li>- right to restrict processing</li> </ul>
Legal basis of the processing	<p><b>GDPR Article 6(1)(c)</b> Compliance with a legal obligation</p>

Categories of personal data collected or processed	Name Personal address Personal email address Telephone number Business email address Form of Identification (where required)
Any recipient or categories of recipients of the personal data	We will only share your data where we are required to do so by law, or by the Information Commissioner's Office.
Details of transfers to third country and safeguards	None
The source of the personal data	Provided by the individual.
Retention period	Up to 3 years from closure of request.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	The provision of data is part of a statutory requirement.  If you do not provide us with your data, we may not be able to give you the information you request, unless it is already available in the public domain.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None.

<b>Our customers</b>	
Purpose of the processing	To enable QAA to deliver services and provide information effectively.
Legal basis of the processing	<b>GDPR Article 6(1)(b)</b> performance of a contract
Categories of personal data collected or processed	Name Personal email Business email Telephone number
Any recipient or categories of recipients of the personal data	If you have given us your permission, we will share your contact details with our trading subsidiary company, QAA Enterprises Ltd.  QAA uses Mailchimp to conduct mailout communications and will share recipients' email addresses with Mailchimp.
Details of transfers to third country and safeguards	We conduct <b>mailout communications</b> using Mailchimp, a service provided by The Rocket Science Group LLC, a company based in the United States of America. When you sign up to receive QAA News or our Enhancement Newsletter, your contact information may be transferred to Mailchimp in the USA. <a href="#">Read Mailchimp's privacy terms.</a>
The source of the personal data	Provided by the individual or by his/her authorised representative
Retention period	6 years from completion of contract
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	The provision of personal information may be part of a contractual requirement, if you are visiting our offices on behalf of a supplier.  Not providing us with your information may lead to you being refused entry to our premises.

The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.

None

## Our colleagues

Purpose of the processing

To fulfil our contracts of employment.  
To enable resource-sharing with QAA Enterprises, and between companies in the M5 group.

Legal basis of the processing

**GDPR Article 6(1)(b)** fulfilment of a contract  
**GDPR Article 9(2)(b)** employment, social security and social protection legal obligations  
**(Special Category Data only)**

Categories of personal data collected or processed

Name  
Personal address  
Personal telephone number  
Job title  
Personal email address  
Date of birth  
National insurance number  
Tax code  
Bank account details  
Proof of identity  
Employment history  
Education history  
Absence history  
Curricula vitae

**Special Category Data**  
Nationality  
Information and right to work in the UK  
Ethnicity  
Religious and/or spiritual belief  
Gender  
Sexual orientation  
Trade union membership  
Marital status  
Next of kin details  
Dependants  
Health and/or disability information

Any recipient or categories of recipients of the personal data

[HMRC](#)  
[Superannuation Arrangements of the University of London \(SAUL\)](#) and [Universities Superannuation Scheme \(USS\)](#) - Pension providers  
[PS Financials](#) - Finance system  
[Concur](#) - Expenses processing system  
[PCS](#) - Trade union  
[COPE](#) - Occupational Health provider  
Members of the M5 Group  
[Remedyforce](#) - ServiceDesk system  
[Select HR](#) – HR system

In all cases, sharing is limited to the information necessary for the performance of a function.

Details of transfers to third country and safeguards	None
The source of the personal data	Provided by individual
Retention period	Six years from employment or contract end date for employees and contractors. Six months from recruitment decision for unsuccessful applicants. Indefinitely for company directors.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	Processing is necessary as part of a statutory requirement. If you do not provide us with your personal data, we may be unable to fulfil our employment obligations to you. Processing is necessary as part of a contractual requirement. If you do not provide us with your personal data, we may not be able to fulfil our contractual obligations to you.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None

<b>Personal data collected in the course of our statutory duties or regulatory responsibilities</b>	
Purpose of the processing	To safeguard the standards and quality of UK higher education wherever it is delivered around the world
Legal basis of the processing	<b>GDPR Article 6(1)(e)</b> Public interest or exercise of official authority <b>GDPR Article 6(1)(f)</b> legitimate interest Processing is necessary for the purposes of QAA's legitimate interest in standards and quality assurance, and for the discharge of our duties under the Higher Education and Research Act 2017 Processing may be necessary for the purposes of preventing fraud.
Categories of personal data collected or processed	Name Personal email address Telephone number Address Business email Job title Attendance information Academic grades  <b>Special Category Data</b> Nationality Ethnicity Language competency Disability information Right to work/study
Any recipient or categories of recipients of the personal data	We may share information obtained in the course of our review or other activity with other bodies, including: <ul style="list-style-type: none"> <li>the Department for Education</li> <li>the Student Loan Company</li> <li>the Office for Students</li> <li>the Higher Education Statistics Agency</li> <li>the Scottish Funding Council</li> </ul>

	<ul style="list-style-type: none"> <li>the Higher Education Funding Council Wales</li> <li>the Department for Education Northern Ireland</li> </ul> <p>Any personal information shared in this context will only be shared if necessary to give effect to the intention of the sharing. Information sharing is normally covered by an information sharing or non-disclosure agreement.</p> <p>We share information with Deloitte LLP for the purposes of obtaining Financial Sustainability, Management and Governance assurances about providers under review. Such information is shared through a secure upload portal, and its processing is governed by the terms of our contract with Deloitte LLP.</p>
Details of transfers to third country and safeguards	Not applicable
The source of the personal data	Provided by data subject or their authorised representative. Collected in the course of QAA Review.
Retention period	Any personal information gathered during the course of these activities is securely deleted and/or destroyed 3 months after publication of review report to which it relates.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	Processing is necessary for the performance of our statutory and regulatory duties. Failure to provide data compromises QAA's ability to complete the necessary review.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None

### Learners registered for an Access to Higher Education Diploma

Purpose of the processing	<p>To monitor learner registration, achievement and awards across approved Access to Higher Education programmes.</p> <p>To monitor the success of Access Validating Agencies' strategies to promote equality of opportunity between people of different ethnic or racial backgrounds, different religious beliefs, or different states of physical or mental health.</p> <p>To feed into QAA annual publications on Access to Higher Education participation and achievement.</p>
Legal basis of the processing	<b>GDPR Article 6(1)(e)</b> Public interest or exercise of official authority
Categories of personal data collected or processed	<p>Date of birth</p> <p>Age</p> <p>Unique Learner Number</p> <p>Learner Reference</p> <p>Postcode</p> <p>Achievement data</p> <p>Grade information</p> <p>Qualification information</p>

	Destination Source of funding/ funding status Benefit status Employment/prior employment status  <b>Special Category Data</b> Ethnicity Gender Language competency Disability information Learning Difficulty information
Any recipient or categories of recipients of the personal data	Not applicable
Details of transfers to third country and safeguards	Not applicable
The source of the personal data	Provided by <a href="#">Education and Skills Funding Agency, Department for Education</a>
Retention period	Maximum 12 months from receipt, or on completion of purpose.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	Processing is necessary for the performance of our statutory and regulatory duties.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None

## Exercising your rights

If QAA processes personal information about you, you have the **right to access** that information, and to request information about:

- what personal data we hold about you
- the purposes of the processing
- the categories of personal data concerned
- the recipients to whom the personal data has/will be disclosed
- how long we intend to store your personal data for
- if we did not collect the data directly from you, information about the source.

In some cases, if you believe that we hold any incomplete or inaccurate data about you, you have the **right to ask us to correct and/or complete the information** and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You may also have the **right to request erasure** of your personal data or the **right to restrict processing** (where applicable) in accordance with data protection law; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

**If you would like to exercise any of these rights, you can do so by contacting us:**



By email: [enquiries@qaa.ac.uk](mailto:enquiries@qaa.ac.uk)  
By telephone: 01452 557000  
By post: Enquiries, QAA, Southgate House, Southgate Street, Gloucester, GL1 1UB

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

### **Processing for legitimate interests and with your consent**

As noted in the '**How we use your personal data**' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have ensured that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

Where you have consented to us using your details for a particular purpose, we will keep such data until you notify us otherwise and/or withdraw your consent.

### **Processing Special Category Data**

Owing to the nature of our responsibilities and statutory duties, we may sometimes need to process sensitive personal information (known as special category data) about you. This may be for the purposes of assessing the efficacy of the policies and procedures of the Higher Education providers we review, or to enable us to investigate complaints or concerns. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

### **Lodging a complaint**

QAA only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority. In the first instance, complaints should be directed to:

Company Secretary, QAA  
Southgate House, Southgate Street, Gloucester, GL1 1UB  
01452 557000  
[governance@qaa.ac.uk](mailto:governance@qaa.ac.uk)

If you remain concerned that your information has not been handled as described, you may raise your complaint with the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
0303 123 1113  
<https://ico.org.uk/concerns/handling>

## Use of cookies by QAA websites

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, remember your individual settings and preferences, and to measure how you use websites to ensure they meet your needs.

We do not use cookies to identify individuals or collate personal data. We only use cookies to make our sites work better for you.

Most web browsers allow some control of cookies through the browser settings, and you are able to manage and delete cookies from specific websites.

To find out more about cookies, including how to see what cookies have been set by the websites you visit, and how to manage and delete them, visit [All About Cookies](#).

The table below explains the cookies we use on each website and why.

[www.qaa.ac.uk](http://www.qaa.ac.uk)

Cookie	Name	Purpose	More information
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. This information is used to improve QAA's sites and to ensure they meet your needs.  All data is collected in an anonymous form and includes information such as the number of visitors to our websites and the pages they visit while they're on our sites.	<a href="#">Overview of privacy at Google</a>  <a href="#">Opt out of Google Analytics</a>
Google cookies	GAPS khcookie NIDS PREF VISITOR_INFO1_LIVE YSC	We use the YouTube video player and Google Maps functionality on our website. These are cookies set by Google to store your user preferences.	<a href="#">Overview of privacy at Google</a>
BrowseAloud	Browsealoudcountry country	We subscribe to a service called BrowseAloud, which allows our website visitors to use the BrowseAloud toolbar for free.	<a href="#">BrowseAloud website</a>
Standard ASP.NET cookie	ASP.NET_SessionId	Created when session state is used. Expires when the browser closes.	All About Cookies: <a href="#">What is a session cookie used for?</a>

Cookie	Name	Purpose	More information
Cookie acceptance	acceptcookies	On first visiting our website, you will see a message at the top of your screen explaining that we use cookies. If you click to accept and hide the message, a cookie is stored so that you will not see the message appear again when you visit the website. Set to expire after 100 years.	
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. This information is used to improve QAA's sites and to ensure they meet your needs.  All data is collected in an anonymous form and includes information such as the number of visitors to our websites and the pages they visit while they're on our sites.	<a href="#">Overview of privacy at Google</a>  <a href="#">Opt out of Google Analytics</a>
Google cookies	GAPS khcookie NIDS PREF VISITOR_INFO1_LIVE YSC	We use the YouTube video player and Google Maps functionality on our website. These are cookies set by Google to store your user preferences.	<a href="#">Overview of privacy at Google</a>
Session cookie	f	Stores the font size, if you have selected one of the options provided in the accessibility menu. Set to expire after 20 minutes.	All About Cookies: <a href="#">What is a session cookie used for?</a>
Session cookie	homepage_imageno	This cookie refreshes the image that appears in the top right-hand corner of the Access to HE homepage. It is purely for design purposes. Set to expire after 40 minutes.	All About Cookies: <a href="#">What is a session cookie used for?</a>
Session cookie	accessibility	Stores the contrast setting you have selected while using the website. Set to expire after 20 minutes.	All About Cookies: <a href="#">What is a session cookie used for?</a>
Session cookie	LoggedIn	Stores your email address if you are logged in to the AVA area, so that it displays in the main navigation throughout your visit. Set to expire	All About Cookies: <a href="#">What is a session cookie used for?</a>

		after 30 minutes or cleared when you log out.	
Standard ASP.NET cookie	ASPXAUTH	Created and set when you log in to the AVA area. Expires when the browser closes.	All About Cookies: <a href="#">What is a session cookie used for?</a>
Standard ASP.NET cookie	ASP.NET_SessionId	Created when session state is used. Expires when the browser closes.	All About Cookies: <a href="#">What is a session cookie used for?</a>
Session cookie	ASPSESSIONID	Session cookies store information about particular choices you have made during your visit to the website - for example your preferred language choice if you have selected a Welsh language page.  These cookies expire when you close your browser.	All About Cookies: <a href="#">What is a session cookie used for?</a>

[heer.qaa.ac.uk](http://heer.qaa.ac.uk)

Cookie	Name	Purpose	More information
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. This information is used to improve QAA's sites and to ensure they meet your needs.  All data is collected in an anonymous form and includes information such as the number of visitors to our websites and the pages they visit while they're on our sites.	<a href="#">Overview of privacy at Google</a>  <a href="#">Opt out of Google Analytics</a>
Standard ASP.NET cookie	ASPXAUTH	Created and set when you log in to the AVA area. Expires when the browser closes.	All About Cookies: <a href="#">What is a session cookie used for?</a>
Standard ASP.NET cookie	ASP.NET_SessionId	Created when session state is used. Expires when the browser closes.	All About Cookies: <a href="#">What is a session cookie used for?</a>

Twitter cookies	_guestid remember_checked_on twll _twitter_sess	These cookies are set by Twitter as a result of the integration of a Twitterfeed on our website.	<a href="#">Overview of privacy at Twitter</a>
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[reviewextranet.gaa.ac.uk](http://reviewextranet.gaa.ac.uk)

Cookie	Name	Purpose	More information
Session cookie	WSS_KeepSessionAuthenticated	Session cookies store information about particular choices you have made during your visit to the website. This cookie keeps you authenticated - or logged in - throughout your visit to the site so that you only have to log in once.  This cookie expires when you close your browser.	All About Cookies: <a href="#">What is a session cookie used for?</a>
Standard ASP.NET cookie	ASP.NET_SessionId	Created when session state is used. Expires when the browser closes.	All About Cookies: <a href="#">What is a session cookie used for?</a>