

PRIVACY NOTICE FOR PARTICIPANTS IN NEURODIVERSITY FROM THE LENS OF NEURODIVERSE UNIVERSITY STUDENTS STUDY

About this document

This Privacy Notice (**Notice**) explains how researchers of the study (the **researchers, we, our, us**) process the personal data of participants (**you, your**) and your rights in relation to the personal data we hold.

For the purposes of any applicable data protection laws in England and Wales, including the Data Protection Act 2018 (DPA) the UK General Data Protection Regulation (UK GDPR) and General Data Protection Regulation EU 2016/679 (EU GDPR), the researcher is the data controller of your personal data.

How your personal data is collected

The researchers will collect your personal data from the following sources:

- from you, typically when you:
 - complete surveys and feedback forms;
 - interact with us in focus groups, and/or interviews;
 - request information / assistance via an online form
- from third parties such as:
 - Affiliate partners that you have consented / requested to provide Imperial with your data. This could include student mailing lists.

What categories of personal data are collected?

We collect the following categories of personal data:

Identification and contact details

- biographical information such as your name, salutation, title, date of birth, age and gender;
- your contact details including email address and phone number;
- your nationality. We will also allocate you a unique student number;
- diversity and background information that you provide to us.

Student life and academic

- the courses you have completed, dates of study;
- information relating to your education and employment history, the school(s), colleges or universities you have attended and places where you have worked;
- information about your family or personal circumstances (including welfare information), and both academic and extracurricular interests;

Online and transactional

- information concerning your health and medical conditions (e.g. disability and dietary needs); and
- information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

The basis for processing your data, how we use that data and with whom we share it

We will process your personal data exclusively in ways you have consented to. We set these out as follows:

As part of the contractual relationship between you and the researchers

In this respect we use your personal data for developing resources. As part of this process, we will not share your personal data with third parties. The findings from the study will be shared with the wider community in the form of reports and publications as well as seminars.

Other legitimate interests

Your personal data will also be processed because it is necessary for the researchers' legitimate interests or the legitimate interests of a third party. This will always be weighed against your rights, interests, and expectations.

Examples of where we process data for purposes that fall under legitimate interests include:

- publishing your name for activities such as seminars
- sharing your information with Qualtrics (<https://www.qualtrics.com/uk/>) who issue surveys on our behalf so that we can evaluate our performance and obtain feedback. Responses will be anonymised (no IP address or location information will be gathered by Qualtrics survey) and only the information provided by answering the questions will be used for analysis.
- organising events and services (including where applicable after you leave the College), and the provision of products that you have requested or ordered from us.
- archiving and statistical analysis or research, which may include understanding more about our community to improve engagement, access and diversity (but we will not use your name except to the extent relevant and necessary for the purpose).
- the recording of audio/images for use in our official materials to promote the work. These materials may include the website, social media channels, in press releases and mailings, on event posters, on TV screens on campus or in magazines. We rely on our legitimate interests to do this where it would not be necessary, appropriate or practicable to obtain your specific consent. We will seek specific consent for prominent or impactful uses however;
- For the purposes of learning analytics we will analyse student personal data in order to improve the student experience for current and future cohorts, enhance the effectiveness of the College's learning, teaching and assessment activities, support the design and delivery of programmes and modules, and to further understand our community in order to improve engagement, access, and diversity and support students better. Where we use personal data for these purposes, we will ensure that any published information is pseudonymised. Results will be presented as aggregate data, even if the underlying calculations depend upon matching data at individual level.

Where you have consented

Your personal data will also be processed by the researchers where we have your consent.

Examples where consent would be sought or given may include where specific services have been requested or applied for from the researchers or where the law or some other protocol requires that the researcher obtains your consent (for certain marketing or fundraising communications, or participation in certain types of research projects).

Where applicable, consent will always be specific and informed on your part, and the consequences of consenting or not, or of withdrawing consent, will be made clear.

How is your personal information used after you graduate?

Research data will be stored securely in a password protected folder on OneDrive. Primary research data will be stored securely according to College's retention policy for up to 10 years after the project is completed. Analysis will be conducted using pseudonymised data and findings from research will be shared with participants.

Your rights under the Data Protection Legislation

Under data protection legislation you have the following rights:

- To obtain access to, and copies of, the personal data we hold about you. Further information of how to make such an application can be found at [Imperial College London - Subject Access](#).
- To require that we cease processing your personal data if the processing is causing you damage or distress;
- To require us not to send you marketing communications.

- To request that we erase your personal data;
- To request that we restrict our data processing activities in relation to your personal data;
- To receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

You have the right to object to the data processing activity at any time. You can do so by contacting the researcher with the contact details below, your request must provide specific reasons why you are objecting to the processing of your data and this should be based on your particular situation.

If you have any questions about these rights or how your personal data is used by us, you can contact the researcher using the details below:

- Post – Senior Teaching Fellow
- Address – ACEX 1M17A, Imperial College London, South Kensington, London, SW7 2AZ
- Email – v.bhute@imperial.ac.uk
- Telephone – 020 7594 5575

You can also contact the Data Protection Officer using the details below:

- Post – Data Protection Officer
- Address - Level 4 Faculty Building, Imperial College London, South Kensington, London, SW7 2AZ
- Email – dpo@imperial.ac.uk
- Telephone – 020 7594 3502

If you are not satisfied with how your personal data is used by the researcher you can make a complaint to the Information Commissioner (www.ico.org.uk).

How long is my personal information retained for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collect it for. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data (such as operational, contractual, legal, accounting or reporting requirements) and whether we can achieve those purposes through other means, and the applicable legal requirements.

Any resulting outcomes or findings that we publish will be statistical and pseudonymised and will not identify individuals. If you do object to our retaining your admissions information for these purposes, we will consider such objections alongside available ways to safeguard and minimise personal data that will not prejudice the College's core research functions. We will also retain applications to assist our ability to detect fraud.

If you have any further questions, please contact v.bhute@imperial.ac.uk.