Data Privacy Impact Assessment

HEA - Student Records System, Equal Access Survey and Graduate Outcomes Survey

List of Acronyms

CSO - Central Statistics Office

DEASP - 'Department of Employment Affairs and Social Protection'

DES - 'Department of Education and Skills'

EAS - 'Equal Access Survey'

GDPR - 'General Data Protection Regulation 2016/679'

GOS - 'Graduate Outcomes Survey'

HEI - 'Higher Education Institution'

PPSN - 'Personal Public Service Number'

SRS - 'Student Record System'

SUSI – 'Student Universal Support Ireland'

1.   INTRODUCTION

This Data Privacy Impact Assessment has been drafted in line with Article 35 of the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018. The purpose of this document is to consider the risks with respect to data privacy issues relating to the personal data that is held and used by the HEA in the fulfilment of its statutory functions. This impact assessment was conducted in co-operation with the Statistics Unit of the HEA by O'Dowd Solicitors and represents a full and accurate account of the processing conducted by that Unit to the best of the knowledge of all concerned.

1.1.   FUNCTION OF THE HEA

The HEA is primarily governed by the Higher Education Act 1971. Certain amendments have been made to this throughout the years, the most noteworthy being Section 52 of the Institutes of Technology Act 2006.

The HEA Act, 1971 states that the general functions of the HEA are:

(a) furthering the development of higher education,

(b) assisting in the co-ordination of State investment in higher education and preparing proposals for such investment,

(c) promoting an appreciation of the value of higher education and research,

(d) promoting the attainment of equality of opportunity in higher education,

(e) promoting the democratisation of the structure of higher education.

Further to this, the Institutes of Technology Act 2006 provided that "In performing its functions, An tÚdarás shall have regard to the national aims of maximising the contribution of higher education to social and economic progress, restoring the Irish language and preserving the national culture, and shall endeavour to promote the attainment of those aims.".

1.2.   DATA USE AND THE HEA

To fulfil its legislative obligations the Higher Education Authority (HEA) requires an evidence base. This evidence base is provided by gathering individual student level data from the Higher Education Institutions. The primary database maintained in this respect is the Student Records System (SRS). Other datasets maintained by the HEA include the Equal Access Survey (EAS) and the Graduate Outcomes Survey. All details of third level students are returned to the SRS, while the EAS is voluntary. The HEA does not currently collect personally identifiable data in the Equal Access Survey and as such it falls outside the definition of Personal Data in Regulation 2016/679 and the scope of the DPIA.

Currently data is required for the following purposes:

- Trend analysis for annual publications on enrolments and graduates, by student and institute characteristics
- Annual progression analysis of new entrants, by student and institute characteristics

- Annual graduate outcomes analysis, by student and institute characteristics
- To inform funding allocation to HEA funded higher education institutions
- Annual analysis of equity of access metrics of our HE cohort
- Forecasting future enrolment and graduate numbers
- Reporting higher education data to international agencies such as the OECD, UNESCO and Eurostat
- Providing data to the Department of Education and Skills to inform their decision-making processes and forecasting analysis
- Provide SUSI with data to inform grant application decisions
- To provide data to the CSO under the Statistics Act 1993
- To measure degree outcomes for students
- To track students for completion rate analysis

Should the HEA not be in a position to gather such data at an individual level it would not be able to fulfil its obligations at a national and international level.

1.3.   DATA PROTECTION LANDSCAPE

The HEA has engaged specialist advisors and undertaken the following actions in relation to data protection compliance concerns:

A Data Protection Officer has been appointed and one member of staff has worked on co-ordination of GDPR implementation measures and this staff member has undertaken training to this end[1]. There has also been a review of data controller/processor contracts and agreements, increased use of Data Privacy Impact Assessments, internal mentoring, training courses and documentation has been created to aid this process. Within IT security, a number of Data Privacy Impact Assessments have also been carried out and a full GDPR Gap analysis is currently underway in the organisation.

There has been much change in relation to the security of IT systems, including use of encryption and more security conscious email systems. Data privacy implications are now considered prior to the implementation of any IT projects within the HEA.

2.   WHAT DATA DOES THE HEA PROCESS?

2.1.   GENERAL

This section of the DPIA will provide a systematic description of the processing operations and the purposes of the processing within the Statistics Unit of the HEA. It does not purport to cover all

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[1] Mr Padraic Mellet is currently the assigned DPO in the HEA (March 2019). O'Dowd Solicitors are currently providing legal advice to the HEA on data protection issues.

instances of data processing within the HEA giving the broad remit of the organisation and the number of statutory and non-statutory schemes it administers.

As set out in clause 1.2 above there are three primary datasets collected by the HEA. The three of most importance for the purposes of this report are the following;

- Student Record System
- Equal Access Survey
- Graduate Outcome Survey

Since the introduction of Regulation 2016/679 the Equal Access Survey is now returned on an anonymous basis to the HEA. While the residual risks of identification are noted even in anonymous data, measures are taken to insure no identifiable data can ever be released.

The SRS comprises data collected from the higher education institutions on an annual basis. It is not voluntary. The HEIs return the data fields as set out in Appendix 1. Students are informed of the existence of the SRS in the Student Data Collection Notice, which is issued annually.

2.2.   THE TYPES OF DATA HELD BY THE HEA STATISTICS UNIT

The Student Records System (SRS)

The SRS is the HEA student database containing administrative student data. The fields collected together with the purpose for collecting same are set out in Appendix 1.

This data is returned to the HEA each year from HEA funded higher education institutions. The data retained goes back as far as 2004. This is the main source of data for higher education statistics in Ireland and is used to provide evidence in support of higher education policy making. There are hundreds of thousands of individual identifiable student records in the SRS, with dozens of student, course and institute level variables.

Graduate Outcomes Survey

This is an annual voluntary survey of graduates from HEA funded higher education institutions, nine months after graduation. The survey is conducted by each higher education institution and data is returned to the HEA. Data are collected and stored at individual identifiable level. The data collected is set out in Appendix 1.

The Equal Access Survey (EAS)

The EAS is an annual voluntary survey of first year undergraduate new entrants to HEA funded higher education institutions. The survey is conducted by each higher education institution and data is returned to the HEA in an anonymous manner since the introduction of Regulation 2016/679. Variables include disability status, ethnicity, parents' occupations and derived socioeconomic class/group.

2.3. PROCESS OF COLLECTING INFORMATION

The Student Records System (SRS)

At registration for the HEI they will be attending, the student gives data which forms the basis of the SRS dataset. They are furnished with the data collection notice in being for that year, which applies to the SRS, EAS and GO datasets.

Graduate Outcomes Survey

In respect of the GO Survey, the relevant student is contacted 9 months post-graduation by the HEI to fill out the survey. It is conducted on a voluntary basis.

The Equal Access Survey (EAS)

The EAS is conducted by the individual HEI on a voluntary basis and data is returned to the HEA on an anonymous basis and cannot be linked to any other information held by the HEA.

2.4. TRANSFER OF DATA FROM HEI TO HEA

The HEA rarely collects information directly from the data subjects. The primary means by which the HEA collects personal data is from HEIs. To effect this, each institution creates XML files, which constitute the categories of data that they are processing on behalf of the HEA. The data is then uploaded to a portal system. Approximately half the HEIs use 'Banner' and the other half use a variety of different portals. Access is by username and password which are emailed or conveyed over the phone to the relevant institution. Dataset cleaning and audits are carried out by the HEA, and after consultation with the HEI and sign off on the audit by a senior member of staff in the HEI, the HEA begins work on the dataset.

The data is loaded into the SRS system through the HEA portal. The HEA Portal is used over HTTPS and is 256-bit encrypted. The portal does not allow the institution to access the data; the only functions are to upload or take down the data. There is then a sign off function, which can be initiated only by HEA staff upon the agreement of the institution. This function may be undone by the HEA staff but unless this occurs the Institution does not have access to the files on this portal until they are eventually uploaded to another portal by the HEA. It is via this second portal that the HEA shares data with the relevant HEI, by giving them access to it.

Any rectification of data by the HEA is done by reference to student ID or PPSN. Data is uploaded using a file sender facility maintained in a secure manner by the HEA within the European Union.

It is noted that some concern has been raised by HEIs with respect to the use of the PPSN by them and the HEA. This is addressed in more detail in paragraph 4.2.

In accordance with the Data Sharing and Governance Act 2019, compliance data sharing agreements have been drafted for the transfer of information. These are due to be signed in the immediate future.

2.5. WITH WHOM DOES THE HEA SHARE PERSONAL DATA?

The primary purpose the HEA has for collecting data is for statistical analysis in furtherance of its statutory obligations and to inform funding and other decisions made by the HEA. The HEA via its portal system shares personal data relevant to a HEI, with that HEI. The HEA also shares personal data with the following Government departments and public bodies.

Student Universal Support Ireland

There is a data sharing agreement in being between the HEA and the City of Dublin Education and Training Board (CDETB), who operate the Student Support Scheme in accordance with the Student Support Act 2011. The SUSI data sharing agreement has its lawful basis under section 28 of the SSA 2011. It is provided for therein for the data controllers of prescribed persons listed in Schedule 2 to the Act or otherwise prescribed as such by regulation under Section 28(2) of the Act to process personal data for the relevant purposes of that Act. The HEA and SUSI are bodies listed in Schedule 2 of the SSA 2011.

Central Statistics Office

Data is shared with the CSO pursuant to the Statistics Act 1993 and a memorandum of understanding dated 4th February 2015.[2]

Department of Employment Affairs and Social Protection

In accordance with Government policy, the PPS number is used as the unique identifier on HEA databases. This allows for a continuity of statistical analysis and allows databases to be maintained accurately as well ensuring that there are no duplicate records in the system. The PPS number obtained is validated using the Department of Employment Affairs and Social Protection PPSN client identity service. This is an automated process which validates large batches of PPS numbers using other variables from the Public Service Identity dataset, and returns a match code to the HEA.

Department of Education and Skills

Certain sharing of information is permitted by virtue of Section 266 of the Social Welfare Consolidation Act 2005 as set out in the Social Welfare (Consolidated Claims, Payments and Control) Regulations 2007 and as amended by Social Welfare (Consolidated Claims, Payments and Control) (Amendment) (No. 4) (Sharing of Information) Regulations 2015. At present no sharing of microdata takes place between the HEA and the DES.

Data processors

The HEA shares certain personal data with other organisations acting as processors, subject to appropriate data processing agreements and due diligence.

Anonymised sharing

The HEA also shares statistical data with other Government departments who may benefit from same. This data is not personal data within the definition of Regulation 2016/679. Such aggregated data is

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[2] https://www.cso.ie/en/media/csoie/aboutus/documents/HEA_MOU_2015_Signed_version.pdf

shared in a form where the data subject is not identifiable and is shared from the SRS, Equal Access Survey and the Graduate Outcomes Survey.

3. NECESSITY AND PROPORTIONALITY OF THE PROCESSING OPERATIONS

3.1. NECESSITY

Statistical Analysis

In order to formulate an effective higher education policy, it is necessary for the HEA to provide analysis of higher education student enrolments, new entrants and graduates each year. It is necessary to conduct analysis of student progression from first year to second year annually. In order to determine the efficacy or otherwise of higher education courses it is necessary to gather graduate outcomes. Furthermore, the equal access survey provides invaluable data on students socio-economic backgrounds. Without the statistics gathered by the HEA it would not be possible for the body to provide high quality evidence-based policy advice to the government across all aspects of obligation.

Funding

The HEA allocates close to a billion in State funds annually through what is called the Recurrent Grant Allocation Model – RGAM. The current funding allocation was put in place for the universities from 2006, and on a phased basis for the Institutes of Technology (IoTs) from 2009. The majority of third level funding, excluding fees, is made by reference to audited student numbers and classifications.

The block grant, which is funding allocated as a single grant allocation to Higher Education Institutions (HEIs) comprises two elements; the first being the core recurrent grant allocated through a funding formula. The formula is driven by audited prior-year student numbers. These are weighted for the relative costs of providing education in different disciplines. There are additional weightings for research and for access. The second element to the block grant is the 'free fees grant', which has been provided 'in lieu of tuition fees' since the introduction of the free fees scheme.

Included within the above grants are weightings for research and access to certain societal groupings; the information in respect of which is gleaned from student level data collected by the HEA.

Without the knowledge of students performance through the various higher education institutes it would not be possible for the Higher Education Authority to fulfil its statutory obligations. Except in very specified and explicit circumstances, the HEA does not concern itself with individual data pertaining to identifiable students, however it requests such a level of information in order to correctly process and audit the information held. It is for that reason that the HEA is strongly of the opinion that its processing is necessary for the achievement of these aims.

3.2. PROPORTIONAILTY

It is viewed by the HEA that the information collected and any potential adverse consequences to individuals rights is proportional to the benefits of the funding models, statistical and policy analysis or other processing that is carried out. The importance of the information gathered is detailed in the examples below:

a) The detail in the dataset allows the HEA to assess the benefits of the educational system in a more holistic way. For example, Arts graduates earn less on average than graduates from other disciplines initially but after completing postgraduate studies earn more than graduates from many other disciplines. This analysis is done via matching data held by the HEA with Revenue Commissioners data, linked via PPSN (such processing is carried out by the CSO; no individual level Revenue Data is shared with the HEA).

b) Requests may be made at governmental level for the purposes of informing the allocation of resources. If there is a shortage of a certain type of worker, the HEA may be in a position to analyse how many have been trained in the past, how many still work in the role in Ireland, and be able to give some indication as to the necessity of training moving forward, informing the process of fund allocation by the Government and by individual institutions also.

c) The Department of Education and Skills may in conjunction with the HEA make projections of how many students will attend college each year by combining datasets of those who have left school and enrolled in a HEI.

The purpose and need for the collection of each item of data is set out in Appendix 1 to this assessment. The HEA routinely review datasets for excessive or irrelevant information and the types of data collected is reviewed annually in accordance with society and educational changes.

4.   LEGAL BASIS FOR COLLECTING AND PROCESSING DATA

The relevant legislation in relation to the data processing that involves the work of the HEA are the following;

- The Higher Education Authority Act 1971
- Social Welfare Act 2005
- Social Welfare (Consolidated Claims, Payments and Control) Regulations 2007 (142/2007)
- Social Welfare (Consolidated Claims, Payments and Control) (Amendment) (No. 4) (Sharing of Information) Regulations 2015 (SI 317 of 2015)
- Universities Act 1997
- Institutes of Technology Act 2006
- Technological Universities Act 2018.

Section 3 of the Higher Education Authority Act 1971 outlines the statutory functions of the HEA which include:

(a) furthering the development of higher education,

(b) assisting in the co-ordination of State investment in higher education and preparing proposals for such investment,

(c) promoting an appreciation of the value of higher education and research,

(d) promoting the attainment of equality of opportunity in higher education,

(e) promoting the democratisation of the structure of higher education.

The HEA Act provides that the HEA is the gatekeeper for the public funding of higher education. The HEA is the regulator with responsibility for allocation and oversight of public funding for institutions and makes recommendations to Government in relation to the funding that any particular institution may need. The HEA releases funding to institutions on behalf of the Government.

The HEA analyses data in order to evaluate the success of higher level education in the long term, as well as the success of specific schemes within its remit. Another function is to assist other State bodies in their role advising the Government in relation to third level funding and policy. Such processing as aforementioned is a necessary component of the HEA in discharging its statutory duties.

Except in very limited circumstances the HEA does not collect information direct from data subjects. Most information obtained by the Statistics Unit is obtained from various higher education institutes. These institutes for the most part are established pursuant the Universities Act 1997, Institutes of Technology Act 2006, and more recently the Technological Universities Act 2018.

The primary legal basis upon which the HEA obtains data from the HEIs is to be found in Section 11 of the Higher Education Authority Act 1971. This provides that

'An institution of higher education shall supply to An tÚdarás all such information relative to the institution as An tÚdarás may require for the purpose of performing its functions.'

Article 6 of Regulation 2016/679 provides for certain preconditions be met before processing can be considered lawful. The lawful basis for each database is considered in turn.

The Student Records System (SRS)

Article 6(e) provides that processing is lawful where it is *"is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;"*. The HEA will maintain that in order to fulfil its statutory functions in Section 3 of the Higher Education Authority Act 1971 such processing is a necessity.

Graduate Outcomes Survey

Article 6(a) provides that processing is lawful where *"the data subject has given consent to the processing of his or her personal data for one or more specific purposes;"*. Given that this is a voluntary survey, its existence is publicised by the publication of an annual data collection notice, and considering there are no adverse implications for individual who do not participate it is considered by the HEA that Article 6(a) is a lawful basis to conduct the processing.

The Equal Access Survey (EAS)

The EAS is conducted by the individual HEI on a voluntary basis and data is returned to the HEA in an anonymous basis and as such it is felt no further investigations are warranted as respect the legal basis for collection.

It is the stated view of the HEA that along with such specialised processing carried out for statistical purposes it is permitted to rely upon Section 38 of the Data Protection Act 2018 as regards the lawfulness of processing carried out by the body.

> *38. (1) The processing of personal data shall be lawful to the extent that such processing is necessary and proportionate for—*
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> *(a) the performance of a function of a controller conferred by or under an enactment or by the Constitution, or*
>
> *(b) the administration by or on behalf of a controller of any non-statutory scheme, programme or funds where the legal basis for such administration is a function of a controller conferred by or under an enactment or by the Constitution."*

It is further maintained by the HEA that it may rely upon section 49 of the 2018 Act where it is deemed necessary to process special categories of personal data.

4.1. LEGAL BASIS FOR USAGE OF THE PERSONAL PUBLIC SERVICE NUMBER AND PUBLIC SERVICE IDENTITY

By virtue of Section 262 of the Social Welfare (Consolidation) Act, 2005 it is an offence for anyone other than a specified body to use a PPSN. The HEA is a specified body. Furthermore Section 266 of the Social Welfare (Consolidation) Act, 2005 provides that

"Notwithstanding anything contained in any other enactment, a specified body may share any information that may be prescribed with— an tÚdáras um Ard-Oideachas, where that body requires the information for the purpose of performing its functions under section 3(a), (b) or (d) of the Higher Education Authority Act 1971"

SI 317 of 2015 prescribes certain information that may be shared. In the context of the PPSN and Public Service Identity this includes but is not limited to:

> *(I) forename,*
>
> *(II) surname,*
>
> *(III) date of birth,*
>
> *(IV) address,*
>
> *(V) sex,*
>
> *(VI) nationality,*

(VII) personal public service number, and

(VIII) mother's birth surname,

4.2. COLLECTION OF DATA BY HEIS ON BEHALF OF THE HEA

It is noted that some concern has been raised regarding the legal basis upon which the HEI's collect data; in particular the information comprised in the Public Service Identity. The HEA is satisfied that HEIs are defined as specified bodies within the definition of Section 262 of the Social Welfare (Consolidation) Act, 2005. As such they enjoy the same rights to use the PSI as the HEA, and in particular it is noted that Section 262(6)(c) provides that a *"specified body may use a person's public service identity in preforming its public functions insofar as those functions relate to the person concerned".*

It is further noted that Section 262(4) provides that *"a person shall give to a specified body his or her personal service number and the personal public service numbers of his or her spouse and children, where relevant, as required by the body for the purposes of the persons transaction".*

In reliance upon the above the HEA requires all HEIs to obtains PPS number of students where such are issued and readily available.

4.3. DATA SHARING AND GOVERNANCE ACT 2019

It is noted that Section 13 of the Data Sharing and Governance Act 2019 gives a generalised legal basis for the sharing of information where there is no other enactment or law under which specific provision is made permitting or requiring such data sharing. While at present the HEA does not rely upon the Data Sharing and Governance Act given the existence of the 1971 and 2005 Acts, it may in the future seek to rely on the provisions of the Act should the need and circumstance arise.

4.4. FRAMEWORK FOR PROCESSING STATISTICAL DATA

Along with the general provisions of Section 38 of the Data Protection Act 2018 in the context of this DPIA it is noted that the data processed is so done for the purpose of statistical purposes (which for the avoidance of doubt includes such funding models informed by reference to information gathered from the HEIs relating to numbers and classes of students), and thus falls within the derogations of Article 89 of Regulation 2016/679. It is noted that Section 42 of the Data Protection Act 2018 provides:

(1) Subject to suitable and specific measures being taken to safeguard the fundamental rights and freedoms of data subjects, personal data may be processed, in accordance with Article 89, for—

…

(c) statistical purposes.

(2) Processing of personal data for the purposes referred to in subsection (1) shall respect the principle of data minimisation.

(3) Where the purposes referred to in paragraph (a), (b) or (c) of subsection (1) can be fulfilled by processing which does not permit, or no longer permits, identification of data subjects, the processing of information for such purposes shall be fulfilled in that manner.

It is further confirmed that in accordance with recital 162 of Regulation 2016/679 the result of processing for statistical purposes is not personal data, but aggregate data, and that this result or the personal data are not used in support of measures or decisions regarding any particular natural person save for the limited circumstances set out above in paragraph 2.5.

4.5.   MEASURES TAKEN TO SAFEGUARD RIGHTS AND FREEDOMS

At all times the HEA notes that it endeavours to respect the principle of data minimisation, that is to say not to collect more information than is necessary for a given purpose. It should however be noted that in order to realise value from statistical analysis it is necessary to collect a broad spectrum of information at individual student level.

On one end of the scale, the HEA makes generic information available to the public on its website which provides an invaluable resource for those with a specific interest in the third level sector.[3]

More granular information is produced for specific bodies. The HEA has controls on minimum numbers of people it reports on, and decisions on the release of statistics which effect a small sample of people are made on a case by case basis having regard to individuals right to privacy.

Note however some concerns in this respect in paragraph 5.3.

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[3] *http://hea.ie/statistics/*

5. RISKS IDENTIFIED & RECOMMENDATIONS

5.1. RISK OF DATA BREACHES

A data breach is a risk for any organisation, and more so in the case of an organisation which holds substantial datasets on named individuals.

It is noted from the investigations of the authors that the HEA have taken then following steps:
- SRS and GO front ends were upgraded to an APREX REST server with https 256-bit encryption.
- Access to these front-ends are password protected and ring-fences access to data only to the institute that submitted that data.
- Access to BI Tool is restricted to HEA employees and controlled by passwords.
- Back-End Access to database is limited to IT staff.
- Firewall has in built protection from SQL injection attacks.
- Connections to the SRS/GO front ends are over encrypted SSL links.
- The SRS and GO front ends are located in the DMZ. The data that the front ends references are in the local LAN. This separation of data from the internet helps security.
- Access to both front ends are controlled by the Sonicwall firewall.
- Backups of the data is carried out daily and stored offsite.
- Physical access to the servers is limited to IT support staff.
- Data that is retrieved and put in email/word/excel can be encrypted using the Azure Rights Management tool.

It remains the case however that any organisation holding substantial data is at risk of a data breach.

Suggested Remediation

Data security should be a high priority for the organisation. Suitable IT Security consultants should be commissioned to report on the data security topography and issue recommendations. All access to data should be logged. All data should be encrypted where possible. With suitable due diligence and preparedness any data breach will be easier to deal with and there will be a lower risk of having to invoke the notifications provisions of the GDPR.

5.2. LACK OF FULL OVERVIEW OF GDPR POSITION

While various consultants have been retained by the HEA over the past number of years, the organisation would benefit from a thorough analysis of data protection policies and procedures.

Suggested Remediation

It is understood that the HEA recently concluded a tender for a full data protection gap analysis to be carried out. The conclusion of such a report is likely to yield a benefit in regard to having an organisation wide overview.

5.3. MEASURES TAKEN PURSUANT TO S42 DPA 2018

Section 42 of the Data Protection Act 2018 considers that "*suitable and specific measures being taken to safeguard the fundamental rights and freedoms of data subjects"* where it is processed for statistical

purposes. Article 6 of Regulation 2016/679 also countenances such "*suitable and specific measures*" in the context of establishing a lawful basis for processing.

Thankfully there appears to be written agreements in place between the HEA and bodies with whom non-statistical information is shared which appear to have suitable and specific measures and a definitive legal basis for onwards sharing.

In the context of the Statistics Unit it is viewed that while *ad hoc* and casual measures are in place, there are no written or formulated guidelines with respect to suitable and specific measures that might inform HEA staff to safeguard the fundamental rights and freedoms of data subjects.

It is noted that granular datasets may result in the identifying of individuals in "de-personalised" statistical data and this must be kept in mind in all aspects of the work of the HEA. It emerged in interview that there is no clear policy with regard to the least amount of data that is being processed at any given time by HEA staff. For instance, it was stated in interview that 10 people may be the least that are reported on. It is not clear whether this is an internal guideline or whether this is a CSO guideline which has been adopted by the HEA staff. The HEA staff in outlining their roles and the data used believe that they are in fact working in a way which is consistent with international best practice in order to best fulfil their function.

Suggested Remediation

It is recommended that a clear policy be drafted within the HEA, addressing measures in order to protect the data subject in this regard. Particular note should be taken of the Data Protection Act Section 36 which details such measures which can be taken. While it is noted that certain measures have been taken, and are set out in paragraph 5.1 above, it would seem more consideration should be given to addressing these specific concerns.

Article 32 of GDPR specifically outlines pseudonymisation as a security measure to protect the confidentiality of an individual's personal data. Where possible, it would be advisable to ensure personal data is pseudonymised with any identifying key kept separate.

It is suggested that internal guidelines be proposed and adopted to ensure that no graduate/student level data is ever disclosed save in accordance with law. This should encompass best practice with respect to data security and statistical processing in accordance with Section 36, and this should be completed as a matter of urgency.

5.4.   PROCESSING OF SPECIAL CATEGORIES OF PERSONAL INFORMATION

This concern follows from that in paragraph 5.3 insofar as it is unclear if suitable and specific measures being taken to safeguard the fundamental rights and freedoms of data subjects, are taken when special categories of personal information are processed under section 49(b) of the Data Protection Act 2018.

Suggested Remediation

It is likely in forthcoming GDPR reviews that detailed data mapping will be carried out so that the HEA can establish a) what special categories of personal data are collected, if it is necessary and

proportionate to do so, and what measures should be taken in respect of same. For now it is understood that all data processed is treated with the same level of care.

5.5.   ANTIQUATED LEGISLATIVE FRAMEWORK

It is the view of the HEA and external advisors that, while adequate for the processing which is undertaken, the statutory regime regulating the interaction with the HEA and the data it processes does not always inspire confidence and it should be updated to take account of developments since 1971.

Suggested Remediation

Much work has been carried out in this area already and it is likely that in the future the legislation underpinning the HEA will be updated. It is not within the gift of the HEA to pass new legislation, however work has commenced in this respect. In the meantime the HEA will continue to rely upon the legislation as set herein out to collect and process information in line with legal advice.

5.6.   FAIR OBTAINING OF SRS DATASET

HEIs collect SRS data on behalf of the HEA from students at registration. Articles 13 and 14 of Regulation 2016/679 mandate that fair processing information be provided to data subjects at the point of collection of data. Any lack of clarity in ensuring this data is provided to the students at registration could risk lack of fairly obtained information. This may put the lawful basis for processing data at risk.

Suggested Remediation

It is recommended that the HEA engage with any relevant HEI on this point and that a correct agreement be drawn up and signed by both parties outlining the obligations of the HEI in this regard and the implications of same.

Any HEI that the HEA does transfer data with should be subject to an appropriate contract which outlines the respective roles and responsibilities of the controller-processor environment, which includes elements of joint or co-control and processing by both parties.

5.7.   REPUTATIONAL RISK ARISING FROM LACK OF CLARITY OR TRANSPARENCY AROUND PROCESSING

The risks as outlined in relation to the legislative basis upon which the HEA is processing, the lack of data sharing agreements and the data subjects right to object should be remedied in an adequate fashion in order to mitigate this potential risk.

Any lack of transparency or communication to the data subjects on behalf of the HEA could risk giving rise to a perception of coerciveness or unwarranted invasion of data privacy rights of data subjects which brings the risk of reputational damage to the HEA.

Suggested Remediation

Provide a clear webpage outlining what, and how the HEA conducts its affairs with respect to personal data which should incorporate the Student Data Collection Notice.

5.8. PPSN

While there are many ways that a data subject may be re-identifiable, there is a particular focus here on the use of PPSN by the HEA in the fulfilment of its tasks as there is a heavy reliance on PPSN for the verification of identity of students.

Suggested Remediation

Further IT security advice should be sought to restrict access to PPSN data both externally and internally.

5.9. LACK OF OR INSUFFICIENT JOINT CONTROLLER AGREEMENTS

Article 26 of the General Data Protection Regulation and Section 79 of the Data Protection Act 2018 stipulate that joint controllers shall in a transparent manner determine their respective roles and responsibilities for processing personal data. The exercising of the rights of the data subject and the respective duties of the parties to provide fair processing information to the data subject should be outlined.

Suggested Remediation

It is recommended that the HEA have joint data controller agreements in place with respect to all bodies with which it jointly processes data, outlining the roles and responsibilities that are part of their relationship relating to personal data. It is understood that this process is in train with a number of agencies, but renewed work should be done in this respect.

5.10. LACK OF OR INSUFFICIENT DATA SHARING AGREEMENTS

The Data Sharing and Governance Act 2018 provides for a generalised legal basis for the sharing of data between public bodies and there is likely to be increasing interest in data sharing generally. The lack of data sharing agreements between the HEA and HEIs, particularly in the context where much information is gathered from the HEIs, is at present sub-optimal.

Suggested Remediation

Data sharing agreements between the HEA and HEIs should be put in place to regularise the relationship between the parties before the 2019 intake of students.

5.11. RISK OF INSUFFICIENT DATA PROCESSOR AGREEMENTS

Subject to Section 80 of the Data Protection Act 2018 and Article 28 GDPR, data controllers are required to have binding contractual agreements in place with processors, guaranteeing certain standards around the security of data in line with the data security principle. Under GDPR, the requirements for data processor contracts are greatly expanded to ensure compliant processing of data. It appears in some cases there are no data processor agreements in place.

Suggested Remediation

It is recommended that the HEA identify all processors of personal data on their behalf and that adequate agreements be drawn up in order to satisfy the legislative requirements under GDPR. It is

understood that this process is in train. However, without same the HEA may be in breach of GDPR and the Data Protection Act 2018.

APPENDIX 1

FULL LIST OF SRS FIELDS 2018/19:

Field	Description/Rationale for Collection
Return Year	The year in which the return is submitted to the SRS, e.g. March 2019 return year is 2019. Required to know the year/time period of the data returned.
Institute Code	This is the identifier for the institute and must correspond to a code on the list supplied by the HEA. Required to identify the institute the data relates to.
Academic Year	Programmes for students must be assigned the current academic year. Programmes for graduates must be assigned the previous academic year. Required to identify the academic year the data relate to.
Programme Name	A programme name relates to the area of study that a course belongs to e.g. Bachelor of Engineering, Bachelor of Arts, Diploma in Business Studies. Required to identify the programme for correct classification and analysis.
Programme Code	This is the code which will be provided by the institute to identify the programme. Required to be used as an identifier for the programme.
Programme Type	Describes the structure/type of the programme (e.g. Undergraduate Certificate, PhD etc.). Required to appropriately group and classify programmes by type.
Anticipated Length	Anticipated duration of programme in years. Required to know length of programme and, for instance, assess compared to actual time to graduation.
Faculty Title & Code	Text field for faculty or school operating the programme, e.g. Faculty of Arts, Faculty of Commerce. Faculty code relates to HEI's own code for faculty. These are required to determine the faculty in which a programme is operated.
NFQ Level	NFQ Award Level, i.e. 1-10. Required to position the programme on the National Framework of Qualifications and classify appropriately for reporting/analysis.
Course Name	A course is a denominated area of study within a programme, for instance, Bachelor of Engineering in Electronic and Electrical Engineering. Required to determine the specific course a student is undertaking.
Course Code	This is the colleges own code for the course. This code must correspond with the course code provided in the survey file. This code also links the course and survey files. Required to identify the specific course a student is undertaking.

Field	Description/Rationale for Collection
Subject Indicator	If subject level data is being provided in the survey file for students/graduates on this course a 'Y' should be inserted in this field. Required to indicate data present within survey file.
CAO Code	The corresponding CAO course code should be inserted here where available. Required to identify the CAO course that the student is undertaking.
Co-ordinating Institutions	Identifies co-ordinating bodies for courses. Required to determine if co-ordinating institutions are involved in operating the course.
Outreach	These are courses run in 'off-campus' sites, which involve some degree of attendance by the student. The institution in question is a core/central partner in the course, and the student is registered at this institution. Required to determine if the course is run on an outreach basis.
Awarding Body	The awarding body for the course. Required to identify the correct awarding body.
Funding Indicator	Identifies specially funded courses. Required to identify courses funded via specific means, e.g. ESF.
Add-on	An add-on course is an undergraduate course accepting students who have received recognition and credit for a previously attained higher education award. Required to determine if a student has received credit/recognition for previous higher education.
Course Completion Credits	Credits required for successful course completion. Required to determine the total credits required in a course to complete.
Full Time Credits	Normal number of full-time credits required for this course per year. Required to determine the number of credits per year (FT basis).
Course Class	Course markers for general/vocational and academic/professional classifications as per DES/EC requirement. Required to fulfil European reporting requirements.
Teacher Training	Teacher Education course marker to help identify teacher training courses. This will be especially useful where teacher training courses are not under the ISCED codes 0110-0114 or where courses under these codes are not clearly identified as primary, secondary or further education. Required to properly identify teacher training courses for reporting and analysis purposes.
Student ID	Student identifier must be retained on a year-on-year basis for the duration of the student's studies at undergraduate level. If the institution retains the number for postgraduate studies, then this number should be supplied. Required as a unique identifier for a student, within an institution.

Field	Description/Rationale for Collection
CAO Number	CAO number (number in current usage). Required to identify the CAO record of the student for associated information (points, grades, 2nd level school).
PPS Number	The PPSN must be supplied for all Irish domiciled students and graduates, with the exception of Northern Irish students. Required as a unique identifier for students within and across institutes, to link to other administrative datasets and to verify the number of students in an institution and their correct records.
Enrol Status	This field identifies whether the record relates to a student or a graduate. Required to determine if the record relates to a student or a graduate.
Course Year	Year of course student is in. Final year is to be submitted for graduates. Required to determine the year of course the student is currently in.
Mode of Study	Mode of study refers to the study load of the student, whether full-time, part-time, distance or e-learning. Required to determine the applicable study mode.
ISCED code	Classification of course by international field of education. The 2013 ISCED codes as adopted by the 37th session of the UNESCO General Conference is in use from the 2014/2015 academic year onwards for all student records submitted to the SRS. Required to determine the field of study the student is studying in.
Subject 1	Subject data should be provided for courses tagged 'Y' under the subject indicator field in the course file. If a second specialism is offered, this should be recorded in Field Subject 2. Similarly, if a third specialism is offered, this should be recorded in Field Subject 3 etc. Required to determine subjects studied.
Subject 2	As above. Required to determine subjects studied.
Subject 3	As above. Required to determine subjects studied.
Subject 4	As above. Required to determine subjects studied.
Non-Standard Award	An award code for graduates whose award obtained is different to the aim of the programme, as defined in the programme type field in the programme file. If populated, this field has primacy over the programme type code in the programme file. Required to determine the award type a graduate receives.
Grade	Classification of award obtained by graduates. Not all award classifications will be relevant to all institutions. Required to determine the final grade awarded.
PhD Structure	A tag for PhD students who are enrolled on or have graduated from a structured PhD course. A structured PhD must include subject specific education and generic transferable skills training with appropriate placements, rotations and assignments alongside the research element of the programme. Required to determine if a PhD is structured or not.

Field	Description/Rationale for Collection
Student Code	Identifiers for distinct student types, e.g. new entrant, repeat, re-enrolled. Required to determine the type of student/graduate enrolment.
Non-Standard Attendance	Tag for Non-Standard Attendance. O1, O2, OY, J1, J2, JY tags should be used for incoming visiting students from abroad and the United States. The 1, 2, Y refers to the length of the stay. Required to identify, for instance, JYA students.
Exchange	Identifiers for: 1.) incoming exchange students, 2.) outgoing exchange students, 3.) graduates that had a period of higher education-related study or training (including work placements) abroad (including Erasmus/other exchange programmes). Required to identify exchange students and type of exchange.
Gender	Gender. Required to identify the gender of students/graduates.
Date of Birth	Date of birth. Required to determine the age of students/graduates and also to verify PPSN data with the Department of Employment Affairs and Social Protection.
First Name	First name of student as per registration record. Required to verify PPSN data with the Department of Employment Affairs and Social Protection.
Surname	Surname/family name of student as per registration record. Required to verify PPSN data with the Department of Employment Affairs and Social Protection.
Domiciliary	The country of permanent address prior to entry to the programme of study. It is not necessarily the correspondence/term address. If the student has been residing in Ireland for 3 of the 5 years before registering for their current course of study their domiciliary of origin should be Ireland. The domiciliary of origin should not change during their period of study. Required to determine the domicile of students/graduates and monitor international student numbers.
Address 1	The full permanent address prior to entry to the programme of study. It is not necessarily the correspondence/term address. Required to assign a deprivation index score based on home location and also to assist in verifying PPSN data with the Department of Employment Affairs and Social Protection.
Address 2	We have provided 5 address fields. The first field is mandatory. The remaining 4 fields are there, where needed, to accommodate longer addresses. Required to assign a deprivation index score based on home location and also to assist in verifying PPSN data with the Department of Employment Affairs and Social Protection.
Address 3	As Above. Required to assign a deprivation index score based on home location and also to assist in verifying PPSN data with the Department of Employment Affairs and Social Protection.

Field	Description/Rationale for Collection
Address 4	As Above. Required to assign a deprivation index score based on home location and also to assist in verifying PPSN data with the Department of Employment Affairs and Social Protection.
Address 5	As Above. Required to assign a deprivation index score based on home location and also to assist in verifying PPSN data with the Department of Employment Affairs and Social Protection.
County	The county of permanent address prior to entry to the programme of study. It is not necessarily the correspondence/term address. The county of origin should not change during the course of their study. This field should only be completed where the domiciliary of origin is Ireland. Required to determine the County Irish students/graduates come from.
Eircode	Eircode is Ireland's postcode system, launched in July 2015. Required to identify the Census small area a student/graduate comes from to assign a deprivation index score and monitor equity of access for disadvantaged cohorts.
Postal Code	The postal code of permanent address prior to entry to the programme of study. It is not necessarily the correspondence/term address. The postal code should not change during the course of their study. This field should only be completed where the domiciliary of origin is Ireland and where Dublin has been assigned under County of Origin. Required to determine the area Dublin students/graduates come from.
Nationality	This field defines legal nationality (as appears on passport). For Northern Ireland students, this may be self-defined. Required to determine the nationality of students/graduates.
Non-EU fee	Tag for students paying the non-EU fee (Economic fee). Where students are paying a non-EU fee (or where a third party is paying this on their behalf) a 'Y' should be inserted in this field. This field should reflect the fee situation of the student as of the 1 March census date. Required to determine the fee status of students/graduates.
Residence	This is accommodation during term time. Required to determine the residence type of students/graduates.
Fees	This question only relates to the free fees initiative as provided by the Department of Education and Skills and not to fees which are paid under another scheme, by another country or third party on behalf of the student. Where a code of 1 is inserted under this field the non-EU fee field should remain blank. This field should reflect the fee situation of the student as of the 1 March census date. Required to determine the fee status of students/graduates.

Field	Description/Rationale for Collection
DES Grant	A tag for full-time students who are in receipt of: 1.) A student grant through the Student Universal Support Ireland (SUSI) (applicable from 2012/2013 academic year), 2.) Some assistance under Department of Education grant schemes (applicable for the 2011/2012 academic year and previous years). Required to determine grant status of students/graduates.
SUSI Code	Where a student is in receipt of funding from SUSI the relevant grant code should be entered in this field as per the file received from SUSI in each HEI. Required to determine grant level of students/graduates.
Post-Primary School	Post-primary school attended, as per CAO field. Required to determine the second level school attended.
Leaving Cert Points	Student's CAO Points score for this course e.g. 340, 470 etc. Required to determine points upon entry.
Leaving Cert Year	Year sat last Leaving Cert or GCE. Required to determine year the Leaving Certificate was sat.
Leaving Cert Exams	Exam performance in last Leaving Cert. Can be derived from CAO fields: subjects & results. Required to determine Leaving Certificate subjects taken and grades achieved.
Last Institution Attended	Last (awarding) institute student attended (required for ROI domiciled students only). Required to identify the last institute attended.
Year Left	Year graduated from last (awarding) institution. Required to determine the year graduated from last institution.
Highest Qualification	Highest qualification student has attained prior to entry to this course. It should be noted that a student's highest qualification on entry is not necessarily that which was required for entry to the programme of study. Required to determine the highest level of qualification already held.
Entry Basis	Basis on which the student was accepted for entry to their course. Where multiple paths of entry are available to a student, eg LC points and a mature years option, it should be the particular route of entry that was actually used to allocate a place that is recorded here. Required to determine the basis of entry to the course.
Accumulated Credits	Number of credits accumulated to the end of previous academic year, e.g. 0 if the student is in 1st year. Required to determine the credits accumulated up to the end of the previous year.

Field	Description/Rationale for Collection
Current Year Credits	Number of credits to be accumulated this academic year, e.g. 60 for an Honours Bachelor Degree. Required to determine the credits to be accumulated this year.
Up-skilling Initiative	This field identifies whether the record relates to a student who has entered through a government initiative to provide up-skilling training and support as identified by the institute admission records. E.g. Springboard, Labour Market Activation and ICT Graduate Skills Conversion Programme. Required to identify if the student is on an up-skilling initiative course.
Fund	This field identifies whether the record relates to a student who has funding through the Fund for Students with a Disability. Required to identify FSD recipients.

FULL LIST OF GRADUATE OUTCOMES SURVEY FIELDS 2019:

PPSN	This is the graduate's PPS number as returned to the Student Record System: *The PPSN must be supplied for all Irish domiciled students and graduates, with the exception of Northern Irish students. Required as a unique identifier for students within and across institutes, to link to other administrative datasets and to verify the number of students in an institution and their correct records.*
Student ID	This is the graduate's student identifier as returned to the Student Record System: *Student identifier must be retained on a year-on-year basis for the duration of the student's studies at undergraduate level. If the institution retains the number for postgraduate studies, then this number should be supplied. Required as a unique identifier for a student, within an institution.*
Date of birth	This is the graduate's date of birth as returned to the Student Record System. Required to determine the age of graduates.
County code	This is the graduate's county code as returned to the Student Record System: *The county of permanent address prior to entry to the programme of study. It is not necessarily the correspondence/term address. The county of origin should not change during the course of their study. This field should only be completed where the domiciliary of origin is Ireland. Required to determine the County Irish graduates come from.*
Domiciliary code	This is the graduate's domiciliary code as returned to the Student Record System: *The country of permanent address prior to entry to the programme of study. It is not necessarily the correspondence/term address. If the student has been residing in Ireland for 3 of the 5 years before registering for their current course of study their domiciliary of origin should be Ireland. The domiciliary of origin should not change during their period of study. Required to determine the domicile of graduates and monitor international graduate numbers.*
Gender	This is the graduate's gender as returned to the Student Record System. Required to identify the gender of graduates.
Mode	This is the graduate's mode of study as returned to the Student Record System: *Mode of study refers to the study load of the student, whether full-time, part-time, distance or e-learning. Required to determine the applicable study mode.*
Grade	This is the graduate's grade as returned to the Student Record System: *Classification of award obtained by graduates. Not all award classifications will be relevant to all institutions. Required to determine the final grade awarded*.
Institute Name	This is the institution's code name as returned to the Student Record System: *This is the identifier for the institute and must correspond to a code on the list supplied by the HEA. Required to identify the institute the data relates to.*
Course Code	This is the graduate's course code as returned to the Student Record System: *This is the institution's own code for the course. This code must correspond with the course code provided in the survey file. This code also links the course and*

	survey files. Required to identify the specific course a student is undertaking.
Course name	This is the graduate's course name as returned to the Student Record System: *A course is a denominated area of study within a programme, for instance, Bachelor of Engineering in Electronic and Electrical Engineering. Required to determine the specific course a graduate has undertaken.*
ISCED information	This is the graduate's ISCED field of study as returned to the Student Record System: *Classification of course by international field of education. The 2013 ISCED codes as adopted by the 37th session of the UNESCO General Conference is in use from the 2014/2015 academic year onwards for all student records submitted to the SRS. Required to determine the field of study the student is studying in.*
NFQ Level	This is the graduate's NFQ level as returned to the Student Record System: *NFQ Award Level, i.e. 1-10. Required to position the programme on the National Framework of Qualifications and classify appropriately for reporting/analysis*
Progtype code	This is the graduate's programme type code as returned to the Student Record System: *Describes the structure/type of the programme (e.g. Undergraduate Certificate, PhD etc.). Required to appropriately group and classify programmes by type.*
Year of graduation	Year the graduate completed studies. Required to determine the year the graduate completed studies.
Return Year	This is the year the graduate was surveyed. Required to determine the which iteration of the survey is under consideration.
Response	This indicates whether the graduate answered the survey or whether their data was obtained using administrative sources. Required to obtain response rates and calculate survey weights.
Principal_Economic_Status_MOST	This indicates the activity that is most important to the graduate. Required to determine the main activity the graduate is involved in after graduation. List of response options given.
Principal_Economic_Status_ALL	This indicates the full range of activities that the graduate is involved in. Required to determine all the activities the graduate is involved in after graduation. List of response options given.
Job_Title	The graduate's job title, if in employment. Required for detailed analysis of graduate occupations. Free text response. Optional to fill out.
Occupation_Broad	The graduate's broad occupation, if in employment. Required to determine the types of occupations that graduates enter. List of response options given.

Organisation	The graduate's employer name, if in employment. Required for detailed analysis of employers of graduates. Free text response. Optional to fill out.
Employment_Where	The overall location (Ireland or overseas) where the graduate works, if in employment. Required to assess the extent to which graduates find employment in Ireland or otherwise. List of response options given.
Employment_Ireland	The county where the graduate works, if in employment in Ireland. Required to assess the regional dimension of graduate employment. List of response options given.
Employment_Overseas	The country where the graduate works, if in employment overseas. Required to assess the international dimension of graduate employment. List of response options given.
Sector_Broad	The graduate's broad sector of employment, if in employment. Required to determine the types of economic sectors that graduates enter. List of response options given.
Employment_Type	The employment status of graduates (employee, self-employed etc.), if in employment. Required to assess the nature of graduate employment status. List of response options given.
Contract	The contract status of graduates (permanent, fixed-term etc.), if in employment. Required to assess the nature of the contracts graduates receive when they gain employment. List of response options given.
Salary	The annual salary of graduates, if in employment. Required to determine the salaries that graduates command. List of response options given.
Placement	Whether the graduate completed a work placement or not during the course of their studies, if in employment. Required to determine whether work experience was a part of the graduate's course experience. List of response options given.
Placement_Time	How long the graduate's work placement lasted, if they did complete one. Required to determine the duration of graduate work experience. List of response options given.

Relevance	The graduate's view of the relevance of their course to their job on a scale of 1-5, if in employment. Required to assess relevance of study to employment outcomes. List of response options given. Optional to fill out.
Qual_Need	The graduate's view of whether they needed their qualification in obtaining their job, if in employment. Required to assess whether the job required the qualification or not. List of response options given. Optional to fill out.
Find_Out_About_Job	How the graduate found out about their job, if in employment. Required to assess nature of successful job search by graduates. List of response options given. Optional to fill out.
Institution_Where	The overall location (Ireland or overseas) where the graduate studies, if in further study. Required to assess the extent to which graduates progress to further study in Ireland or otherwise. List of response options given.
Institution_Ireland	The county where the graduate studies, if in further study in Ireland. Required to assess the regional dimension of graduate further studies. List of response options given.
Institution_Overseas	The country where the graduate studies, if in further study overseas. Required to assess the international dimension of graduate further studies. List of response options given.
Further_Institution	The name of the institution where the graduate is studying, if in further study. Required to give detailed analysis of further study institutions for graduates. Free text response. Optional to fill out.
Further_Course	The name of the course that the graduate is studying, if in further study. Required to give detailed analysis of further study courses for graduates. Free text response. Optional to fill out.
Further_ISCED	Classification of further study course by international field of education, if in further study. The 2013 ISCED codes as adopted by the 37th session of the UNESCO General Conference is in use from the 2014/2015 academic year onwards for all student records submitted to the SRS.

	Required to determine the field of study the graduate is now studying in. List of response options given.
Award_Sought	The programme type code of the course the graduate is studying, if in further study. Required to determine the level of study that the graduate is progressing to. List of response options given.
Further_Mode	The mode of delivery of the course the graduate is studying, if in further study. Required to determine the applicable study mode. List of response options given
Why_Do_Further_Study	The reason why the graduate has continued in further studies, if in further study. Required to assess reasons for engaging in further study. List of response options given. Optional to fill out.
Other_Activity_A	Whether the graduate held a job in the intervening period between graduation and the survey census date, if unemployed. Required to assess if the graduate has been seeking work since graduation. List of response options given.
Other_Activity_B	The activity the graduate is engaged in, if engaged in another activity. Required to assess if the graduate has been seeking work since graduation. List of response options given.
Barriers	The barriers to employment for the graduate, if unemployed or engaged in other activities. Required to assess difficulties graduate have in obtaining employment. Free text response. Optional to fill out.
Same_Course	How likely a graduate is to study the same course again, on a scale of 1-5, for all graduates. Required to give an overall indication of student satisfaction with their course. List of response options given. Optional to fill out.
Follow_Up	If the graduate is willing to be contacted in two years' time, for all graduates. Required to determine if the graduate can be contacted as part of any (yet to be developed) longitudinal survey. List of response options given.