HEA | HIGHER EDUCATION AUTHORITY
AN tÚDARÁS um ARD-OIDEACHAS

Data Privacy Impact Assessment

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

Updated December 2020

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.

This Privacy Impact Assessment is a living document and is updated periodically taking into account the nature, scope, context and purposes of the processing carried out by the HEA where such processing is likely to result in a high risk to the rights and freedoms of natural persons.

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.

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 Higher Education 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.

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 instances of data processing within the HEA given 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

The HEIs return the data fields as set out in Appendix 1. Students are informed of the existence of the SRS and other data collection in the Student Data Collection Notice, which is issued annually.

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

The data is collected by the HEIs on behalf of the HEA and once uploaded by the HEI to the secure portal it is then stored and processed on Oracle servers based in Ireland.

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 (GO)

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 Graduate Outcomes Survey data is linked with SRS data for the purposes of statistical analysis and this can consider SRS variables/data items such as:

- Socio-economic background
- School information / Leaving Certificate points
- Entry basis
- Ethnicity
- Parental status

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. The Equal Access Survey data collected contains identifiable student data as student ID is included. Data are linked back into the SRS and other administrative data.

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. The objective of the EAS is to ask higher education new entrants to answer a set of access related questions as part of the normal registration procedure. Registration in the main occurs in institutions between early September and

late October each new academic year. The questions relate to students facing social and/or financial barriers to higher education.

For the 2018/2019 academic year EAS data was collected in an anonymous basis while consideration was given to how best ensure compliance with Regulation 2016/679. For the 2019/2020 academic year the EAS will no longer be anonymous but will still be voluntary. Considering the constrains of Regulation 2016/679 the decision was made to no longer collect information pertaining to a student's parents or to assign social class codes to parents of data subjects.

2.4.   TRANSFER OF DATA FROM HEI TO HEA

For practical reasons 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.

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.[1]

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 will be 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. No other data is shared with the DEASP.

Department of Education and Skills & Relevant Agencies (SOLAS)

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. The basis for future data sharing may be data sharing agreements and the Data Sharing and Governance Act 2019.

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 shared in a form where the data subject is not identifiable and is shared from the SRS, EAS and GO.

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

3.   LEGAL BASIS FOR COLLECTING AND PROCESSING DATA

The HEA has a statutory responsibility for the effective governance and regulation of the higher education system pursuant to the Higher Education Authority Act 1971 and subsequent amending legislation which has extended its remit to encompass Institutes of Technology and more recently Technological Universities. In order to discharge its functions effectively it must process certain categories of personal information. 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(1)(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 (GO)

The Graduate outcomes survey is a voluntary survey. Article 6(1)(a) or 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;"*. The agreement between the HEA and the HEIs places the responsibility on the HEI to gather such consent. Once the data has been gathered by the HEA on accordance with the above methodologies, it will be further processed for statistical purposes. Please see section 3.4 for more detail.

The Equal Access Survey (EAS)

The EAS is conducted by the individual HEI on a voluntary basis. The data is processed based on explicit consent in accordance with Article 9(2)(a) *where "the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject*;". The agreement between the HEA and the HEIs places the responsibility on the HEI to gather such consent. Once the data has been gathered by the HEA on accordance with the above methodologies, it will be further processed for statistical purposes as required under the National Plan for the Equity of Access to Higher Education. EAS data is used to measure progression, completion and graduate outcomes for disadvantaged cohorts. Identifiable student level data is required to complete these analyses. Please see section 3.4 for more detail.

Section 38 of the Data Protection Act 2018 expands upon Article 6(1)(e) in the context of Irish law. In this respect it provides that processing shall be lawful to the extent that such processing is necessary and proportionate for the performance of a function of a controller conferred by or under an enactment. It is thus the position of the HEA that provides such processing is necessary and proportionate for the statutory functions the processing is lawful in the context of the GDPR. Section 38 of the Data Protection Act 2018 is set out in detail hereunder:

38. (1) The processing of personal data shall be lawful to the extent that such processing is necessary and proportionate for—

(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 which is of particular note in the context of the EAS which by its nature envisages the processing do special category personal data. Section 49 provides that "subject to suitable and specific measures are taken to safeguard the fundamental rights and freedoms of data subjects, the processing of special categories of personal data shall be lawful"

The concept of necessity and proportionality, together with suitable and specific measures as they apply to the HEA are considered later in this assessment

3.1. 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,

3.2. 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 HEIs 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 (mandatory for Irish domiciled students).

3.3. 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.

3.4. 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.

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.[2]

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.

Section 36 of the DPA 2018 lists a number of suitable safeguards which should be considered when processing data for statistical purposes, the HEA has employed a number of these safeguards effectively:

Measure	Brief description
Explicit consent	Non-explicit consent is gathered by the HEIs from the students for the GOS and EAS. The data collection notice provides information to the students regarding the collection, processing and sharing of their data
Limitation on access to the data and processing	Only persons in the statistics team and IT team have access to the identifiable student level data, strict controls are in place. HEIs can only see data which is relevant to them, measures are in place to ensure there is no unauthorised access from HEIs, such as accidental access to another HEIs data.
Specific targeted training	All members of the statistics team have academic degrees in fields relevant to statistics and research. Data Protection awareness training has been carried out, additional training of the statistics team is planned for early 2020
Logging mechanisms for access and alteration	A system for logging access to the data is in place and is monitored by the senior database administrator.
Designation of a DPO	A DPO has been appointed and is in place

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

Encryption of the data	The front end of the system is held on APREX REST server with https 256-bit encryption, Azure Rights Management has also been deployed.
Governance structures in place	A Data Protection Team has established and reporting structures are in place to ensure that Data Protection is taken into account at the highest level of the organisation.
Process for a risk assessment	DPIAs have been carried out and there is a process in place to identify when one might be needed, and how to carry one out.
Process for management and conduct of research	Senior members of the team have attained a PHD, in doing so adhering to high level of research standards. The team is part of the HEA which is responsible in part for setting research standards in higher education institutions in Ireland.

4. NECESSITY AND PROPORTIONALITY OF THE PROCESSING OPERATIONS

Necessity and Proportionality are concepts which inform the application of Article 6(1)(e) together with Sections 38 and 49 of the Data Protection Act 2018. This analysis considers the operation of HEA data processing activities in the context of the EDPS Necessity Toolkit[3] and EDPS Guidelines on assessing the proportionality of measures that limit the fundamental rights to privacy and to the protection of personal data.[4]

4.1. NECESSITY

Necessity is the need for a fact based assessment of the effectiveness of a certain measure for the objective pursued and whether it is less intrusive compared to other options for achieving the stated goal.[5] It is now broadly accepted in assessing the application of limitations to rights prescribed by the GDPR that the necessity of a measure should first be considered before assessing proportionality.[6] As such this DPIA will consider the necessity of the processing carried out by the HEA in the context of statistical analysis and funding, both of which are informed by the operation of the SRS, GO and EAS databases.

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[3] https://edps.europa.eu/data-protection/our-work/publications/papers/necessity-toolkit_en

[4] EDPS Guidelines on assessing the proportionality of measures that limit the fundamental rights to privacy and to the protection of personal data

[5] In the guidance issued to the EU institutions to assess whether video-surveillance measures are necessary in accordance with Regulation 45/2001, the EDPS highlighted that "systems should not be installed if they are not effective in achieving their purposes, for example, if they merely provide the illusion of greater security" (section 5.4)

[6] joined cases C-293/12 and C-594/12, Digital Rights Ireland, http://curia.europa.eu/juris/documents.jsf?num=c-293/12

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 student's 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.

SRS Data

In order for the HEA to fulfil its statutory functions, individual student level data has to available for analysis within the HEA. In order to link datasets, a unique identifier must be collected (PPSN) and in order to validate PPSN data, name and address must be collected. Address is required to assign a deprivation index score to each student based on home location. The SRS data is used on a daily basis to answer queries internally in the HEA and externally from the Department of Education and Skills, other Government bodies, Higher Education Institutions, researchers, academics, journalists and members of the public. SRS data is also a fundamental input to the funding model in the HEA, so public funding is directly linked to this data.

EAS Data

Equal Access Survey data is a key source of data used to measure participation of disadvantaged groups and their outcomes in higher education. It is critical to measure the effectiveness of policy measures adopted by the Department of Education and Skills and the HEA contained in the National Plan for Equity of Access to Higher Education 2015 — 2019. Student level identifiable data is required to meet this requirement.

GO Data

Regarding the graduate outcomes survey, higher education institutions carry out the survey on the HEA's behalf by contacting graduates during April—June of each year. The data, as compiled by the HEA, is used to provide a picture of graduate employability and further study. Year on year, this provides trend information on labour market outcomes for graduates. The HEA publishes an annual report on graduates, summarising the national picture. Furthermore, a summary of the first destination of graduates is detailed by institution in the Institutional and Sectoral Profiles. The data is also used at institutional level. For example, the results are used to inform programmatic and quality reviews, for marketing and alumni outreach, and as a key management information tool in the universities.

There is growing recognition, both nationally and internationally, of the importance of measuring the quality and output of higher education. The European Commission aims to improve the availability of qualitative and quantitative information about what graduates from third level education do after they complete their education and training and states, "Such information can be used by services that help new students make informed choices about what to study, by teaching staff and institutional

management as input for the design of courses and by government authorities to inform decisions about how to steer higher education... systems."[7]

As documented in the HEA's (2015} review of international practice, graduate surveys are increasingly becoming one of the main instruments used to measure higher education output. This is because they provide concrete information that is useful for a wide variety of stakeholders, including policy makers, higher education institutions and prospective students. Furthermore, the results of graduate surveys can be used for benchmarking institutional performance over time and against other similar institutions.

Linking of the Graduate Outcomes Survey and Student Records System data enhances the quality of the statistical analysis the HEA can carry out, by comparing employability outcomes for different types of graduates within these groups. Ultimately this enables policy makers and higher education institutions to improve the employability of graduates, support quality assurance systems, monitor the effectiveness of programmes, and ensure social inclusion.

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, and there is no alternative means by which the HEA can achieve its aims.

Practical examples of the how Data is used by the HEA

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[7] *Proposal for a Council recommendation on tracking graduates* http://opac.oireachtas.ie/AWData/Library3/DESdoclaid290617_132240.pdf

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 close to 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.

For more granular information on the necessity of the processing please see Appendix 2.

4.2.   PROPORTIONALITY

Having considered the necessity of the information collected it thereafter follows the proportionality of the data collection regime needs to be considered.

The concept of proportionality is a well established concept in EU law. The general principle is that the content and form of an action should not exceed what is necessary to achieve an objective. The advantages of a measure should not outweigh the disadvantages. In practical terms the proportionality test will involve assessing what safeguards should accompany a measure to reduce the risks to the individual.
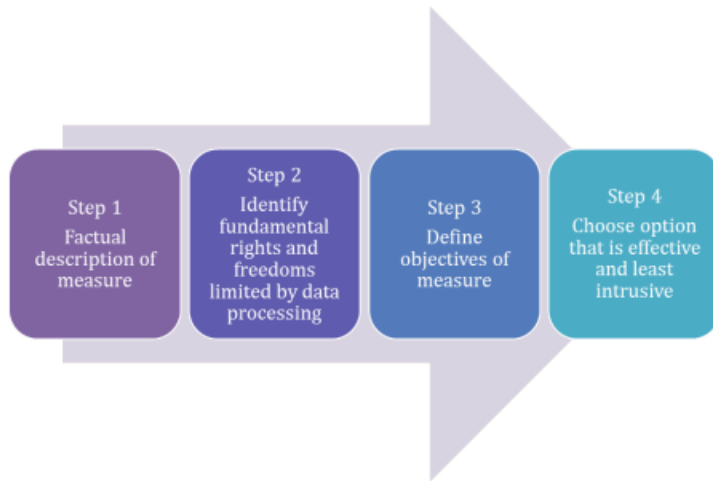
Figure 1

Figure 1 above sets out the methodology advised by the EDPS in assessing the necessity a proposed legislative measure. The HEA has adopted an analogous approach in considering the necessity an application of the SRS, GO and EAS databases. Figure 2 considers the proportionality test to be applied thereafter.
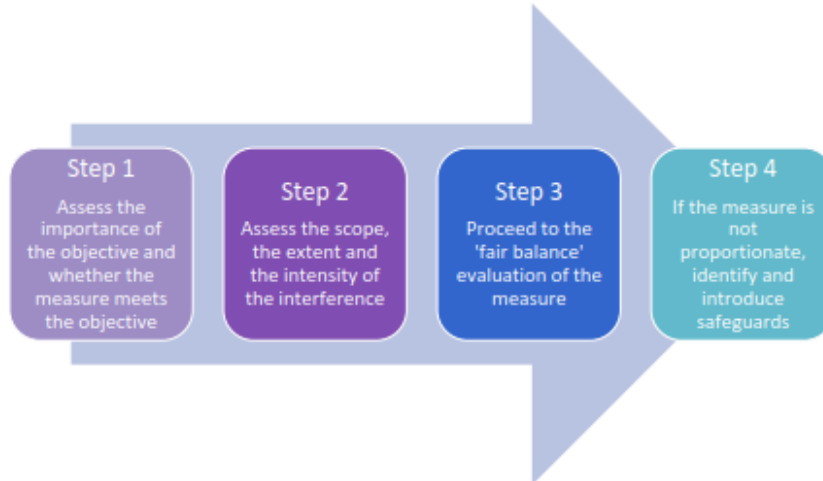
Figure 2

The individual databases are considered in their contexts in figure 3 below in the context of the EDPS guidelines:

	SRS	GO	EAS
Step 1	• Direct HEI funding in a appropriate manner, and to inform the HEA formulate effective HE policy	• Helps new students make informed choices about what to study, benchmark institutional performance	• Measure the effectiveness of policy for disadvantaged groups in society

Step 2	• Not voluntary. • Data is only shared in limited circumstances.	• Is voluntary • Data is only shared in limited circumstances. Is not used to profile or score individuals.	• Is voluntary • Data is only shared in limited circumstances. Is not used to profile or score individuals.
	• Not special category data	• Not special category data	• Is special category data
Step 3	• Students obligated to partake.	• Is balanced as no obligation on data subject to partake. No adverse consequences for not partaking.	• Is balanced as no obligation on data subject to partake. No adverse consequences for not partaking.
Step 4	If no compulsion, then SRS data would be incomplete and statutory objectives of the HEA would not be met due to insufficient data in respect of HE cohort.	No obvious risks over and above any public body data set.	While a sensitive data set, risks are ameliorated by taking appropriate measures. Voluntary nature of collection reduces risk.
	Deemed proportionate.	Deemed proportionate.	Deemed proportionate.

Figure 3

It is viewed by the HEA that the information collected and any potential adverse consequences to individuals rights is proportionate to the benefits of the funding models, statistical and policy analysis or other processing that is carried out.

The purpose and rationale 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.

5. RISKS IDENTIFIED & RECOMMENDATIONS

Describe the source of risk and nature of potential impact on individuals.

Risk No. Risk	1. Lawful, Fair & Transparent: Personal data is processed lawfully, fairly and in a transparent manner.	Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk
1.1	Lawful basis has not been properly identified and documented. The legislation being relied upon is out of date	Reasonable	Some	Medium	Identify and document the lawful basis for processing for the SRS, GOS, and EAS	Low
1.2	The data subjects may not expect their data to be processed in such a manner.	Reasonable	minimal	Low	Ensure that the data collection notice is provided to the data subjects and that that it contains sufficient information. HEIs responsibility	Low
1.3	Data subjects may feel under duress to provide the data due to the fact that it is being sought by their education provider on behalf of a public authority	Reasonable	Minimal	Low	Ensure that the data subjects are fully aware that the surveys are optional and that not taking it will have no adverse effects on them. The HEIs are responsible for ensuring that students are aware that the surveys are optional	Low
Risk No. Risk	2. Purpose limitation: Personal data is only collected for pre-specified, explicit and legitimate purposes and not for further processed if this is incompatible with those purposes.	Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk

Risk No.	Risk	Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk
2.1	There is a risk that the HEA may use the data for other purpose which will cause issues for transparency, lawful basis, integrity and ability to provide for the rights of the data subjects	Remote	Some	Low	Ensure adequate training has been provided and procedures are in place for when the data may be needed for another purpose	low
2.2	Risk that due the purposes in the HEA 1971 Act are not explicit and are open to some interpretation as to the tasks of the HEA	Reasonable	Minimal	Low	New legislation being drafted at present which will ensure that the tasks of the HEA are more explicit.	Low
2.3	There is a risk in linking of data sets (SRS and Graduate Outcomes Survey) that the HEA may use the data for other purpose which will cause issues for transparency, lawful basis, integrity and ability to provide for the rights of the data subjects	Reasonable	Minimal	Low	Ensure adequate training has been provided and procedures are in place for when the data may be needed for another purpose	Low
Risk No.	**3. Data minimisation:** Personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.	**Likelihood**	**Severity**	**Risk Level**	**Mitigating Action**	**Residual Risk**
3.1	Risk that due to the vague nature of the tasks of the HEA, too much data is being processed. The amount of data being processed on each student is high.	Reasonable	Some	Medium	Carry out an assessment on the data fields to discover which are necessary to allow the HEA to carry out its functions	Low
Risk No.	**4. Accuracy:** Personal data shall be accurate and, where necessary, kept up to date.	**Likelihood**	**Severity**	**Risk Level**	**Mitigating Action**	**Residual Risk**

Risk No.		Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk
4.1	Risk that the data being provided by the HEIs and the data subject is not accurate	Reasonable	Some	Medium	Audit and carry out verification checks on the data being provided	Low
Risk No.	**5. Storage Limitation:** Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.	**Likelihood**	**Severity**	**Risk Level**	**Mitigating Action**	**Residual Risk**
5.1	Risk that the retention periods are not properly defined and that S.42 of the DPA 2018 cannot be relied upon	Reasonable	Minimal	Low	Ensure that safeguards are in place, taking into account those mentioned in S.36 DPA 2018	Low
Risk No.	**6. Security, Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security of the personal data.	**Likelihood**	**Severity**	**Risk Level**	**Mitigating Action**	**Residual Risk**
6.1	Risk that appropriate Technical and Organisational Measures (TOMs) not in place which would allow unauthorised access to and/or disclosure of the data	Remote	Serious	Medium	Ensure technical and organisational procedures are in place to stop unauthorised access.	Low
6.2	Due to the large volume of personal and non-personal data being processed, there is a risk of severe damage to the data subjects if the HEA lost control of the data	Remote	Serious	Medium	Ensure there is a high level of security and of awareness. Ensure that there is a data breach process in place to mitigate against further damage in the event of a breach	Low

Risk No.	7. Accountability: It should be demonstrable that personal data is processed in line with data protection principles.	Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk
7.1	Risk that this DPIA is not updated if the categories of personal data are changed or altered in the future	Reasonable	Minimal	Low	Provide adequate training to members of staff and implement DPIA policy	Low
Risk No.	8. Rights of Individuals: Data subjects have the right to request for access, rectification, portability, or erasure of their personal data or to object to the processing method.	Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk
8.1	The right to object to the processing that is based on consent may be challenging to enforce as the data may be aggregated.	Remote	High	Medium	Establish process for consent management	Low
8.2	The right to be forgotten when the processing is based on consent may be challenging as the data is aggregated	Remote	High	Medium	Establish a process to deal with the right to be forgotten	Low
Risk No.	9. Transfers to Third Countries: Personal data shall only be passed on to a country outside the European Economic Area (EEA) if that country ensures an adequate level of privacy protection.	Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk

Risk No.	10. Other risks.	Likelihood	Severity	Risk Level	Mitigating Action	Residual Risk
9.1	N/A					
10.1	N/A					

6. RISK MITIGATION

Risk No.	Mitigation Action	Status Update
1.1	Document the lawful basis for processing and the reasoning behind it.	Lawful basis has been identified and documented.
1.2	Ensure that the data collection notice is provided to the data subjects and that that it contains sufficient information. HEIs responsibility	Audit are carried out to assess how HEIs manage this
1.3	Ensure that the data subjects are fully aware that the surveys are optional and that not taking it will have no adverse effects on them. Part of this is the responsibility of the HEIs	Audit are carried out to assess how HEIs manage this
2.1	Ensure adequate training has been provided and procedures are in place for when the data may be needed for another purpose	All members of the statistics team have academic degrees in fields relevant to statistics and research. Data Protection awareness training has been carried out, additional training of the statistics team is planned for early 2020
2.2	New legislation being drafted	In progress at present and submissions have been made by the HEA
3.1	Carry out an assessment on the data fields to discover which are truly necessary. This is to be done for data retention also.	Complete, please see Appendix 2
4.1	Audit and carry out verification checks on the data being provided	Carried out as standard by the HEA Stats team

5.1	Ensure that documented safeguards are in place, taking into account those mentioned in S.36 DPA 2018	In place as per Section 3.4 above
6.1	Ensure technical and organisational procedures are in place to stop unauthorised access.	A small number of persons have access to the data base, access is controller and there is an access log in place.
6.2	Ensure there is a high level of security and of awareness. Ensure that there is a data breach process in place to mitigate against further damage in the event of a breach	Data protection awareness training has been carried out. Additional training will be provided to members of the data protection team and the statistics team. Cyber security training will be carried out in 2020
7.1	Provide adequate training to members of staff and implement DPIA policy	Data protection awareness training has been carried out. Additional training to be delivered to the Data Protection Team, which includes members of the statistics team. Statistics team are aware of DPIAs and when they are necessary.
8.1	Establish process for consent management	Procedures in place
8.2	Establish a process to deal with the right to be forgotten	Procedures in place

APPENDIX 1

Full List of SRS Fields 2019/20:

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 coordinating bodies for courses. Required to determine if coordinating 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 <u>last</u> Leaving Cert or GCE. Required to determine year the Leaving Certificate was sat.
Leaving Cert Exams	Exam performance in <u>last</u> 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, e.g. 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 Equal Access Survey Fields 2019/20 (including return & academic year, student ID, course code and institute code to match SRS fields):

Field	Description and rationale for collection
Blind or Deaf	Blindness, deafness or a severe vision or hearing impairment. Required to determine disability status of student.
Physical Disability	A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting or carrying. Required to determine disability status of student.
Learning Disability	A specific learning difficulty (e.g. dyslexia). Required to determine disability status of student.
Psychological, Emotional, or Mental Health	A psychological or emotional condition (includes a mental health difficulty). Required to determine disability status of student.
Other Condition	Other, including any chronic illness. Required to determine disability status of student.
Support requirement	Do you require additional educational support(s)? Required to determine disability status of student.
Parental Status	Are you a parent, yes or no. Required to identify parents.
One Parent Allowance	If you are a parent (above), are you in receipt of a one parent allowance? Required to identify those parenting alone.
Ethnic Culture	Ethnic & cultural background. Required to identify ethnicity of a student.

Field	Description and rationale for collection
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.

APPENDIX 2

Necessity Analysis

Student Record System					
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome? If yes, provide details**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
Student ID	To uniquely identify students within institute and for instance, to track students across years. Allows the HEA to make evidence-based decisions in carrying out its tasks under S.3 of the HEA Act.	Student ID to Student ID table join (linking student data across multiple datasets). A unique identifier is required to do these table joins.	No, PPSN coverage is far from complete and is not correct for some students. International students don't have a PPSN generally.	Yes, information provided in the data collection notice which the HEIs are required to make available to the data subjects.	N/A
CAO Number	Required to identify the CAO record of the student for associated information (points, grades, 2nd level school).	A CAO number is unique to that CAO applicant and their associated information is linked to that number. Shows CAO based admission.	No, CAO number is unique to CAO records. This allows us to verify associated CAO data and that entry basis is CAO / LC points.	Yes	N/A
PPS Number	To uniquely identify students and to link HEA data into other Government administrative data; also to allow for SUSI data checks (a statutory requirement). Ensures an accurate representation of student numbers and limits any duplication. Exact data re student numbers needed to assist in the co-ordination of investment based on the total number of students under S.3(b)	PPSN to PPSN table join. A unique identifier is required to do these table joins, where student ID is not relevant. DEASP require name, address, date of birth and PPSN for PPSN verification.	No, fundamental to our work with CSO data – longitudinal analysis.	Yes	N/A

Student Record System					
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome? If yes, provide details**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
Gender	Required to analyse data by gender for equity of access, participation and outcomes. Required for S.3(d).	By identifying gender category.	No	Yes	N/A
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. DOB also allows the HEA to make evidence-based decisions for S.3.	By determining age of students. DEASP require name, address, date of birth and PPSN for PPSN verification.	No	Yes	N/A
First Name	Required to verify PPSN data with the Department of Employment Affairs and Social Protection. Verification of PPSN is required to ensure exact student numbers as detailed above in "PPS Number".	By cross referencing names and associated data with DEASP data. DEASP require name, address, date of birth and PPSN for PPSN verification.	No	Yes	N/A
Surname	Required to verify PPSN data with the Department of Employment Affairs and Social Protection. Verification of PPSN is required to ensure exact student numbers as detailed above in "PPS Number".	By cross referencing names and associated data with DEASP data. DEASP require name, address, date of birth and PPSN for PPSN verification.	No	Yes	N/A
Domiciliary	Required to determine the domicile of students/graduates and monitor international student numbers by domicile and to track international students, including into the labour market. Used to allow the HEA to make evidence-based decisions for S.3(d).	By providing Country of domicile.	No	Yes	N/A
Address	Required to geocode students/graduates into a Census small area and Electoral Division to measure relative affluence/deprivation for socio-economic	DEASP require name, address, date of birth and PPSN for PPSN verification. Exact coordinates facilitate distance to college analysis; small area and ED codes are used for	No	Yes	N/A

Student Record System					
Field	Purpose	How does this achieve the purpose?	Is there another way to achieve the same outcome? If yes, provide details	Is it reasonable for the student to expect that data is processed?	If Art. 9, what safeguards are in place?
	analysis; coordinates required to measure distance to college; also required to verify PPSN with DEASP. Verification of PPSN is required to ensure exact student numbers as detailed above in "PPS Number".	equity of access and outcomes analysis (socio-economic analysis directly linked to HEA's statutory functions, S.3(d) 1971 Act.			
County	Required to conduct County level geographic analysis, including County composition of student cohorts and to separate ROI and NI enrolments (not always accurate when done by domicile). Allows the HEA to analyse the demand and need for HE across counties for a reasonable balance in the distribution of places pursuant to S.6(2).	By identifying the County a student is from.	No	Yes	N/A
Eircode	Required to geocode students/graduates into a Census small area and Electoral Division to measure relative affluence/deprivation or socio-economic analysis; coordinates required to measure distance to college; more accurate than text address but coverage poor at present in returns (not mandatory). Will be used to provide funding based on deprivation score. Deprivation index is required for the HEA to carry out S.3(d) of the 1971 Act. Also used to allow the HEA to give more accurate assistance in the co-ordination of state investment pursuant to s.3(b).	Exact coordinates facilitate distance to college analysis; small area and ED codes are used for equity of access and outcomes analysis (socio-economic analysis directly linked to HEA's statutory functions). More accurate than text address.	No	Yes	N/A
Postal Code	Required to conduct Dublin level geographic and socio-economic analysis for equity of access and outcomes work. Allows the HEA	Identifies Dublin postal code for Dublin enrolments. Analysis can then be conducted by D1, D2, D3 etc.	No	Yes	N/A

Student Record System					
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome? If yes, provide details**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
	to analyse the demand and need for HE across Dublin regions for a reasonable balance in the distribution of places pursuant to S.6(2).				
Nationality	Required to determine the nationality of students/graduates and monitor international student numbers by nationality and to track international students, including into the labour market. Used to allow the HEA to make evidence-based decisions for S.3(d).	By providing Country of nationality.	No	Yes	N/A
DES Grant	Required to determine the type of financial assistance a student is in receipt of, if any – both for programme monitoring purposes and for policy analysis purposes.	Identifies the type of financial assistance a student is in receipt of, if any. Allows for progression, completion and graduate outcomes analysis for those in receipt of financial aid.	No	Yes	N/A
SUSI Code	Required to determine the level of SUSI grant a student is in receipt of – linked directly to statutory functions of the HEA (equity of access related).	By identifying the level of grant, we can for instance monitor the progression, completion and outcomes for those in receipt of the special rate of maintenance grant – the highest rate.	No	Yes	N/A
Last Institution Attended	Required to determine the recent academic history of students which allows the HEA to determine uptake of higher education.	By identifying where the student last studied, if at all. Allows for transitions analysis and cross-referencing of student data.	No	Yes	N/A
Year Left	Required to determine the recent academic history of students and analyse trends for future needs of higher education, required for s.3, s.6, and s.10.	By identifying where and when the student last studied, if at all. Allows for transitions analysis and cross-referencing of student data.	No	Yes	N/A
Highest Qualification	Required to determine the recent academic history of students and analyse trends for	By identifying where, when and at what level the student last studied, if at all. Allows for	No	Yes	N/A

		Student Record System			
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome? If yes, provide details**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
	future needs of higher education, required for s.3, s.6, and s.10.	transitions analysis and cross-referencing of student data.			
Fund	Required to identify students in receipt of FSD funding – linked to national access plan and HEA statutory functions.	By identifying FSD recipients, we can for instance monitor the progression, completion and outcomes for those in receipt of the special rate of maintenance grant – the highest rate.	No – needs to be linked to other SRS data.	Yes	N/A
Post-primary education information	Required to analyse LC points, LC grades and school attended – key determinants of success and key performance indicators. and analyse trends for future needs of higher education, required for s.3, s.6, and s.10.	By allowing for analysis by LC points, LC grades and school attended – key controls in analysis of student success (progression, completion, outcomes).	No – direct CAO data not available.	Yes	N/A
Higher education information	Required to analyse data by HEI, field of student, programme type etc., which allows the HEA inform funding decisions and analyse trends for future needs of higher education, required for s.3, s.6, and s.10.	By providing key data on higher education record, including institution, field of study, programme type, grades etc.	No	Yes	N/A

Equal Access Survey					
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome?**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
Blind or Deaf	Required under the national access plan and/or equity of access analysis – to determine disability status of students. Allows the HEA to analyse the success of efforts made under s.3(d), and analyse future needs of HE to accommodate persons with disability, s.6 and s.10 complimented by the functions of the HEA under S.3(b).	By providing data on disability status of students, all analysis can be carried out on disabled cohorts to determine success in higher education compared to wider population.	No	Yes	• Student Records System (including Equal Access Survey data) and Graduates Outcomes front ends have been upgraded to an APREX REST server with https 256-bit encryption. Access to these front-ends are password protected and ring-fenced data access only to the institute that submitted that data. 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 reference are in the local LAN. This separation of data from the internet improves security. Access to both front ends are controlled by the Sonicwall firewall. Firewall has in-built protection from SQL injection attacks. • Access to the data BI Tool is restricted to specified HEA employees and controlled by passwords. • Back-end access to database is limited to the Senior Database Manager and the IT Manager - password protected. • Backups of the data are carried out daily and stored off-site. • Physical access to servers is limited to IT staff.

Equal Access Survey					
Field	Purpose	How does this achieve the purpose?	Is there another way to achieve the same outcome?	Is it reasonable for the student to expect that data is processed?	If Art. 9, what safeguards are in place?
					• Data that is retrieved and put into email/Word/Excel can be encrypted using the Azure Rights Management tool.
Physical Disability	Required under the national access plan and/or equity of access analysis – to determine disability status of students. Allows the HEA to analyse the success of efforts made under s.3(d), and analyse future needs of HE to accommodate persons with disability, s.6 and s.10 complimented by the functions of the HEA under S.3(b).	By providing data on disability status of students, all analysis can be carried out on disabled cohorts to determine success in higher education compared to wider population.	No	Yes	As above
Learning Disability	Required under the national access plan and/or equity of access analysis – to determine disability status of students. Allows the HEA to analyse the success of efforts made under s.3(d), and analyse future needs of HE to accommodate persons with disability, s.6 and s.10 complimented by the functions of the HEA under S.3(b).	By providing data on disability status of students, all analysis can be carried out on disabled cohorts to determine success in higher education compared to wider population.	No	Yes	As above
Psychological, Emotional, or Mental Health	Required under the national access plan and/or equity of access analysis – to determine disability status of students. Allows the HEA to analyse the success of efforts made under	By providing data on disability status of students, all analysis can be carried out on disabled cohorts to	No	Yes	As above

				Equal Access Survey	
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome?**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
	s.3(d), and analyse future needs of HE to accommodate persons with disability, s.6 and s.10 complimented by the functions of the HEA under S.3(b).	determine success in higher education compared to wider population.			
Other Condition	Required under the national access plan and/or equity of access analysis – to determine disability status of students. Allows the HEA to analyse the success of efforts made under s.3(d), and analyse future needs of HE to accommodate persons with disability, s.6 and s.10 complimented by the functions of the HEA under S.3(b).	By providing data on disability status of students, all analysis can be carried out on disabled cohorts to determine success in higher education compared to wider population.	No	Yes	As above
Support requirement	Required to determine if supports are required for disabled students. Allows the HEA to analyse the success of efforts made under s.3(d), and analyse future needs of HE to accommodate persons with disability, s.6 and s.10 complimented by the functions of the HEA under S.3(b).	By identifying if supports are required for disabled students, allows for system wide monitoring of numbers of students potentially requiring supports.	No	Yes	As above
Parental Status	Required to analyse data on lone parents and ensure financial and non-financial supports are in place for current and future needs. Allows HEA to analyse the success of cohort	By identifying lone parents, all analysis can be carried out on this cohort to determine success in	No	Yes	As above

Equal Access Survey					
Field	Purpose	How does this achieve the purpose?	Is there another way to achieve the same outcome?	Is it reasonable for the student to expect that data is processed?	If Art. 9, what safeguards are in place?
	with specific familial backgrounds, ensuring continued access to HE, s.3(d).	higher education compared to wider population.			
One Parent Allowance	Required to analyse data on lone parents and ensure financial and non-financial supports are in place for current and future needs. Allows HEA to analyse the success of cohort with specific familial backgrounds, ensuring continued access to HE, s.3(d).	By identifying lone parents, all analysis can be carried out on this cohort to determine success in higher education compared to wider population.	No	Yes	As above
Ethnic Culture	Required to identify ethnic background of students – linked to national access plan, equity of access. Allows the HEA to analyse the success of efforts made under s.3(d), and analyse future needs of HE to accommodate minorities.	By identifying ethnic background of students, all analysis can be carried out on different cohorts to determine success in higher education compared to wider population.	No	Yes	As above

Graduate Outcome Survey					
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome?**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
PPSN	To uniquely identify graduates within and across institutions, to link the HEA's Graduate Outcomes Survey data to the Student Record System and to link to other administrative datasets (e.g. CSO).	PPSN to PPSN table join. A unique identifier is required to do these table joins, where student ID is not relevant.	No – this is fundamental to our work with CSO data – longitudinal analysis.	Yes	N/A
Student ID	To uniquely identify students/graduates within an institution and for example, to track students/graduates across years. Allows the HEA to monitor the success of students based on a number of factors. Ensures the HEA can carry out its functions in general.	Student ID to Student ID table join. A unique identifier is required to do these table joins.	No, PPSN coverage is far from complete and is not correct for some students/graduates. International students/graduates do not have a PPSN generally.	Yes	N/A
Date of birth	Required to determine the age of graduates.	By determining the age of graduates.	No	Yes	N/A
County code	Required to determine the county that Irish graduates come from. To analyse the success rates of students from the different counties. Ensures the HEA can	By identifying the county that Irish graduates come from.	No	Yes	N/A

Graduate Outcome Survey					
Field	**Purpose**	**How does this achieve the purpose?**	**Is there another way to achieve the same outcome?**	**Is it reasonable for the student to expect that data is processed?**	**If Art. 9, what safeguards are in place?**
	carry out its task under s.6 and s.10.				
Domiciliary code	Required to determine the domicile of graduates and monitor international graduate numbers by domicile and to track international graduates, including into the labour market.	By providing country of domicile.	No	Yes	N/A
Gender	Required to identify the gender of graduates and analyse equity of outcomes. Allows the HEA to monitor for S.3(d).	By identifying gender category.	No	Yes	N/A
Higher level education information	Required to analyse data by HEI, field of study, programme type, etc. Allows the HEA to analyse success of courses and provide other statistical data which is used to carry out its functions.	By providing data on higher education record, including institution, field of study, programme type, grades, etc.	No	Yes	N/A
Economic status information	The question on 'Principal Economic Status' is required to ascertain whether a graduate is in full- or part time employment,	By providing survey data on the principal economic status of graduates.	No	Yes	N/A

Graduate Outcome Survey					
Field	Purpose	How does this achieve the purpose?	Is there another way to achieve the same outcome?	Is it reasonable for the student to expect that data is processed?	If Art. 9, what safeguards are in place?
	full- or part-time study/training, unemployed and looking for work or engaged in another activity. Allows the HEA to analyse success of courses and provide other statistical data which is used to carry out its functions.				
Employment information	Required to allow for a detailed analysis of graduate employment. For example, to ascertain a graduate's job title, occupation, location and sector of work as well as details regarding contract type, salary, work placement, relevance of their course and qualification to their job and how they found out about their job. Allows the HEA to analyse success of courses and provide other statistical data which is used to carry out its functions.	By providing survey data on graduate employment (e.g. job title, occupation, location and sector of work, contract type, salary, work placement, relevance and how they found out about their job).	No	Yes	N/A