



Privacy notice: GRADE (Grading and Admissions Data for England)

The GRADE (Grading and Admissions Data for England) data sharing project is a joint initiative by the Office of Qualifications and Examinations Regulation (Ofqual), the Department for Education and the Universities and Colleges Admissions Service (UCAS).

Our main objective is to provide accredited external researchers, and analysts within our Organisations (Ofqual, the Department for Education and UCAS), with access to data concerning examinations and admissions to conduct research and independent evaluation. Analysis of this dataset has also the potential to provide valuable insight into the assessment of regulated qualifications and to be used as evidence to guide arrangements for awarding qualifications and university admissions policy and practice in England.

The data will be shared with accredited researchers through the Office of National Statistics Secure Research Service. Controls have been put in place to protect the confidentiality and security of your data.

Aims of the project

The aims of the project are to:

- provide accredited researchers with access to data through the Office of National Statistics Secure Research Service to allow them to perform insightful, evaluative independent research
- use data from the awarding of GCSEs and A levels in the period 2017 to 2022 to inform future education policy – particularly around the fairness of methods for measuring students' attainment, and implications for schools' and colleges' admissions processes
- allow us to learn lessons from the awarding of grades for GCSEs and A levels during the pandemic

The data will also be available to Ofqual, the Department for Education and UCAS to undertake research which could inform decisions about future arrangements for awarding qualifications.

Safeguarding your data

Each of the organisations (Ofqual, the Department for Education and UCAS) holds different information relating to assessment, attainment and admissions for students in England. The GRADE data sharing project will link these separate datasets together to make the data more useful for research.

We understand the need for there to be safeguards to protect the personal information of students, so we will de-identify your information by removing data such as names and dates of birth from the linked data and pseudonymising data¹ before making it available to accredited researchers. The data will be securely shared using the Office of National Statistics Secure Research Service which will apply further safeguards before information is shared with accredited researchers.

Your information and privacy

We want you to know how we (Ofqual, the Department for Education and UCAS) use your personal data as part of this project, why we need it, and what your rights are.

If you need extra help, would like this notice in an alternative, accessible format, or if you have any questions about this privacy notice or the information we hold about you, please contact one of the Data Protection Officers at Ofqual, the Department for Education or UCAS using the contact details below:

Data protection office, Ofqual

Data Protection Officer, Ofqual, 2nd floor, 1 Friargate, Station Square,
Coventry CV1 2GN
Email: dp.requests@ofqual.gov.uk

Data protection office, Department for Education

Data protection, Department for Education, 7&8 Wellington Place,
Wellington Street, Leeds, LS1 4AW
Email: dataprotection.office@education.gov.uk

¹ With pseudonymised data we mean personal data which has been processed in such a manner that the personal data can no longer be attributed to you without the use of additional information (a 'key').

Data protection office, UCAS

Data Protection Officer, UCAS, Rosehill, Cheltenham, Gloucestershire, GL52 3LZ

Email: datagovernance@ucas.ac.uk

Who is responsible for looking after your information

Each of the 3 organisations (Ofqual, the Department for Education and UCAS) are either joint or independent data controllers of the personal data being processed as part of this project.

We are joint controllers when we:

- share the data each of us has that is relevant to this project
- decide how the Office for National Statistics will look after and process your data on our behalf
- grant access to data to accredited researchers to enable them to conduct independent research

We will be independent controllers if one of our Organisations uses the data we have shared between us in this project, for:

- purposes related to this project
- compatible purposes that help us perform and improve our functions, if that is in the public interest

Each organisation has its own privacy notice explaining how it uses personal data. Below you will find links which provide further information on this.

In any case, we are responsible for what we do with your personal data. Before we share any of your information with others, we ensure that they will treat your data according to the law and only on a need-to-know basis for the aims of this project.

Information being shared

It's our job to tell you how we will collect and use your information as part of this project. If you fall into one of the 3 categories below, it is likely that we will be sharing some of your information as part of this project.

Ofqual data being shared

Students who completed at least one GCSE or A level course in England in the summer sessions for 2017, 2018, 2019, 2020, 2021 or 2022.

Department for Education data being shared

Students who were in Key Stage 4 or Key Stage 5 of education for all state schools, non-maintained special schools, sixth form colleges, further education colleges and independent schools in England in the academic years 2016 to 2017, 2017 to 2018, 2018 to 2019, 2019 to 2020, 2020 to 2021, and 2021 to 2022.

UCAS data being shared

Students from England who applied to university through the UCAS main scheme at the age of 18 for the 2017, 2018, 2019, 2020, 2021, and 2022 application cycles.

Personal data being shared

This is the list of personal data we will use and share. It includes characteristics as collected from the school census as well as information processed for awarding and for admissions processes:

- unique candidate identifier [linking only – not shared]
- first name, middle name and surname [linking only – not shared]
- date of birth [linking only – not shared]
- gender
- data concerning your health, specifically whether you have a special educational needs status
- racial or ethnic origin
- free school meal eligibility and other socio-economic indicators
- your age on 31 August at the end of the academic year relating to the exam
- whether you were a private candidate
- number of GCSEs taken
- grade awarded
- centre assessment grade (CAG) and the rank with your exam centre and subject group (for 2020 only)
- grade awarded after the outcome of any type of grading appeal
- marks for any exams you sat (excluding for 2020)

Data marked with [linking only – not shared] is used to link together the data from Ofqual, Department for Education and UCAS so that we can create the dataset that can be used for research. The information marked with [linking only – not shared]

Privacy notice: GRADE (Grading and Admissions Data for England) will not, however, be accessible to accredited researchers. Find out more information about how each organisation processes your data outside of this project in the section 'privacy and data protection notices'.

Special category personal data

The categories of information that we will process include personal data revealing your racial or ethnic origin and data concerning your health, specifically whether you have a special educational needs status (a form of 'health data'). We collect this information for the purposes of monitoring equality considerations, for example, in ensuring that reasonable adjustments are being provided to students. This data is included within the data we are sharing for research purposes to allow, for example, further equalities analysis.

Why your data is being shared

We will only share your information in order to achieve the aims of this project and carry out research into relevant areas. At this link you can find the [list of research outputs that have been based on your data](#), including:

- the role of socio-demographic characteristics in grades achieved by students like you
- evaluation of centre assessment grades from summer 2020
- exploration of bias in teacher judgement

We believe that research based on your data has the potential to inform decisions that may affect students in England, improve fairness to students like you, and to promote confidence in our education, assessment and admissions system.

People who will be allowed to access your personal data

We will share your personal data between us (Ofqual, Department for Education and UCAS) and with the Office for National Statistics (ONS), who will be processing your data on our behalf and under our instructions.

Your data will not be shared with just anyone who asks for access. Accredited researchers will need to go through an approval process and their research project will need to be approved by us before we grant access to your data.

Accredited researchers will need to [access the research data securely](#) from the Office for National Statistics. The accredited researchers will also be responsible for complying with data protection law when they access your data.

Are we allowed to use your information?

We are legally allowed to use your information for the purposes explained above because the processing of your personal data, including special category personal data, is necessary for the performance of our public function and for research purposes which are in the public interest and legitimate interests.²

The processing of your personal data is not likely to cause you substantial damage or distress and it is not carried out to take any measures or make any decisions about you. Your data is being processed to understand more about the education and qualification system and to promote equality of opportunity and treatment of students.

We have carried out data protection impact assessments for this project. We have considered and applied appropriate safeguards for your rights and freedoms, including with regards to the data minimisation principle making sure we are only making relevant information available. This is the reason why we will, among other safeguards, pseudonymise and de-identify your data to the fullest extent possible.

How your information is kept safe

We have put measures in place so that people can only see the information that they really need, and they will not use the information to find out who you are. We have also taken steps to keep your information secure so it is protected from breaches and attacks from hackers, and other incidents.

We are taking measures to ensure your personal data is protected to the maximum extent, and have instructed the Office for National Statistics to do the same. Each organisation's data will be linked together and then pseudonymised by removing identifiable information before being converted to the data available to accredited researchers. Accredited researchers are trained and trusted to use data appropriately to carry out valuable, ethical research with a public benefit. Data will be accessed only using secure technology systems. Further security controls are also applied by the Office for National Statistics before the research output is disclosed to make sure that the identity of individuals and the identity of any organisations is kept secure. More details on these controls, also known as [the Five Safes](#), are available on the Office for National Statistics website.

² There are a number of legal provisions relevant to this work, but in terms of data protection law, the relevant provisions are: Article 6(1)(e) of the UK GDPR which allows DfE and Ofqual to process personal data for our public task; and Article 6(1)(f) of the UK GDPR which allows UCAS to process personal data for the purposes of legitimate interests; Article 9(2)(j) UK GDPR which allows us to process special category data where it is necessary for the purposes of research (such processing to be proportionate to the aims pursued and subject to safeguards); and schedule 1, paragraph 4 of the Data Protection Act 2018.

How long your data is kept

Data will be kept for a minimum of 18 months. Accredited researchers that start a project within the 18 months will be allowed to complete their research after this time. We will carry out periodic reviews to ensure the data is retained for no longer than is necessary for the research purposes for which the data was originally processed. Once we have concluded this project we will retain the data in line with Ofqual, Department for Education and UCAS privacy notices below.

Your rights

You have the right to:

- tell us you don't want us to use your information
- ask to see the information we hold about you
- ask us to change information you think is wrong
- ask us to remove information when it's not needed anymore
- be told how we use your information

Please note that some of these rights are qualified and may not apply. Ofqual, Department for Education and UCAS are not carrying out any automated decision making as part of this project. If you have questions about your rights, you can contact any of us using the details above. We will be able to help you and answer any questions that you have.

If you want to speak to, or make a complaint to, the authority who looks after information rights, you should contact:

[Information Commissioner's Office](#)

Telephone: 0303 123 1113

Privacy and data protection notices

Each organisation publishes a policy on how it processes and protects personal information:

- [Ofqual's personal data protection policy](#)
- [Department for Education's NPD privacy notice](#)
- [Department for Education's personal information charter](#)
- [UCAS privacy notice](#)